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VAT REGISTRATION NO: 290 0603 30

For: Blueprint Architectural Ltd

Site: Moreton Inn, Ruabon Road, Ruabon, Wrexham LL14 6PU

National Grid Reference: SJ 3017 4548

Date of Issue: 11th August 2025

Re: Pond Creation and Management Plan

Document Context

As part of a granted planning application with Wrexham County Borough Council (App. Ref.: P/2023/0095[1]) involving the site of the former Moreton Inn in Ruabon, Wrexham (termed 'the site'), Tyrer Ecological Consultants Ltd (Tyrer Ecological) were commissioned to provide documentation to discharge planning conditions pertaining to ecological constraints at the site.

Consent was granted following a suite of prior surveys and documents produced during 2021 – 2024. The most relevant documents to date include:

Preliminary Ecological Appraisal **– Tyrer Ecological Consultants Ltd (March 2021)**

Dusk Survey Results **– Tyrer Ecological Consultants Ltd (June 2021)**

Further Information Report **– Tyrer Ecological Consultants Ltd (September 2021)**

Planning consent was granted in December 2024, with the following planning condition applied:

"*6. Within 12 months of the date of this decision, and prior to the commencement of construction works of any part of a dwelling hereby approved, the pond shown on plan ref: N035/015 'Pond Location' shall be implemented on site in strict accordance with a detailed construction scheme which shall have first been submitted to the Local Planning Authority for written approval. The pond shall thereafter be permanently retained, managed and maintained in accordance with a long terms ecological management plan, also to be submitted to the Local Planning Authority within 12 months of the date of this decision."*

The proposals for which the application has been granted involve demolition of the existing, disused public house and associated outbuilding to allow the erection of nine new detached and semi-detached dwellings with associated landscaping and access from Ruabon Road to the west.

This document therefore serves to provide supplementary information to the 2021 issued ecological reports. The aim of this document is to provide a detailed creation, management and monitoring plan for the proposed new pond, to ensure it provides habitat suitable for a variety of native flora and fauna over an extended time period (25 years).

[1] Available here: https://planning.wrexham.gov.uk/planning/search-applications?civica.query.FullTextSearch=P%2F2023%2F0095#VIEW?RefType=GFPlanning&KeyNo=73834&KeyText=Subject

Background

The original Preliminary Ecological Appraisal (PEA) was undertaken by Tyrer Ecological on 11th February 2021 and included habitat mapping of the full site as well as an assessment for the presence, evidence or suitability for any protected species which might reasonably be expected to be present in the area. The key findings of the PEA included the suitability of the buildings for roosting bats and nesting birds, and of the surrounding habitat for breeding birds, hedgehogs, and amphibians.

Notably, the site was host to very limited areas of suitability for great crested newts (*Triturus cristatus*) (GCN) but has poor connectivity to any pond network which could support a breeding population or metapopulation of GCN. However, the designated site Johnstown Newt Sites Special Area of Conservation (SAC) / Stryt Las a'r Hafod Site of Special Scientific Interest (SSSI) lies 78m to the west at its closest point; this site is designated primarily due to its internationally significant population of GCN. As such, precautionary measures in relation to GCN were recommended.

Two dusk emergence surveys were undertaken at the site in May 2021, in line with 2016 Bat Conservation Trust guidance and the findings of the PEA, covering both the former public house and outbuilding. No bats were recorded emerging from either building, and as a result no further surveys or mitigation measures were required, though general enhancement measures for bats were recommended.

Natural Resources Wales (NRW) issued a consultation response in relation to the development in July 2021, highlighting the need to implement more stringent safeguarding measures for GCN, including Reasonable Avoidance Measures (RAMs) during the construction phase, the creation of a Biosecurity Risk Assessment and Ecological Compliance Audit, the completion of a Habitats Regulations Assessment, and the implementation of on- and/or off-site mitigation for GCN. A Further Information Report was therefore created in September 2021 which aimed to address these recommendations, with on-site habitat creation and enhancement measures detailed to ensure continued provision for GCN on-site.

NRW provided additional comments in a consultation response in March 2023; these comments identified the need to secure long-lasting and high-quality habitat for GCN to satisfactorily mitigate the development and welcomed the suggestion of a commuted sum to be utilised for the continued management of the SAC. Following the provision of this response, it is understood that the applicant identified an area of land to the north-east of the site and within the SAC/SSSI which could be used for off-setting purposes (see **Figure 1** overleaf) and agreed to the creation of a new pond aimed at supporting native wildlife, including suitability for GCN.

The new pond is proposed to be located within the SSSI/SAC, specifically within Aberderfyn Nature Reserve, located approximately 0.8km to the north-east of the application site boundary and just 80m from the southernmost pond in an existing pond network.

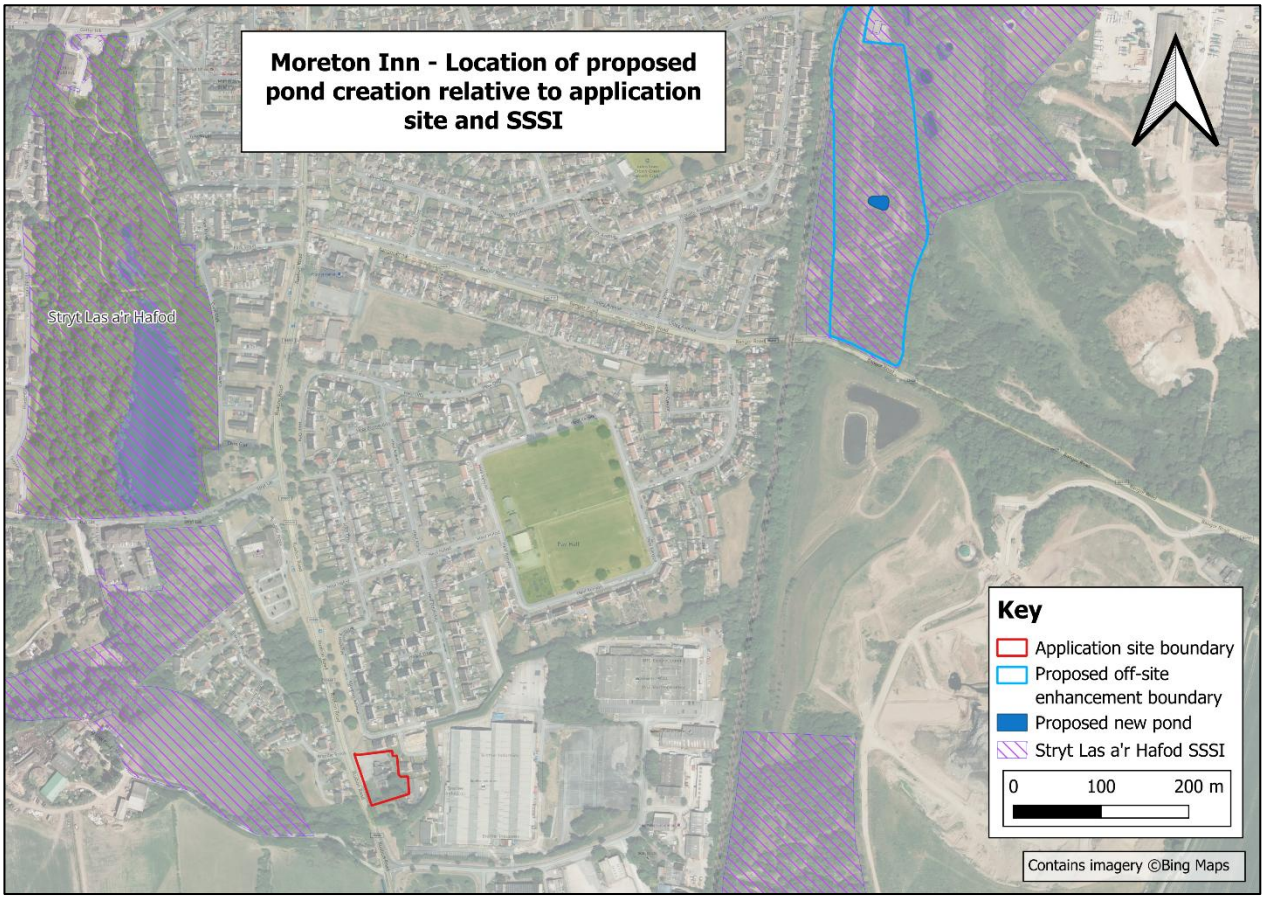


Figure 1: *Map of the Moreton Inn site and surrounding area showing nearby regions of the Johnstown Newt Sites SAC / Stryt Las a'r Hafod SSSI and location of the proposed new pond*

Pond Creation, Management & Maintenance

Possible Constraints

Any management that would result in offences under protective legislation pertaining to wildlife **cannot** be undertaken and additional measures may be required to ensure wildlife is protected. As such, creation and management provisions are devised to ensure conformity with all relevant legislation, which includes (but is not limited to); the Wildlife and Countryside Act (WCA) 1981 (as amended) and the Conservation of Habitats and Species Regulations 2019 (EU Exit) (as amended).

The key species groups which have the potential to be present on-site both during and at the post-development stage, therefore requiring careful consideration during any management and / or maintenance operations, are:

- **Amphibians:** Several amphibian species are protected under UK legislation. The great crested newt (Triturus cristatus) is fully protected in all life stages under Schedule 2 of The Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). It is also listed as a species of principal importance under Section 7 of the Environment (Wales) Act 2016. The common toad (*Bufo bufo*) and common frog (*Rana temporaria*) are widespread species, though the common toad is also a Section 7 species. Should a great crested newt be observed at any time during site works, all operations must cease, and a qualified and licensed ecologist should be contacted immediately for further advice.

- **Breeding birds:** All wild birds, their nests (while being built or in use), eggs and dependent young are protected under the Wildlife and Countryside Act 1981 (as amended). Species listed on Schedule 1 of the Act are afforded additional protection against disturbance while nesting. Habitats such as tall grassland, scrub and wetland areas may support nesting birds. Any vegetation clearance or site works with the potential to affect nesting birds should be preceded by appropriate checks, particularly during the nesting season (typically March to August inclusive). If active nests are found, affected areas must be left undisturbed until the young have fledged and the nest is no longer in use.

- **Invasive Species:** In Wales, legislation relevant to invasive species includes Schedule 9 (Part II) of the Wildlife and Countryside Act 1981 (as amended) and the Invasive Alien Species (Enforcement and Permitting) Order 2019 (IASO). Under Section 14(2)(a) of the WCA, it is an offence to plant or otherwise cause to grow in the wild any plant species listed in Part II of Schedule 9. These include species such as floating pennywort (*Hydrocotyle ranunculoides*). Under Schedule 2 of the IASO, it is an offence to import, keep, breed, transport, sell or release into the environment any of the species it lists. This includes species such as signal crayfish (*Pacifastacus leniusculus*) and Himalayan balsam (*Impatiens glandulifera*). Contractors and site operatives should implement robust biosecurity measures to prevent the spread of INNS between sites and waterbodies.

- **Invertebrates:** Many invertebrate species, especially freshwater species, play key roles in pond ecosystems. Of approximately 4,000 freshwater invertebrate species in the UK, around 200 are considered rare, vulnerable, or endangered. Several of these are listed under Section 7 of the Environment (Wales) Act 2016 as species of principal importance for biodiversity conservation. The presence and diversity of invertebrate assemblages are indicators of pond health and water quality. Ponds should therefore be managed sensitively, with invertebrates considered a material factor in ecological assessments and site management planning.

- **Fish:** Fish may be present in some pond habitats, particularly those on floodplains or connected to other waterbodies. However, in enclosed or ephemeral ponds, the presence of fish can reduce biodiversity, particularly through predation on amphibians and aquatic invertebrates. Some fish species, such as non-native carp hybrids, have been introduced through stocking or pet releases and are considered invasive. Where appropriate, certain ponds — especially those in upland or ephemeral systems — should be managed to remain fish-free to support their conservation value.

- **Mammals:** Many mammal species are protected under various legislation in Wales. The badger (*Meles meles*) is protected under the Protection of Badgers Act 1992 and the Wildlife and Countryside Act 1981 (as amended). The hedgehog (Erinaceus europaeus) is a species of principal importance under Section 7 of the Environment (Wales) Act 2016. These and other small terrestrial mammals may be present across a variety of habitats for foraging or commuting. If evidence of any protected mammal species is identified during site works, appropriate Reasonable Avoidance Measures (RAMs) may need to be implemented. The water vole (*Arvicola amphibius*) is also fully protected under the Wildlife and Countryside Act 1981 (as amended) and may utilise riparian grassland and watercourse margins. Pre-commencement checks should be undertaken where works are proposed near waterbodies, to ensure no disturbance to this species.

- **Reptiles:** All native reptile species in Wales — including common lizard, slow worm, grass snake and adder — are protected under the Wildlife and Countryside Act 1981 (as amended). This makes it an offence to intentionally kill or injure them. The Countryside and Rights of Way Act 2000 (CROW Act) strengthens this protection by making it an offence to intentionally or recklessly damage or destroy places used for shelter or protection. All widespread reptiles are also listed as species of principal importance under Section 7 of the Environment (Wales) Act 2016, making them a material consideration in land management and planning decisions.

Creation

The following creation scheme has been created using a combination of the GCN Conservation Handbook[2] (Langton *et al.*, 2001), the GCN Mitigation Guidelines[3] (English Nature, 2001), and the combined experience of Tyrer Ecological Consultants Ltd. Though the two referenced documents are now over 20 years old, no updated guidance has been published to date which is considered to be industry standard.

The proposed pond will have a surface area of approximately 300m^2. No topographical drawing of the proposed pond in cross-section has been created; the pond should have a maximum depth of 2.0m, with a gradually stepped profile from the deepest section to the edges so as to create varied depths suitable for a variety of floating, aquatic, semi-aquatic and marginal native plant species.

During pond creation, the following should be considered:

- When dry, start by digging a deep area centrally (dig to 2.0m) using a mini digger or other light digger with toothed bucket. Ideally, first strip the topsoil and remove it before commencing excavation. This will reduce the amount of nutrients entering the water. Excess nutrients can pollute the water and encourage the growth of algae.
- Ensure gradually shallower margins are created and / or manipulated into the design. The edges of ponds are usually the richest areas for wildlife. To increase this habitat, create long, irregular shaped edges and shallow, undulating banks. Some species prefer cold, deep water, while others need warmer, shallower water. Deeper ponds will also provide a greater buffer against rapid temperature changes or surface water freezing; ponds of 1.0m depth or greater are therefore more likely to be suitable for GCN for a higher proportion of the year.
- Create plenty of shallow areas (less than 0.1m deep) around the edges. Slopes should be no more than 12º and preferably less than 3º. Use the teeth of the excavator bucket to create mounds and hollows around the pond or lake edge. This will create niches for different species to colonise.
- Aim to vary the depth of the pond and use some subsoil to create different depths to the pond. At least part of the pond margin should be shallow to enable wildlife to enter and leave safely and create a boggy area suitable for moisture loving plants (prescribed species in **Table 1**). The more varied the pond shape, the greater value of mosaic of vegetation is possible.
- Allow the pond or lake to fill and dry naturally. Ponds that dry up occasionally are often more effective ponds for biodiversity due to absence of fish which can predate on amphibians and other species.
- Spread any remaining subsoil away from the site if possible. Do not spread any material, especially topsoil, uphill of the pond or lake because soil and nutrients will wash into the water. Spreading uphill will also block surface runoff and restrict the water supply.
- Spoil can be used to create south-facing banks as basking sites for reptiles or as beetle banks elsewhere on site. Any such soil should be left as uncompacted mounds or banks; it can be mixed with clean rubble to create refugia/hibernacula that can be utilised by GCN during their terrestrial phase.

[2] Langton, T., Beckett, C. and Foster, J. (2001). Great Crested Newt Conservation Handbook. Froglife, Suffolk. Available here: https://cieem.net/resource/great-crested-newt-conservation-handbook/
[3] English Nature (2001). Great Crested Newt Mitigation Guidelines. English Nature, Peterborough. Available here: https://cieem.net/resource/great-crested-newt-mitigation-guidelines/

Utilise native species when planting within new ponds at all locations, both within the margins as well as the emergent / floating aquatic vegetation within the water body. The area surrounding the pond should also be managed favourably as to not ecologically isolate the pond from other valuable habitats. See **Table 1** below for a list of suitable native species.

Table 1 – Suitable native species for planting within created / enhanced ponds

Planting Location	Common Name	Scientific Name
Pond Margins	Marsh marigold	*Caltha palustris*
	Yellow iris	*Iris pseudacorus*
	Ragged-robin	*Lychnis flos-cuculi*
	Water mint	*Mentha aquatica*
	Watercress	*Nasturtium aquaticum "Rorippa"*
Deep Marginal	Common spike-rush	*Eleocharis palustris*
	Water forget-me-not	*Myosotis scorpioides*
	Brooklime	*Veronica beccabunga*
Emergent Vegetation	Water violet	*Hottonia palustris*
	Amphibious bistort	*Polygonum amphibium*
	Water crowfoot	*Ranunculus aquatilis*
	Arrowhead	*Sagittaria sagittifolia*
	Upright branched bur-reed	*Sparganium erectum*
Aquatic / Floating Plants	Water-starwort	*Callitriche stagnalis*
	Hornwort	*Ceratophyllum demersum*
	Spiked milfoil	*Myriophyllum spicatum*
	Broad-leaved pond weed	*Potamogeton natans*

The topography of a wildlife pond and its surrounding area should be varied to provide sufficient niche variation which will in turn allow for a range of flora and fauna to establish within the pond. See **Figure 1** overleaf for an indicative example of pond depth variation and the planting regime within, as an addendum to the above information.

Management

During any future pond management / maintenance works, disturbance to the surrounding habitats will be minimised and the works should be undertaken by hand and light machine strimming wherever possible.

There is no ideal time of year to manage a pond, as different animals and plants have different cycles of breeding, growth and dispersal; however, it is generally considered that late autumn or winter is the most appropriate time for pond management. During this time period, GCN will typically be in their terrestrial phase and thus less likely to be impacted.

Ponds are a potential hazard to children and the wider general public, and if protection is required an appropriate barrier should be provided. Wooden palisade fencing is recommended with vertical slats with a maximum gap between each of 1.0m, with room at the bottom of the barrier for faunal species to commute. Fencing must be at least 1.1m high. All access gates must be lockable, and their padlocks or other locks kept in good working condition with access to be limited to authorised adults only.

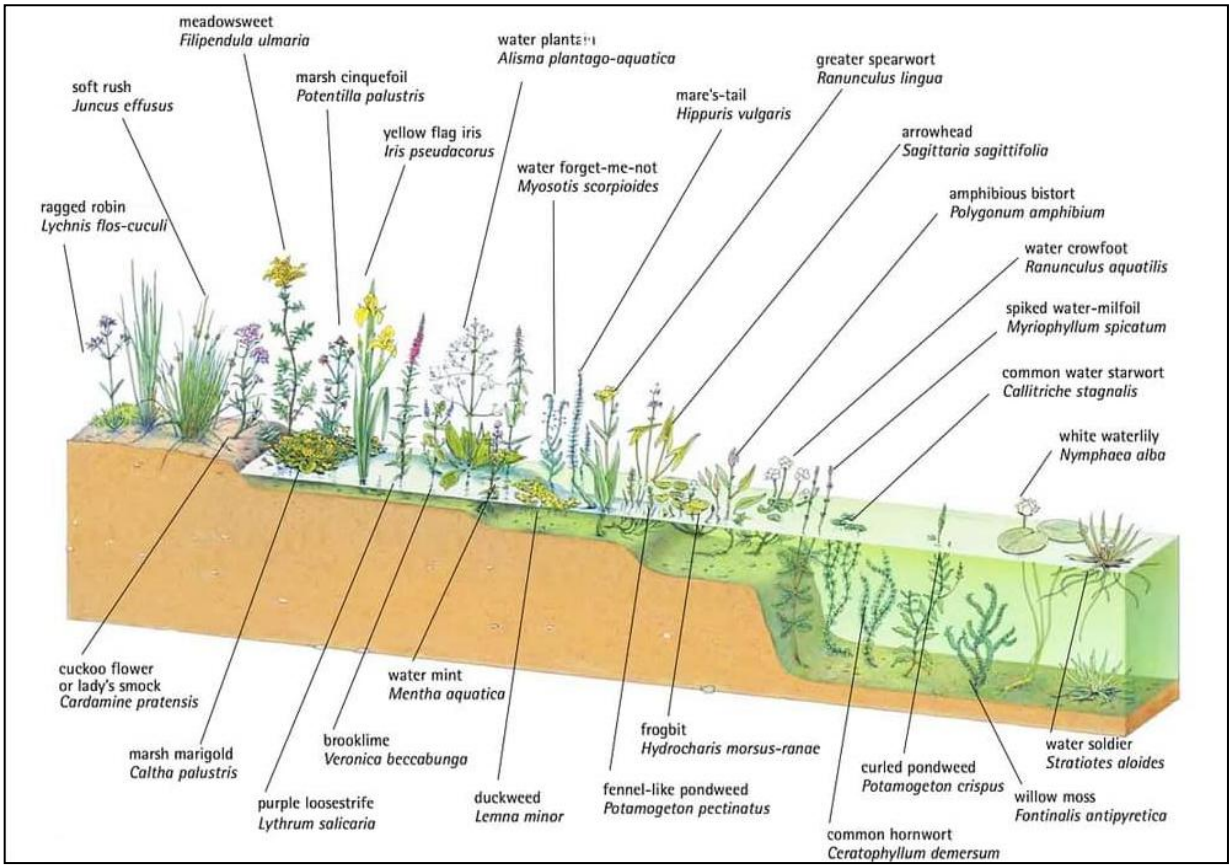


Figure 1 – *Typical wildlife favourable pond floral community (Great Crested Newt Conservation Handbook © Froglife 2001)*

Any planting scheme should consist of native species which are within their native range in the north of Wales; suitable species for planting in this habitat can be found in **Table 1** previous. Frequently the best approach to pond vegetation colonisation is a hands-off approach in which the pond is allowed to be colonised naturally from the seed bank and natural dispersal. Ponds are generally very rapidly colonised by native flora and fauna as freshwater species are well adapted to dispersal, with waterfowl acting as a dispersal mechanism for some such species which can cross great distances in a very short time. However, given the intended purpose of this pond as a GCN breeding pond, supplementary planting of suitable native species may help provide shelter from predation and suitable egg-laying opportunities in the first years.

Inspections:

- Inspect on an annual basis when vegetation is beginning to flower (typically July – August) to ensure that all species are competing, and that the water quality looks to be good.

- It is advised that the ponds be re-assessed on the second and fifth year to determine potential for periodic management such as dredging or removal of dominant species, which might include invasives such as floating pennywort and parrot's-feather (*Myriophyllum aquaticum*) or bulrush (*Typha latifolia*) which can rapidly cover the entirety of a ponds surface.

A full list of management prescriptions, including a timetable of when to carry out these actions, is provided in **Table 2**, with a timetable of measures provided in **Tables 4 – 5**.

Table 2 – Long-term management targets and prescriptions for the newly created pond

Target	Management Prescriptions	Indicators
Good water quality	• Assess for and report and signs of visible pollution or eutrophication immediately on inspection • Remove any litter, and excess debris such as branches and leaf litter using a hand net • Net out significant algal blooms or over-dominant duckweed, in the short term • Identify sources of pollution and remove (e.g. redirect runoff or prevent livestock access, establish buffer zones)	Low turbidity, no obvious pollution, no algal blooms, surface free of oil. Presence of a diverse aquatic invertebrate assemblage.
Semi-natural habitat buffer	• Maintain a semi-natural buffer of appropriate, native grassland/wetland within 5m of the water's edge • Regularly assess the surrounding habitat for the presence of invasive non-native species (INNS), and significant scrub encroachment • Undertake annual, autumnal cut and collection of the buffer area to reduce enrichment in the soils surrounding the pond, avoiding key refugia and leaving a varied sward • Eradicate any legally designated INNS[4] such as Himalayan balsam (*Impatiens glandulifera*) entirely using a suitably licensed INNS contractor	Native, diverse sward in 5m buffer surrounding the pond, absence of any botanical INNS, legally designated or otherwise (see **Table 3** overleaf for a list of species identified under the Water Framework Directive by UK Technical Advisory Group).
Native, low-density fauna stock	• Monitor for presence of non-native fish or other species which have been artificially introduced, such as goldfish (*Carassius auratus*) or red-eared slider (*Trachemys scripta elegans*) for example • Capture and remove any such non-native species	Absence of any non-native faunal species observed during monitoring/inspections.
Limited shoreline shade	• Cut back encroaching scrub or trees growing in proximity to the water's edge	Less than 60% pond perimeter shade to water surface within 1m of the shore.
Macrophytic plant cover	• Remove excessive plant cover (over 80%) using a hand net and/or grapnel • Where plant cover is low following the first 5 years, restock through translocation of natives from nearby ponds and/or restocking with appropriately sourced native plugs	50-80% pond surface occupied by macrophyte cover (excluding duckweed).

[4] Species listed under either Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) or Schedule 2 of the Invasive Alien Species (Enforcement and Permitting) Order 2019

Table 3 – Relevant Water Framework Directive[5] UK Technical Advisory Group GB INNS

Plants		**Invertebrates**		**Fishes**	
Common Name	**Scientific Name**	**Common Name**	**Common Name**	**Common Name**	**Scientific Name**
American Skunk-cabbage	*Lysichiton americanus*	Asian Clam	*Corbicula fluminea*	Common Carp	*Cyprinus carpio*
Bohemian Knotweed	*Reynoutria × bohemica*	Bloody-red Mysid	*Hemimysis anomala*	Goldfish	*Carassius auratus*
Brazilian Giant-rhubarb	*Gunnera manicata*	Chinese Mitten Crab	*Eriocheir sinensis*	Topmouth Gudgeon	*Pseudorasbora parva*
Curly Waterweed	*Lagarosiphon major*	Demon Shrimp	*Dikerogammarus haemobaphes*		
Floating Pennywort	*Hydrocotyle ranunculoides*	Gulf Wedge Clam	*Rangia cuneata*		
Floating primrose willow	*Ludwigia peploides*	Killer Shrimp	*Dikerogammarus villosus*		
Giant Hogweed	*Heracleum mantegazzianum*	Quagga Mussel	*Dreissena rostriformis bugensis*		
Giant Knotweed	*Reynoutria sachalinensis*	Red Swamp Crayfish	*Procambarus clarkii*		
Giant-rhubarb	*Gunnera tinctoria*	Signal Crayfish	*Pacifastacus leniusculus*		
Himalayan Balsam	*Impatiens glandulifera*	Virile Crayfish	*Orconectes virilis*		
Himalayan Knotweed	*Koenigia polystachya*	Zebra Mussel	*Dreissena polymorpha*		
Japanese Knotweed	*Reynoutria japonica*				
New Zealand Pigmyweed	*Crassula helmsii*				
Nuttall's Waterweed	*Elodea nuttallii*				
Parrot's-feather	*Myriophyllum aquaticum*				
Rhododendron	*Rhododendron ponticum*				
Various-leaved Water-milfoil	*Myriophyllum heterophyllum*				
Water Fern	*Azolla caroliniana*				
Water Fern	*Azolla filiculoides*				
Water-primrose	*Ludwigia grandiflora*				

[5] WFD UKTAG (2021). *Classification of aquatic alien species according to their level of impact*. Available from: https://www.wfduk.org/sites/default/files/UKTAG%20classification%20of%20alien%20species%20working%20paper%20v8.pdf

Table 4 – Maintenance operations schedule for pond (Annual)

Operation	Months												Notes
	J	F	M	A	M	J	J	A	S	O	N	D	
Visual inspection of pond								✓					Annual check to inform further potential management
Pollution management	a/r												Report any signs of pollution and enact remedial works immediately
Remove rubbish / litter / debris	a/r												Use netting and limit disturbance to flora / fauna
Remove twigs, branches and excess leaf litter	a/r												Using hand net to maintain water quality and minimise turbidity
Manage surrounding land	a/r												Ensure semi-natural habitat buffer present to 5m from water's edge
Remove algae / duckweed	a/r												To prevent algal bloom / duckweed dominance and using a hand net
INNS removal	a/r												Report suspicious plants, animals and fish, remove by hand
Plant alternative species			✓										Where chosen plants have not established or macrophyte cover is low
Limit scrub encroachment	✓	✓								✓	✓	✓	Annually, through hand pulling, where appropriate
Shade management										✓			Leave 60% pond unshaded, never more than 25% change over 5 year period

Table Key
One operation per specified month – ✓
As required = a/r

Table 5 – Maintenance operations schedule for pond (25 years)

Operation	Years									Notes
	0-3	4-6	7-9	10-12	13-15	16-18	19-21	22-24	25	
Re-assess pond to determine potential for periodic management	2	5		10	15		20		25	Management could include dredging, dominant species removal
Dominant species removal	a/r									As required, following re-assessment
INNS monitoring		5		10	15		20		25	Continued long-term monitoring of INNS to inform further measures
Review management plan to identify key areas to target management	2	4	9		14		19	24		Recognise key parts of the plan which are proving effective / ineffective
Alter management plan	a/r									As required, following review
Final review of management plan										To identify efficacy of plan
Table Key Operation within specified year – 1, 2, 3 etc. As required = a/r										

Monitoring Scheme

Habitat

Through the 25-year duration for which this management plan covers, records should be kept of all operations carried out in relation to any part of the management plan. The actual management operations carried out can then be compared to the theoretical plan and any areas where there are discrepancies can be investigated further and changes can be made, either to the operation schedule or to the plan itself, to better reflect the nature of the habitat in question and to improve the efficacy of the scheme. Reviews should be undertaken annually for the first 5 years followed by once every 5 years for the next 25 years, in order to better develop the scheme and to adjust any parts of the plan which may not be achieving their objectives.

These reviews should ideally be undertaken in the presence of both a suitably qualified ecologist with knowledge of the specific target habitat conditions as well as botanical competency (ideally a FISC Level 4 or greater), as well as the contract team who are undertaking any management procedures at the site.

In the final year of the plan, the actual progress should be reviewed against the predicted status of the habitat, in order to evaluate the effectiveness of the operations carried out up to that point. This information can then be used to inform a subsequent long-term management plan if it is deemed necessary by the local authority.

All of the species suggested within this plan have been carefully selected in accordance with local suitability for the north-west, and any plant material which is unsuitable or defective in any other way should not be considered.

GCN

In addition to monitoring the success of habitat establishment at the pond, the applicant will be responsible for providing for annual GCN surveys at the pond, to assess for the establishment of a population.

The survey should be undertaken in the peak period of mid-April to mid-May and should only be undertaken by a suitably licensed ecologist or their accredited agent(s). The survey should follow the approved and industry-wide methodology detailed in the Great crested newt mitigation guidelines and Great Crested Newt Conservation Handbook.

The results of each annual survey will be incorporated into a report, which will be supplied to the applicant, to Wrexham County Borough Council, or Natural Resources Wales upon request in the form of an interim report.

Relative to the above, the recommendations have been determined using the collective and long-standing experience of Tyrer Ecological Consultants Ltd and the specific nature of the site. Tyrer Ecological Consultants Ltd can confirm that the contents of this document have been reviewed and approved by Mrs. K. Wilding, Director of the company and experienced Ecologist of 16 years, and her assessment is consistent with that of Mr. Pescod.

The contents of this document can be relied upon and have been presented in accordance with best practice guidance, and all available survey data at the site to date.

Kind regards,

J. Pescod

Mr. J. Pescod (Principal Ecologist)
(11/08/2025)