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Dwellings at 38/40 Westminster Road. Ecological Appraisal

Dwellings at 38/40 Westminster Road
Moss
Wrexham
LL11 6DG

Produced by P J Ecological Solutions
on behalf of Retrospect Limited

August 2025

Version 1

Report by Matthew Whitehead
Reviewed by Paul Roberts

Executive Summary

Instruction
P J Ecological Solutions were commissioned by Retrospect Limited to undertake an ecological appraisal of an area of land belonging to 38/40 Westminster Road, Moss, Wrexham. The survey was commissioned to inform a planning application for the demolition of two former dwellings and the construction of three replacement dwellings with associated parking and gardens at the site.

Habitats
The proposed development will require the demolition of the existing buildings and the clearing of the vegetation and soil to the rear thereof. It will also result in the loss of the disturbed land. Aside from when used by roosting bats or nesting birds (see Section 4.3), buildings are generally considered habitats of low ecological value, as is disturbed land. As such, subject to the adoption of suitable reasonable avoidance measures (bats and nesting birds) and the delivery of suitable compensatory roosting and nesting opportunities on-site, the loss of these extant habitats is likely to have an adverse ecological impact of only low local significance.

However, it is noted that the disturbed land to be cleared was created within the last two years, when seven mature trees planted within the area were felled. In the absence of any mitigating factors, the loss of these trees is expected to have had an adverse ecological impact of moderate local significance.

Per Planning Policy Wales XII, any trees felled to facilitate such a development must be replaced with at least 3 trees of a similar type and size. Therefore, at least 21 trees – native provenance ash, hazel, birch, oak, or similar; conforming to heavy standard nursery spec. – will be planted on-site (or off-site, as may be necessary).

It is understood that the development is to incorporate a sensitive landscaping scheme, designed to ensure that the development results in a clear net benefit to biodiversity. It is understood that a suitably qualified ecologist will be instructed to develop this scheme, which will include the planting of suitable replacement trees, as well as the creation of other habitats on-site to provide compensation for any others to be lost and to ensure that the total provision post-development is greater than at present/prior to the felling of the trees.

Wild Birds
To avoid disturbing or causing harm to the birds nesting within the buildings to be demolished, the demolition works will be undertaken outside of the peak nesting season for the species involved (March to August, inclusive). Further, compensatory nesting opportunities for the nesting sites to be destroyed will be provided via the erection of 1 No. Vivara Pro Jackdaw WoodStone Nest Box and 2 No. Woodstone Seville 28mm Nest Box upon suitable trees on site.

Subject to the delivery of the above, and subject to the implementation of a suitable sensitive landscaping scheme (see above), the nesting opportunities available on-site post-development are likely to be greater than are available at present. As further biodiversity enhancement provisions, it has been agreed that a 1 No. Vivara Pro Seville Nest Box, 1 No. Vivara Pro House Sparrow WoodStone Nest Box (Double Chamber), 1 No. Vivara Pro Build-In Swift Nest Box will be installed on the new dwellings.

In addition, to avoid disturbing or causing harm to nesting birds or their nests during the other site clearance (vegetation clearance) works, all such works will be undertaken in accordance with pre-defined reasonable avoidance measures. The reasonable avoidance measures detailed within Appendix 2 is considered suitable for the project.

Bats
The survey results indicate that the dwellings to be demolished support current day roosts for at least one common pipistrelle bat, at least one soprano pipistrelle bat, and at least five lesser horseshoe bats, and as a night roost by lesser horseshoe bats.

The proposed works will result in the destruction of the identified roosts and, in the absence of mitigation, have the potential to disturb or cause harm to any bats which are present at the time. A European Protected Species Mitigation License (EPSML) from Natural Resources Wales will therefore be required before site works can commence.

As a requirement of the license, the works will need to be undertaken in accordance with pre-defined reasonable avoidance measures and suitable compensatory roosting opportunities will need to be provided for those to be lost. The reasonable avoidance measures and mitigation and compensation scheme detailed within the associated document *Dwellings at 38/40 Westminster Road, Moss.; Protected Species Survey Report (Bats)* is considered suitable for the project.

In addition, to ensure that the compensatory bat roosts to be provided and the flightlines thereto/therefrom will not be affected by any post-development interference, both a sensitive landscaping scheme and sensitive lighting scheme will be submitted to the County Ecologist for approval prior to the commencement of works. The proposed development will then proceed in strict accordance with the approved plans.

Badgers, Common Herpetofauna, and Other Priority Wildlife
Whilst no evidence of badgers, common herpetofauna or other protected species or species of principal importance (e.g., hedgehog) was found within the site area or its surrounds, in the absence of further survey work, their absence from the surrounding area should not be assumed. Therefore, to avoid disturbing or causing harm to any badgers, hedgehogs, or reptiles which may be present or nearby during the other site clearance (vegetation clearance) works, all such works will be undertaken in accordance with pre-defined reasonable avoidance measures. The reasonable avoidance measures detailed within Appendix 2 is considered suitable for the project.

The site is considered wholly unsuited to the needs of any riparian or arboreal mammals.

Invasive Non-Native Species
Japanese knotweed has been identified within the garden area of the neighbouring property and extends to the site boundary. It is therefore very likely that the soil which is adjacent to the boundary and within the site is contaminated with seeds from the plant. Further, Montbretia has been identified within 50m of the site boundary. Both these species are listed within of Schedule 9 of the *Wildlife and Countryside Act 1981* (as amended). Therefore, to prevent the accidental spread of these species into the wild, especially during the site works, it is recommended that a Management Plan is prepared for treatment or removal.

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1. Introduction

P J Ecological Solutions were commissioned by Retrospect Limited to undertake an ecological appraisal of 38/40 Westminster Road, Moss, Wrexham (Grid Reference: SJ30855296; hereafter referred to as 'the site'). The survey was commissioned to inform a planning application for the demolition of two former dwellings and the construction of three replacement dwellings with associated parking and gardens at the site.

The site is set within a semi-rural position, close to the village of Brynteg to the west and Moss Valley Country Park to the east. Good quality native-species hedgerows and some trees provide connectivity between the site and nearby broadleaved woodlands and watercourses in the area, which will provide good foraging and commuting opportunities for bats and birds in the area.

A detailed desk study of the surrounding area has been undertaken, in addition to an extended Phase 1 survey of the site. The aim of these efforts/this appraisal is to:

- Detail the habitat types within and immediately adjacent to the application area.
- Identify both habitat and species constraints pertinent to the development proposals.
- Detail EPS licensing requirements, reasonable avoidance measures, mitigation, and compensation measures where necessary.
- Identify opportunities for the proposed development to provide enhancements and add to the biodiversity resource within the site.

This is in accordance with TAN 5 (Technical Advice Note 5), Nature Conservation and Planning, to enable an assessment of impacts and mitigation to negate impact as a consideration, material to the determination of planning requirements.

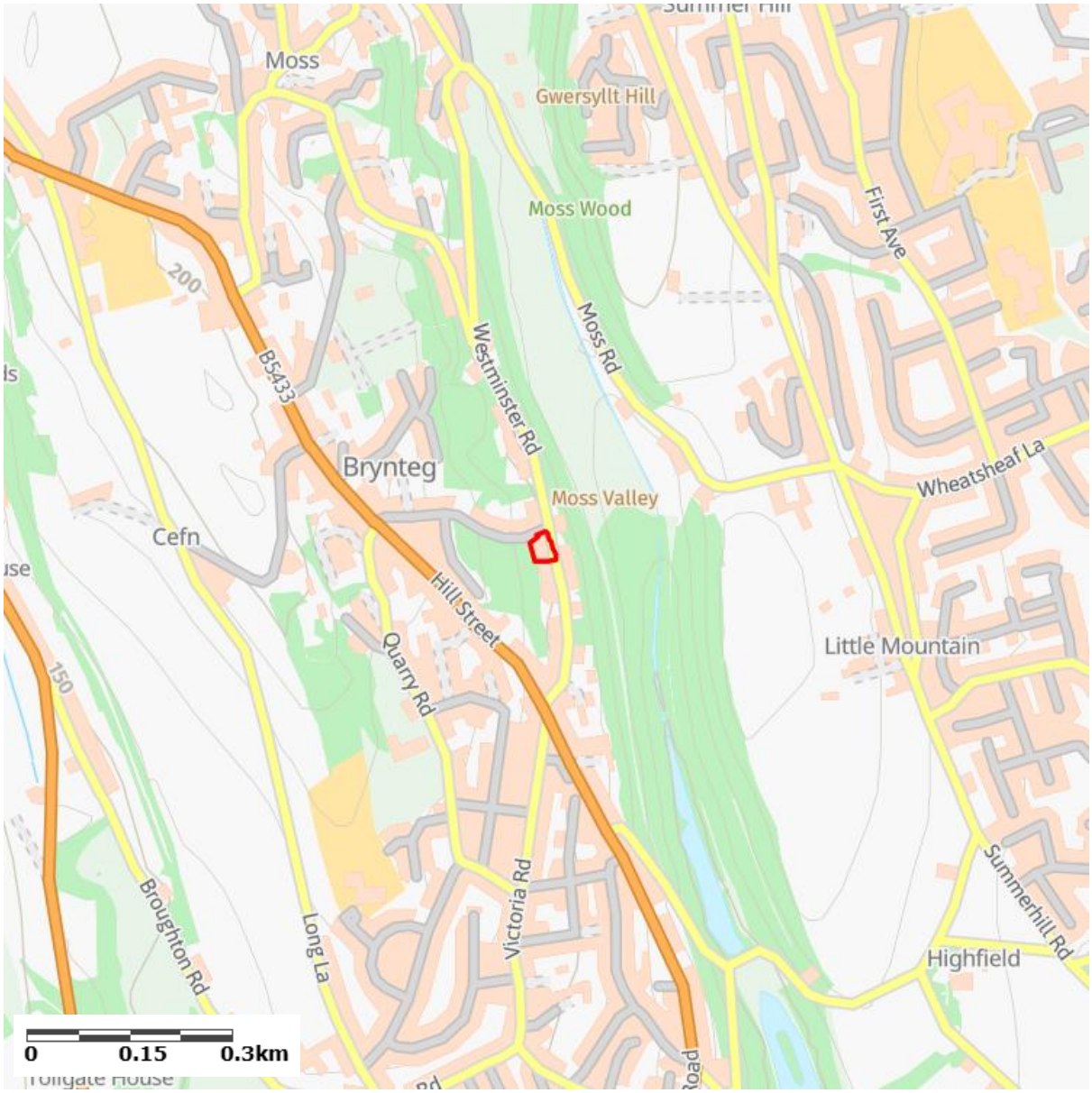


Figure 1.1: A 1:10,000 map view showing the site location and the surrounding habitats.

2. Method

2.1. Desk Study

2.1.1. Statutory and Non-Statutory Designated Sites

A desk-based study was undertaken to identify nearby habitats of importance and features providing local habitat connectivity, and to identify the presence of statutory and non-statutory designated sites within the vicinity of the site. These include:

- ***International recognised statutory designations:*** Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites.

- ***National recognised statutory designations:*** Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs)

- ***Local level non-statutory designations:*** County Wildlife Sites (CWSs), Local Nature Reserves (LNRs), Sites of Importance for Nature Conservation (SINCs), North Wales Wildlife Trust Reserves (NWWT reserves), and Royal Society for the Protection of Birds Reserves (RSPB reserves)

A 1km-radius search for statutory sites was undertaken using the Multi-Agency Geographic Information for the Countryside (MAGIC) and Natural Resources Wales (NRW) websites' interactive mapping applications, and a note was made of all such sites identified within the search area. A search for non-statutory sites was undertaken via informal means.

2.1.2. Species Records Pertinent to the Assessment

The desk-based study was extended to identify nearby records of protected species or species of principal importance, or of invasive non-native species. These include:

- ***European Protected Species:*** Species listed under Schedule II and V of the *Conservation of Habitats and Species Regulations 2017*.

- ***Specially Protected Bird, Animal and Plant Species:*** Species listed under Schedules I, V and VII of the *Wildlife and Countryside Act 1981 (as amended).*

- ***Species of Principal Importance:*** Species listed under Section VII of the *Environment (Wales) Act 2016*.

- ***Badgers:*** Badgers are protected under the *Protection of Badgers Act 1992*

- ***Invasive Non-Native Species:*** Species listed within the *Invasive Alien Species (Enforcement and Permitting) Order 2019* or within Schedule IX of the *Wildlife and Countryside Act 1981* (as amended).

A full records search from the local environmental records centre has not been undertaken at this stage of the project; however, a 1km-radius search for species records was undertaken using the interactive mapping applications available on the MAGIC, DataMapWales and National Biodiversity Network (NBN) websites, and a note was made of all protected species, species of principal importance, and invasive non-native species records retrieved.

2.2. Extended Phase 1 Survey

2.2.1. Phase 1 Survey

The initial extended Phase 1 survey of the site was undertaken on the 27th of January 2025 by Paul Roberts UCert who is an experienced ecological consultant who is familiar with the local area. Habitats were assessed by using Phase 1 habitat survey techniques, according to the methodology outlined in the *'Handbook for Phase 1 habitat survey'* (JNCC, 2010), which is a system for environmental audit widely used within the environmental consultancy field.

Whilst the initial survey was undertaken at a time of year when some wildlife will be hibernating or otherwise less active and when most annual plants will not be apparent, a further walkover survey of the site was undertaken prior to the initial bat activity surveys undertaken during the summer of 2025, during which the only change on site was growth of ruderal vegetation. Both the initial survey and further walkovers were undertaken in clear and dry conditions.

2.2.2. Species Surveys

A methodical search was undertaken for the following species, or field signs or other evidence thereof. In addition, the site and its immediate surrounds were assessed for their potential to support the following species, or to provide other ecological services to the following species:

- ***Wild Birds***: The site and its surrounds were searched for active or historical wild bird nests or evidence thereof. The site and its surrounds were also assessed for their potential to provide nesting opportunities for wild birds, or to provide foraging utility or habitat connectivity for wild birds. The survey was undertaken in accordance with the methods described within *'Common Standards Monitoring Guidance for Birds'* (Baker and Douse, 2004).

- ***Bats*:** The site and its surrounds were searched for structures or trees which could provide roosting opportunities for bats, and the habitats upon and surrounding the site were also assessed for their capacity to provide foraging opportunities for local bat species, and to provide habitat connectivity between nearby roosts and known foraging grounds. The survey was undertaken in accordance with the methodology prescribed within '*Bat Surveys for Professional Ecologists'* (BCT, 2023).

- ***Badgers*:** The site and its surrounds were searched for field signs indicative of badger (*Meles meles*) activity, such as setts, bedding material, latrines, guard hairs, scrapings produced during foraging behaviour, paths and paw prints. The site and its surround were also assessed for their potential to support badgers, or to provide foraging utility or habitat connectivity for badgers. The survey was undertaken in accordance with the methods described within *'Surveying Badgers'* (Harris, Cresswell and Jefferies, 1989).

- ***Arboreal Mammals (Hazel Dormouse, Red Squirrel and Pine Marten):*** The site and its surrounds were searched for field signs indicative of dormouse (*Muscardinus avellanarius*), red squirrel (*Sciurus vulgaris*) or pine marten (*Martes martes*), such as refuges or feeding remains (dormouse) or scat (pine marten), and for habitats suitable for the species, such as woodland/suitable hedges with a good under-storey/shrub layer and a range of food plant species, such as oak, hazel, bramble, honeysuckle, bilberry and rowan. The survey was undertaken in accordance with the methods described within '*The Dormouse Conservation Handbook, [2nd edn.]'* (Bright, Morris and Mitchell-Jones, 2006) and considering the habitat requirements outlined in *'Red Squirrel Conservation'* (Pepper and Patterson, 1998) and *'Conserving the Red Squirrel*' (Gurnell and Pepper, 1991).

- ***Riparian Mammals (Otter and Water Vole):*** The site and its surrounds were searched for field signs or habitats characteristic of otter (*Lutra lutra*) or water vole (*Arvicola amphibius*). The survey was based on the methods described within *'The Water Vole Conservation Handbook*' (Strachen, Moorhouse and Gelling, 2011) and *Essex Otter Survey, 2009-2010* (Darren Tansley, 2011).

- ***Common Herpetofauna (Reptiles and Amphibians):*** The site and its surround were assessed for their potential to support reptiles or amphibians. Key aspects considered included the habitats present upon/surrounding the site, the extent of the site, site aspect, connectivity and historic content. The survey was based on the methods described within *'The Herpetofauna Workers' Manual'* (Gent and Gibson, 2003).

- **Other Priority Wildlife:** A search for other species of principal importance (species listed under Section 7 of the *Environment [Wales] Act 2016*) suited to the habitats within or surrounding the site, was undertaken based on the methods described in *UK BAP Mammals: Interim Guidance for Survey Methodologies, Impact Assessment and Mitigation* (Birks *et al*, 2012).

- ***Invasive Non-native Species (INNS):*** A careful search was undertaken for floral species listed within the *Invasive Alien Species (Enforcement and Permitting) Order 2019* or within Schedule 9 of the *Wildlife and Countryside Act 1981* (as amended).

3. Results

3.1. Desk Study

3.1.1. Statutory and Non-Statutory Designated Sites

A review of the information retrieved during the desk study identified no such sites within 1km of the site (see Figure 3.1). As such and given the siting and relatively modest size of the project, no adverse impacts on any such sites are expected because of the proposed development.

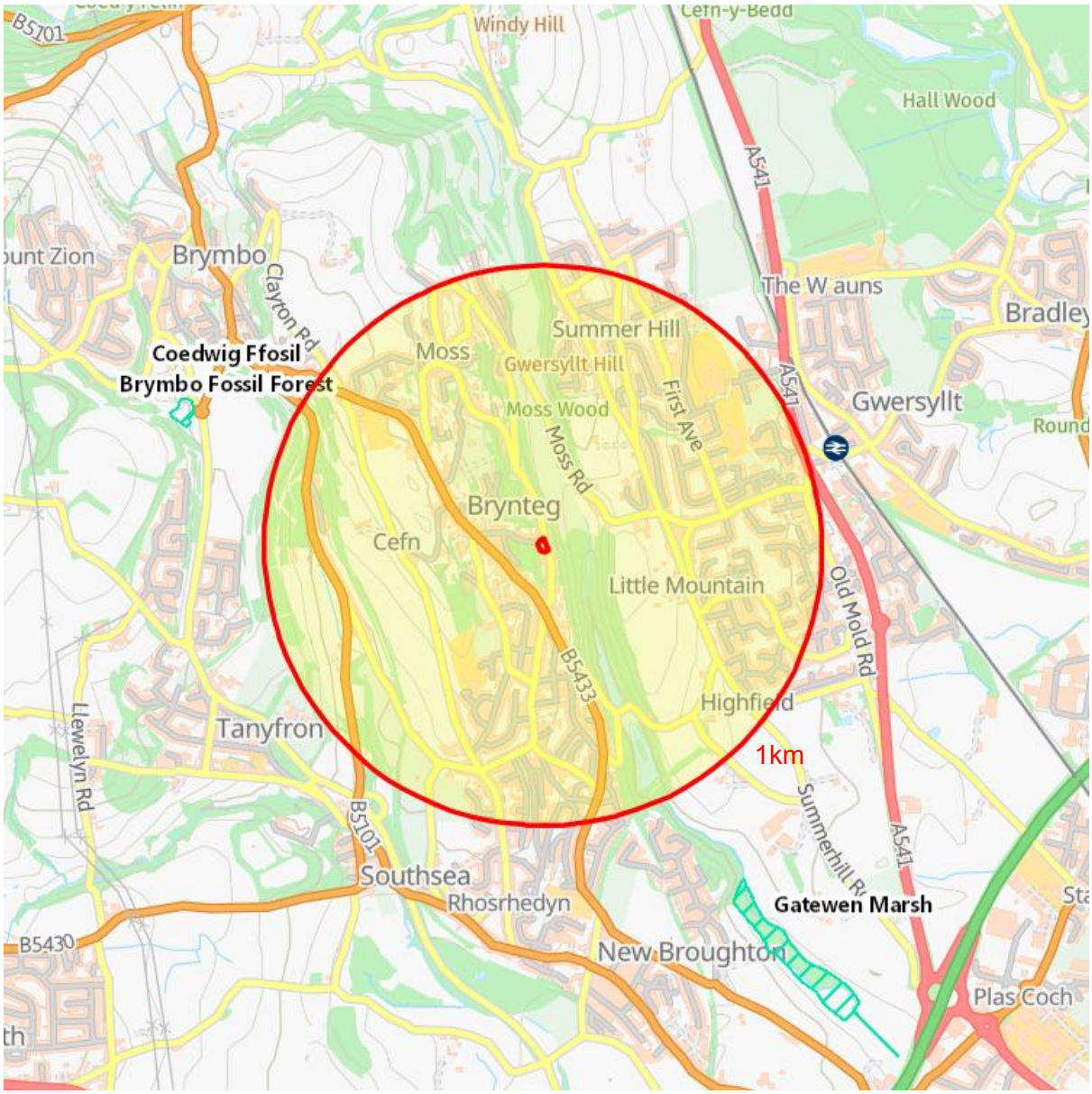


Figure 3.1: A 1:25,000 map view of the site relative to local designated sites.

3.1.2. Species Records and Habitats Pertinent to the Assessment

A review of the information retrieved during the desk study identified 175 species records, including records of common pipistrelle bat (*Pipistrellus pipistrellus*), great crested newt (*Triturus cristatus*)*, dunnock (*Prunella modularis*), herring gull (*Larus argentatus*), house

sparrow (*Passer domesticus*), kingfisher (*Alcedo atthis*), starling (*Sturnus vulgaris*), Canada goose (*Branta canadensis*), ring-necked parakeet (*Psittacula krameria*), harlequin ladybird (*Harmonia axyridis*), Himalayan balsam (*Impatiens glandulifera*), Japanese knotweed (*Fallopia japonica*), and wall cotoneaster (*Cotoneaster horizontalis*).

P J Ecological Solutions is also aware of a lesser horseshoe bat (*Rhinolophus hipposideros*) within the neighbouring chapel building.

**The great crested newt records retrieved were approx. 800m from the site, beyond Moss Valley.*

3.2. Extended Phase 1 Survey

3.2.1. Phase 1 Survey

The site comprises of two former dwellings (J.3.6), surrounded by hardstanding pathways (J.4). To the rear and the side of the dwellings is an area of bare ground which is the result of tree removal, which is becoming colonised by tall ruderal vegetation (C.3.1).

The boundary to the north and alongside the roadway is demarcated by a stonewall (J.2.5) and a defunct species poor hedgerow (J.2.2.2), with the wall extending to the east.

The boundary to the south is a stone wall (J.2.5) and extends from the roadway to the treeline.

The habitats and features recorded on site are mapped in Figure 3.2 and summarised in Table 3.1, below. Photographs of the above habitats and features are provided in Appendix 1.

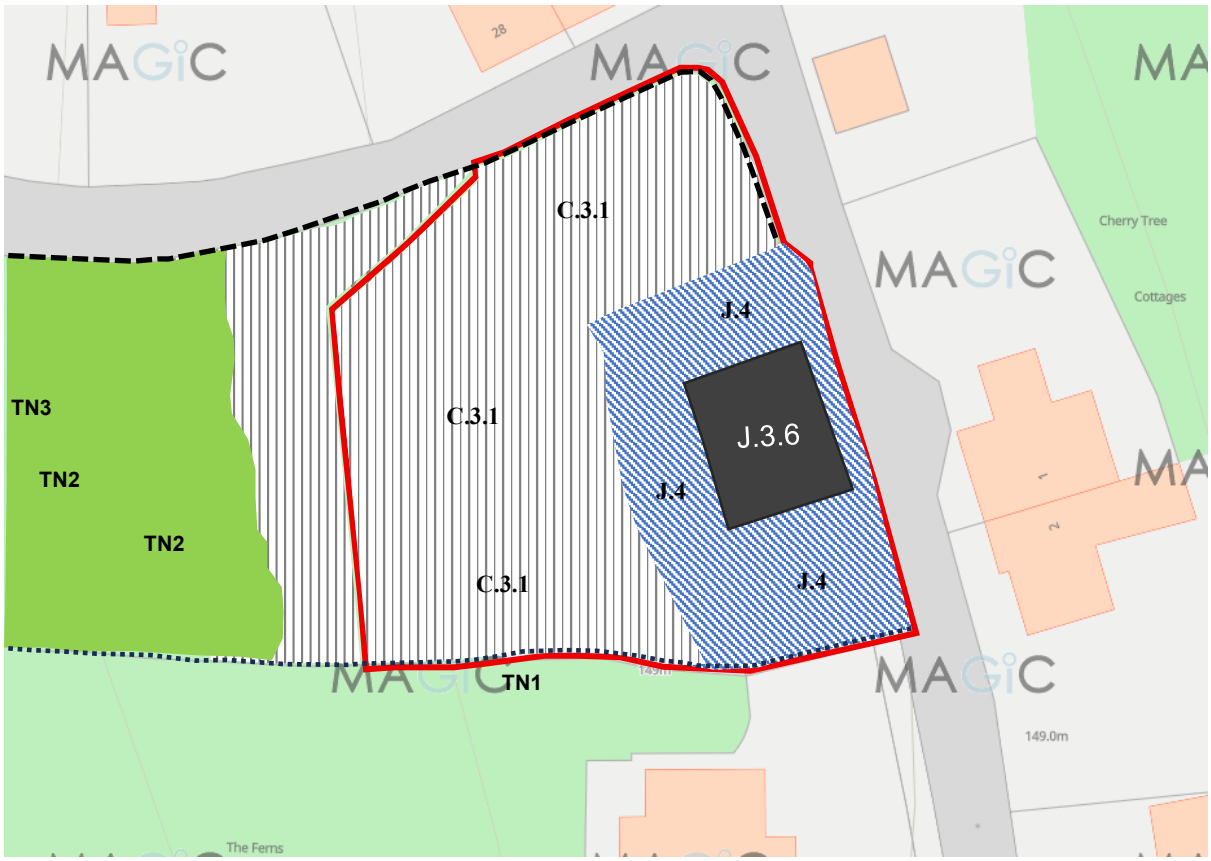


Figure 3.2: A 1:2,500 Phase 1 map of the site. The habitats within or which extend to within the site have been illustrated according to the key in Table 3.2. The approximate site boundary is shown in red.

Table 3.1: Summary of the habitats present within or immediate to the site.

Key	Habitat description and extent
C.3.1	**Disturbed land (C.3.1):** Disturbed land – the result of tree removal – which is being colonised by tall ruderal vegetation. It is set upon a moderate gradient descending to the east. Herbaceous species present include bramble (*Rubus fruticosus*), rosebay willowherb (*Chamerion angustifolium*), oilseed rape (*Brassica napus sp.*), broadleaved dock (*Rumex obtusifolius*), spear thistle (*Cirsium vulgare*), common ragwort (*Jacobaea vulgaris*), creeping buttercup (*Ranunculus repens*), bracken (*Pteridium aquilinum*), nettle (*Urtica dioica*), foxglove (*Digitalis purpurea*), red clover (*Trifolium pratense*), ribwort plantain (*Plantago lanceolata*) and herb robert (*Geranium robertianum).* Numerous hawthorn (*Crateagus monogyna*) and sycamore (*Acer pseudoplatanus*) saplings are also present within the area of the site.
J.4	**Hardstanding and baregound (J.4):** The hardstanding pathways and slab immediate to and surrounding the building.
J.3.6	**The Buildings (J.3.6):** The buildings – the former dwellings – which are to be demolished to make way for the development.
------	**Defunct Hedge – Species-poor (J.2.1.2) alongside a stone wall (J.2.5):** The stone wall and defunct hedge which demarcates the boundary between the site and roadway to the north. The wall extends to the east of the site. Species present within the hedge include hazel (*Corylus avellana*), ivy (*Hedera helix*), wild privet (*Ligustrum vulgare*) and sycamore, with an understorey of bramble and nettle.
.....	**Wall (J.2.5):** The stone wall which demarcates the site's south boundary, which extends from the roadway to the treeline. Ivy is present in some areas.
TN1	**Target Note 1 (TN1):** The position of some Japanese Knotweed (*Fallopia japonica*) within the neighbouring garden. This extends to the site boundary.
TN2	**Target Note 2 (TN2):** The position of some Montbretia (*Crocosmia x crocosmiiflora).* It is not within the proposed works area.
TN3	**Target Note 3 (TN3):** The position of a tree which contains potential roosting features (PRFs) for bats. It is not within the proposed works area or ownership.

3.2.2. Species Surveys

A methodical search was undertaken for the following species, or field signs or other evidence thereof. In addition, the site and its immediate surrounds were assessed for their potential to support the following species, or to provide other ecological services to the following species:

- ***Wild Birds:*** The areas of tall ruderal vegetation colonising the site and the species-poor hedge which demarcates the site's north boundary will both provide a limited source of direct and indirect forage for some wild bird species, as well as limited nesting opportunities. In addition, a jackdaw (*Corvus monedula*) was observed nesting within the former dwelling and a blue tit (*Cyanistes caeruleus*) was observed nesting beneath the eaves of the building.

- ***Bats:*** Preliminary roost assessments were undertaken of the former dwellings to be demolished, each of which were categorised as having high potential to support roosting bats. Accordingly, bat emergence surveys of have been undertaken, the results of which indicate that they support current day roosts for at least one common pipistrelle bat, at

least one soprano pipistrelle bat, and at least five lesser horseshoe bats and as a night roost by lesser horseshoe bats.

In addition, based upon a ground-level tree assessment, a tree which is outside the site boundary (and not within the same ownership) but within 50m of the site was categorised as containing potential roosting features suitable for use by multiple bats (PRF-M).

A detailed description of each of the buildings, the full details and the results of the bat emergence surveys undertaken, can be found within the associated document *Dwellings at 38/40 Westminster Road, Moss.; Protected Species Survey Report (Bats)*.

- ***Badger:*** No records of badgers were retrieved during the desk study, and no badgers, setts, latrines, or evidence of badger foraging activity was found within the site or its immediate surrounds. However, given that some of the habitats surrounding the site are considered generally well-suited to the needs of the species, the absence of the species from the surrounding area should not be assumed in the absence of further survey work.

- ***Arboreal Mammals (Hazel Dormouse, Red Squirrel and Pine Marten):*** No local records of any arboreal mammal species were retrieved during the desk study and the site is not within a designated *Red Squirrel Area* per *DataMapWales* (Welsh Government, 2021). Further, the habitats within and immediately surrounding the site are considered wholly unsuited to the needs of such species. As such, the absence of such species from the site and its immediate surrounds can be assumed.

  Riparian Mammals (Otter and Water Vole): The habitats within and immediately surrounding the site are considered wholly unsuited to the needs of riparian mammals and there are no watercourses or waterbodies within 100m of the site. Therefore, the absence of such species from the site and its immediate surrounds can be assumed.

- ***Common Herpetofauna (Reptiles and Amphibians):*** The terrestrial habitats upon and immediate to the site, which comprise a mosaic of bare ground, disturbed land, a small block of woodland and hedgerows are suited to the needs of most common herpetofauna. As such, in the absence of further survey work, the presence of common herpetofauna upon the site should be assumed. Records of great crested newt were retrieved during the desk study. However, these were approx. 800m from the site, beyond Moss Valley. Therefore, it is considered unlikely that great crested newt will be present upon the site or within its immediate surrounds.

- **Other Priority Wildlife:** No other protected species or species of principal importance, or evidence thereof, were found during the survey of the site and its immediate surrounds.

- **Invasive Non-native Species (INNS):** Japanese knotweed has been identified within the garden area of the neighbouring property (see TN1) and extends to the site boundary. In addition, montbretia has been identified within 50m of the site boundary (see TN2).

4. Evaluation and Recommendations

4.1. Habitats

4.1.1. Habitats to be lost

The proposed development will require the demolition of the existing buildings and the clearing of the vegetation and soil to the rear thereof. It will also result in the loss of the disturbed land. Aside from when used by roosting bats or nesting birds (see Section 4.3), buildings are generally considered habitats of low ecological value, as is disturbed land. As such, subject to the adoption of suitable reasonable avoidance measures (bats and nesting birds) and the delivery of suitable compensatory roosting and nesting opportunities on-site, the loss of these extant habitats is likely to have an adverse ecological impact of only low local significance.

However, it is noted that the disturbed land to be cleared was created within the last two years, when seven mature trees planted within the area were felled. In the absence of any mitigating factors, the loss of these trees is expected to have had an adverse ecological impact of moderate local significance.

4.1.2. Habitats to be created

Per Planning Policy Wales XII, any trees felled to facilitate such a development must be replaced with at least 3 trees of a similar type and size. Therefore, at least 21 trees – native provenance ash, hazel, birch, oak, or similar; conforming to heavy standard nursery spec. – will be planted on-site (or off-site, as may be necessary).

It is understood that the development is to incorporate a landscaping scheme, designed to ensure that the development results in a clear net benefit to biodiversity. It is understood that a suitably qualified ecologist will be instructed to provide input to develop this scheme, which will include the planting of suitable replacement trees, as well as the creation of other habitats on-site to provide compensation for any others to be lost and to ensure that the total provision post-development is greater than at present/prior to the felling of the trees.

4.2. Protected Species

4.2.1. Wild Birds

To avoid disturbing or causing harm to the birds nesting within the buildings to be demolished, the demolition works will be undertaken outside of the peak nesting season for the species involved (March to August, inclusive). Further, compensatory nesting opportunities for the nesting sites to be destroyed will be provided via the erection of 1 No. Vivara Pro Jackdaw WoodStone Nest Box and 2 No. Woodstone Seville 28mm Nest Box upon suitable trees on site.

Subject to the delivery of the above, and subject to the implementation of a suitable sensitive landscaping scheme (see above), the nesting opportunities available on-site post-development are likely to be greater than are available at present. As further biodiversity enhancement provisions, it has been agreed that a 1 No. Vivara Pro Seville Nest Box, 1 No. Vivara Pro House Sparrow WoodStone Nest Box (Double Chamber), 1 No. Vivara Pro Build-In Swift Nest Box will be installed on the new dwellings.

In addition, to avoid disturbing or causing harm to nesting birds or their nests during the other site clearance (vegetation clearance) works, all such works will be undertaken in accordance with pre-defined reasonable avoidance measures. The reasonable avoidance measures detailed within Appendix 2 is considered suitable for the project.

4.2.2. Bats

The survey results indicate that the dwellings to be demolished support current day roosts for at least one common pipistrelle bat, at least one soprano pipistrelle bat, and at least five lesser horseshoe bats and as a night roost by lesser horseshoe bats.

The proposed works will result in the destruction of the identified roosts and, in the absence of mitigation, have the potential to disturb or cause harm to any bats which are present at the time. A European Protected Species Mitigation License (EPSML) from Natural Resources Wales will therefore be required before site works can commence.

As a requirement of the license, the works will need to be undertaken in accordance with pre-defined reasonable avoidance measures and suitable compensatory roosting opportunities will need to be provided for those to be lost. The reasonable avoidance measures and mitigation and compensation scheme detailed within the associated document *Dwellings at 38/40 Westminster Road, Moss.; Protected Species Survey Report (Bats)* is considered suitable for the project.

In addition, to ensure that the compensatory bat roosts to be provided and the flightlines thereto/therefrom will not be affected by any post-development interference, both a sensitive landscaping scheme and sensitive lighting scheme will be submitted to the County Ecologist for approval prior to the commencement of works. The proposed development will then proceed in strict accordance with the approved plans.

4.2.3. Badgers, Common Herpetofauna, and Other Priority Wildlife

Whilst no evidence of badgers, common herpetofauna or other protected species or species of principal importance (e.g., hedgehog) was found within the site area or its surrounds, in the absence of further survey work, their absence from the surrounding area should not be assumed. Therefore, to avoid disturbing or causing harm to any badgers, hedgehogs, or reptiles which may be present or nearby during the other site clearance (vegetation clearance) works, all such works will be undertaken in accordance with pre-defined reasonable avoidance measures. The reasonable avoidance measures detailed within Appendix 2 is considered suitable for the project.

The site is considered wholly unsuited to the needs of and riparian or arboreal mammals.

4.2.4. Invasive Non-native Species (INNS)

Japanese knotweed has been identified within the garden area of the neighbouring property and extends to the site boundary. It is therefore very likely that the soil which is adjacent to the boundary and within the site is contaminated with seeds from the plant. Further, Montbretia has been identified within 50m of the site boundary. Both these species are listed within of Schedule 9 of the *Wildlife and Countryside Act 1981* (as amended). Therefore, to prevent the accidental spread of these species into the wild, especially during the site works, it is recommended that a Management Plan is prepared for treatment or removal.

Appendix 1: Photographs



Figure A1.1: The south boundary (wall) and the hardstanding surrounding the building



Figure A1.2: The north boundary (hedgerow and wall)



Figure A1.3: The disturbed land prior to the summer's vegetation growth.



Figure A1.4: A view towards to buildings with the vegetation growth



Figure A1.5: The montbretia outside the planned works area.



Figure A1.6: The position of the Japanese knotweed in relation to the boundary



Figure A1.7: The vegetation growth upon the north and west sides of the site.

Appendix 2: Precautionary Working Method (Vegetation Clearance)

1. **A suitably qualified ecologist will be appointed as the 'site ecologist' for the duration of the project. Prior to the commencement of the works, the site ecologist will provide all contractors involved with a 'toolbox talk' detailing the legal status of bats, wild/nesting birds, badgers, hedgehogs, and common herpetofauna in Wales, the precautionary working practices to be adopted to avoid disturbing or causing harm to any individuals of these species which may be present, and the procedure to be followed in the event that any individuals of these species are encountered during the works.**

   The site ecologist will be retained on an 'on-call' basis throughout the works.

2. **To avoid disturbance or harm to nesting birds, the vegetation clearance works, as well as any other works to or within 5m of any of the hedgerows or trees, will be undertaken outside of the peak nesting season (March to August, inclusive).**

   If, for any reason, it is necessary to undertake such works within this period, then a suitably qualified ecologist will be engaged to undertake a nesting bird check of the affected vegetation immediately prior to the commencement of the works, with the works only to proceed if no active nests are found. Should any nests be found during the inspection, or during any subsequent or other works, all works will be required to cease and a 5m exclusion area will be established around the identified nest, within which no works will be undertaken until it has been established that all the chicks have fledged.

3. **The vegetation will be removed in a phased manner. The vegetation will first be reduced to a height of no less than 150mm, with all arisings removed the same day, following which the site will be left for a period of no less than 24 hours, following which a ground-level cut will be taken, with all arisings removed the same day. To allow any wildlife present to relocate of its own accord, the works will be undertaken from the centre of the site outwards.**

   If the vegetation is allowed to grow dense prior to these works, then they will be undertaken under the direct supervision of the site ecologist, who will undertake a careful hand search of the vegetation to be reduced/removed immediately ahead of the contractors.

4. **To avoid harm to any wildlife which may stray upon the site during the works period, especially during nighttime hours, any trenches, culverts or workings created in the course of the works will be fitted with sloping escape ramps, which may be achieved by edge profiling of trenches/excavations or by placing rough-sawn planks into them at the end of each working day.**

   Any stacks of brash or piles of excavated soil will be inspected for the presence of protected/priority wildlife before they are removed. Chemicals will be kept secure, and the site will be made safe at the end of each working day.

5. **If any common herpetofauna (other than great crested newt), or other species of principal importance (e.g., hedgehog), are found during the works, the site ecologist will capture them in a gentle fashion using protective gloves and move them to a safe location outside the working area. In the unlikely event that a badger or great crested newt is encountered, all works will immediately cease, and the site ecologist will contact Natural Resources Wales for advice.**

If any reptiles, frogs, toads or hedgehogs are encountered during any times when the site ecologist is not present, contractors will capture them in a gentle fashion using protective gloves and move them to a safe location outside the working area. If any newts are found, the contractors will aim to take a clear photograph and will contact the site ecologist for advice. If it can be determined that the newt is a smooth or palmate newt, then contractors will be advised to capture and relocate it as above. If a great crested newt is found, or if any badgers of otters are encountered, then all works will immediately cease, and the site will contact Natural Resources Wales for advice, as above. Contractors should not attempt to handle any snake species directly.

Appendix 3: Green Infrastructure Statement

Concept
The 'stepwise approach' must be adopted throughout the design stage of all new developments in Wales. This means that the loss of existing green infrastructure should be avoided whenever possible, and when it is not possible to avoid the loss of or damage to the existing green infrastructure entirely, the extent of the loss or damage should be minimised to the greatest extent possible. When a proposed development poses a risk of harm to green infrastructure, protected habitats or habitats of principal importance, or protected species or species of principle importance, suitable mitigation should be incorporated into the proposed scheme of works to safeguard that green infrastructure/those habitats and species to the greatest extent possible. Finally, if the loss of green infrastructure cannot be avoided, minimised or mitigated for, suitable on-site compensation should be incorporated into the design of the development.

Green Infrastructure To Be Lost
The existing habitats within or immediate to the site are restricted to the building to be demolished and the associated areas of hardstanding, bare ground, and tall ruderal vegetation.

The proposed development will require the demolition of the existing building and the clearing of the vegetation and soil to the rear of the site. Given the state of the existing building and its surrounds and given the nature of the proposals, this is unavoidable.

Aside from when used by roosting bats or nesting birds, buildings are generally considered habitats of low ecological value, as are areas of hardstanding, bare ground, and tall ruderal vegetation.

However, in assessing the likely impact of this proposed development, the following must be considered:

1. Surveys of the building have identified that it is being used as a day roost by individual common pipistrelle bats, by individual soprano pipistrelle bats, and by low numbers of lesser horseshoe bats, as a night roost by lesser horseshoe bats, and as a nesting site by jackdaws and blue tits.

2. The disturbed land to be cleared was created within the last two years, when seven mature trees planted within the area were felled.

As such, in the absence of suitable mitigation and compensation, the proposed development is likely to have an adverse ecological impact of moderate or high local significance, although only low regional significance.

Green Infrastructure To Be Created
As detailed within the associated documents *Dwellings at 38/40 Westminster Road, Moss; Ecological Appraisal* and *Dwellings at 38/40 Westminster Road, Moss; Protected Species Survey Report (Bats)*, suitable reasonable avoidance measures are to be adopted to mitigate the risk of harm to bats and nesting birds during/because of the proposed development, and suitable compensatory and further roosting and nesting opportunities are to be provided on-site for all those to be lost.

As compensation for the habitats to be lost, the development is to incorporate a sensitive landscaping scheme, designed to ensure that the development results in a clear net benefit to biodiversity. It is understood that this scheme will include the planting of suitable replacement

trees for those which have already been felled*[1], as well as the creation of other habitats on-site to provide compensation for any others to be lost and to ensure that the total provision post-development is greater than at present/prior to the felling of the trees.

Total Change in Green Infrastructure
Subject to adherence to/the delivery of the reasonable avoidance measures, precautionary methods of working, and mitigation and compensation schemes detailed within the associated documents *Dwellings at 38/40 Westminster Road, Moss; Ecological Appraisal* and *Dwellings at 38/40 Westminster Road, Moss; Protected Species Survey Report (Bats)**[2], the development may be expected to result in a net benefit for biodiversity/a net gain in green infrastructure.

*1

Per Planning Policy Wales XII, any trees felled to facilitate such a development must be replaced with at least 3 trees of a similar type and size.

*2

Subject to the incorporation and delivery of a suitable sensitive landscaping scheme, to include the planting of suitable replacement trees, as well as the creation of other habitats on-site to provide compensation for any others to be lost and to ensure that the total ecological provision post-development is greater than at present/prior to the felling of the trees.

Subject to adherence to the reasonable avoidance measures detailed within the associated document Dwellings at 38/40 Westminster Road, Moss; Protected Species Survey Report (Bats) *and subject to the delivery of the compensatory and further roosting opportunities detailed within the same*.

Subject to adherence to the reasonable avoidance measures detailed in Section 4.2.1 (Wild Birds) of the associated document Dwellings at 38/40 Westminster Road, Moss; Ecological Appraisal, *and to the delivery of the compensatory and further nesting opportunities detailed within the same.*

Subject to adherence to the precautionary method of working detailed in Appendix 2 (Vegetation Clearance) of the associated document Dwellings at 38/40 Westminster Road, Moss; Ecological Appraisal.

Subject to the delivery of a suitable management plan for the treatment or removal of any invasive non-native species on-site (or soil contaminated thereby) and to adherence to suitable biosecurity measures throughout the proposed development.