BRYMBO HERITAGE AREA:

CONSERVATION PLAN FOR GREAT CRESTED NEWTS

DATE	ECOLOGIST	APPROVED	VERSION	COMMENTS
21/07/2025	Richard Cutts	Keymar Wake	V1	
14/08/2025	Richard Cutts	Keymar Wake	V2	Updated with reference to GCN monitoring program, addition of conservation area maps

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1.0 Introduction

1.1 Enfys Ecology Limited were commissioned by Brymbo Heritage Trust to produce a Conservation Plan for great crested newts (GCN) (*Triturus cristatus*) at Brymbo Heritage Area.

1.2 North East Wales is considered a stronghold for GCN, and a strategic review of the conservation status of GCN in Wales (with specific focus on North East Wales) was produced out by the Amphibian and Reptile Conservation Trust in 2019 (Haysom *et al.,* 2019). This report included recommendations for Key Performance Indicators (KPIs), standard survey methods and collation of monitoring records (via Cofnod, the Local Records Centre for North Wales) in order to continue to track the conservation status of GCN in Wales.

1.3 NRW have also produced an Action Plan for GCN conservation in Wrexham (Russell *et al.*, 2017); Brymbo Heritage Area falls within a 'pond creation area' identified in the Action Plan, where habitat can serve to connect populations of GCN. Conservations efforts at Brymbo Heritage Area should take these strategic views in account, and support the favourable conservation status of GCN within North Wales.

1.4 Enfys Ecology have previously carried out various ecological surveys of Brymbo Heritage Area, including Preliminary Ecological Appraisals and protected species surveys, to support both conservation and development in different areas of the site. This document builds on various reports (listed below), including an overall management plan produced for the site (Yardley, 2018) and a GCN conservation plan associated with works in the Foundry Area of the site (Cutts, 2024).

- Brymbo Heritage Area: Ecological Management Plan (Yardley, 2018)
- Brymbo Heritage Area: Preliminary Ecological Appraisal (Cutts, 2022)
- Brymbo Heritage Area, Proposed Car Park: Ecological *Assessment* (Cutts, 2024)
- Foundry Area: Conservation Plan for Great Crested Newts (Cutts, 2024)
- Wonderbank: Preliminary Ecological Appraisal (Cutts, 2025)

1.5 In 2004, GCN were translocated into the Brymbo Heritage Area from the nearby Brymbo commercial development site under a Welsh Government GCN derogation licence. Mitigation ponds were created for the GCN in the conservation area at the western side of the Brymbo Heritage Area, and permanent newt fencing was erected to separate them from the Steelworks and Fossil Forest areas. Unfortunately, no detailed results from the translocation are available; however, it is thought that approximately 5000 individuals (including eggs) were translocated.

1.6 The ponds have been monitored for GCN by Enfys Ecology since 2018. A small but presumably breeding population of GCN (and other common newt species) was present at the time of the latest surveys (May/June 2025). The terrestrial habitat in the vicinity of the ponds is also highly suitable for GCN.

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1.7 GCN monitoring results for Brymbo Heritage Area from 2018 onwards are summarised in Table 1.1; as multiple surveys are carried out each year only the maximum counts for each pond have been included. Survey effort in 2018 was more intensive than in following years, and also involved bottle trapping. Ponds numbers refer to specific ponds, as detailed in Section 7.1, while the 'drainage pits' have been dry for several years (see Section 7.2.2).

TABLE 1.1. SUMMARY OF GCN MONITORING AT BRYMBO HERITAGE AREA

Year	Pond 2	Pond 3	Pond 4	Drainage pits
2018	4 male; 5 female	11 male; 6 female	2 male; 2 female	3 male; 4 female
2019	15 male; 2 female	24 male; 9 female	14 male; 8 female	3 female
2020	No surveys			
2021	No surveys			
2022	None	1 male; 5 female*	No survey (dry)	No survey (dry)
2023	None	16 male; 7 female	No survey (dry)	No survey (dry)
2024	5 male	None	No survey (dry)	No survey (dry)
2025	1 male; 1 female; 1 unknown	None	No survey (dry)	No survey (dry)

*Data from either Pond 2 or Pond 3; recorded against Pond 4 in error, which was dry in 2022

1.8 This conservation plan covers the entire site, which for the purposes of the conservation plan has been subdivided into different areas with varying suitability for GCN and risk of them being present (see Section 3). High risk areas, where GCN are highly likely to be present, will require certain activities to be carried out under a **GCN mitigation licence from NRW** due to the likelihood of disturbing or harming GCN.

1.9 This document includes an ecological risk assessment to assess the potential for disturbance or harming GCN in different areas of the site, and suitable Reasonable Avoidance Method Statement (RAMS) to be implemented during activities to mitigate for any potential harm.

1.10 It is essential that biosecurity procedures are followed at all times by all workers and visitors to site. Biosecurity procedures are detailed in Section 5.

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2.0 Amphibian Legislation

2.1 Great Crested Newts (GCN) and their habitat are fully protected under both United Kingdom and European Union legislation, including the Wildlife and Countryside Act (WCA) 1981 (as amended), the Countryside and Rights of Way Act (CRoW) 2000 and The Conservation of Habitats and Species Regulations 2017 (as amended).

2.2 It is an offence to kill, injure or disturb GCNs, or to destroy any place used for rest or shelter by a great crested newt. The GCN is listed on Appendix II of the Bern Convention on the Conservation of European Wildlife and Natural Habitats, and is also listed on Annexe II and Annexe IV of the EC Habitats Directive.

2.3 Further detail of the UK legislation protecting GCN is provided in Section 9.

2.4 Common amphibian species (including common frog, common toad, and smooth and palmate newts) have lesser legal protection, under Schedule 5, Section 9 (5) of the WCA 1981 (as amended) and the CRoW Act 2000, these animals are protected from sale, or transportation for sale.

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3.0 Ecological Risk Assessment

3.1 The site has previously been visited by Enfys Ecology for various ecological surveys, including regular monitoring of GCN populations. The latest site visit was carried out by Richard Cutts and Keymar Wake from Enfys Ecology on 16th June 2024, undertaking a site visit to check ongoing consolidation works in the Foundry area, and to discuss GCN conservation within Brymbo Heritage Area.

3.2 *Site Description*

3.2.1 The Brymbo Heritage Area comprises part of the former steelworks area and colliery which, along with a larger area to the east, underwent remediation and clearance works around 2004 to 2008. The Brymbo Heritage Area can be divided into several distinct areas, with the two westernmost sections separated from the rest of the site by GCN exclusion fencing (see Figure 3.1).

1) **The Wonderbank**: The westernmost section of the Brymbo Heritage Area, the Wonderbank is the site of a former colliery spoil heap. It consists of a mixture of young to established woodland, scrub, and semi-improved grassland. The centre of the area is planned to be developed into a solar farm, and was cleared of scrub in 2024.
2) **Conservation area:** The conservation area lies downslope to the east of the Wonderbank, and is separated from the community orchard and Foundry area by the GCN exclusion fencing. It consists of an upper level (the former colliery yard, also referred to as the 'duck pond' area), a steep wooded slope, and a lower woodland area with ponds. Several derelict buildings and structures, associated with a former railway, are also present in the lower area.
3) **Community orchard:** Extending downhill (east) from the conservation area to the Fossil Forest, and to the south of the Foundry area, this consists of a track bounded by narrow strips of woodland. Fruit trees were previously planted here, and the area was intended for use as a community orchard.
4) **Foundry area:** The Foundry area largely consists of buildings and associated hardstanding, situated east of and mostly below the conservation area. An upper level to the south and west includes trees and a single structure (the 'Agent's House'). Surface water in this area has historically been iron-stained due to run-off from a mine adit.
5) **Car park:** The car park lies immediately to the west of the Foundry area and to the north of the Fossil Forest. Formerly an open area of ephemeral/short perennial vegetation and semi-improved grassland, the southern part of this area was developed into a car park for the Brymbo Heritage Area in 2024/2025. The northern part also includes a steep, wooded slope.
6) **Fossil Forest:** The Fossil Forest is in the south-eastern corner of the site, and is an open area consisting of a mixture of bare ground (including rock exposures) with patchy ephemeral/short perennial vegetation, semi-improved grassland and scattered scrub. This area also contains a temporary structure which has been installed to enable excavation, preparation and interpretation of fossil plants; this section of Brymbo Heritage Area has been designated as a Site of Special Scientific Interest (SSSI) due to the fossil flora.

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3.3.2 Existing GCN conservation work is focussed on the Conservation area, mainly in the area around the ponds, although most of this area is suitable for GCN and can be managed for them. A new conservation area for GCN has also been proposed in the south and west of the Wonderbank, which could be managed for GCN habitat and may be suitable for the creation of new ponds; this will be investigated further with input from an expert (see Sections 7.2.5 and 7.3.5).

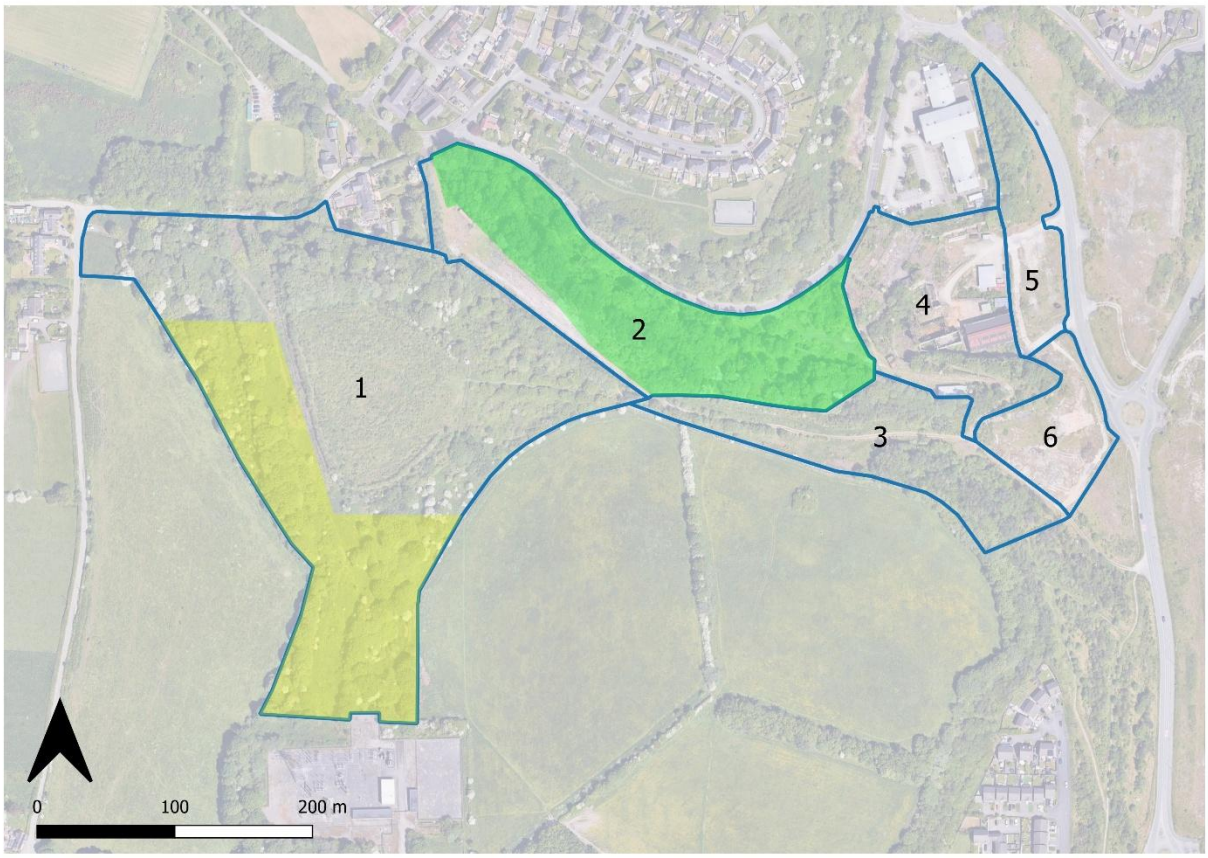


FIGURE 3.1: SITE MAP (NUMBERS REFER TO AREAS DESCRIBED IN SECTION 3.2.1); EXISTING AND PROPOSED GCN CONSERVATION AREAS ARE SHOWN IN GREEN AND YELLOW, RESPECTIVELY.
BACKGROUND IMAGE ©GOOGLE MAPS 2025

3.2.2 The surrounding area is dominated by agricultural fields and scattered urban areas, with urban density increasing towards the east. Blocks of woodland provide a good degree of habitat connectivity within the wider landscape, supplemented by hedgerows on field boundaries, including within/between some of the urban areas; the most contiguous tracts of woodland follow watercourses, the closest of which are 1.3km and 1.8km to north and south of the site, respectively. Upland areas, including heathland, lie just over 3.3km to the south-west. Part of the former steelworks lies to the east of the survey area, beyond a trunk road, and consists of a mixture of bare ground with patchy vegetation, semi-improved grassland and scattered scrub. The wider area is shown in Figure 3.2 below.

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FIGURE 3.2: WIDER SITE LOCATION – THE SITE BOUNDARIES ARE SHOWN BY THE BLUE OUTLINE.
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3.3 *Risk Assessment*

3.3.1 GCN and smooth newts were recorded in the northern part of Brymbo Heritage Area prior to 2004. In 2004, GCN were translocated into Brymbo Heritage Area from the nearby Brymbo commercial development site under a Welsh Government GCN derogation licence. Mitigation ponds were created in the western part of the Brymbo Heritage Area, approximately 100m west of the steelworks area, and are separated from the Steelworks and Fossil Forest by permanent newt fencing (see Section 4).

3.3.2 The ponds in the conservation area have been monitored for GCN by Enfys Ecology since 2018. A small but presumably breeding population of GCN (and other common newt species) was present at the time of the latest surveys (May/June 2025). The terrestrial habitat in the vicinity of the ponds is also highly suitable for GCN.

3.3.3 The presence of GCN exclusion fencing will act as a barrier to the dispersal of GCN within the Brymbo Heritage Area. Areas 'within' the fence (the Wonderbank and the conservation area)

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are therefore considered to have a **moderate to high risk** of GCN being present, depending on habitat suitability.

3.3.4 All other areas are 'outside' the fence and therefore GCN should not be expected to be present. These areas are therefore considered to have a **negligible to low risk** of GCN being present.

3.3.5 However, it is noted that GCN could bypass the ends of the exclusion fencing along field margins (western end) or, less likely, along the adjacent road (eastern end). GCN could also pass over the fence at times when vegetation has been allowed to overlap the fencing. It is also possible that, if GCN have repopulated areas to the east and south of the site, that they could migrate into Brymbo Heritage Area from that direction. Therefore, their presence in areas 'outside' of the fence cannot be entirely ruled out, although high populations are not anticipated.

3.3.6 The nearest pond outside of Brymbo Heritage Area is at Mount Sion, approximately 200m north-west of the Wonderbank. Cofnod records show that a GCN was recorded from the road close to this pond in March 2025.

3.3.7 The risk assessment for each area of the Brymbo Heritage Area is provided in Table 3.1, and is based on the following periods of GCN activity (note that these are approximate timings only and may vary each year due to weather conditions):

- GCN will be **present in ponds and other bodies of standing water between February and September**.
- GCN will **forage in terrestrial habitats between May and November**.
- GCN will begin to move to hibernation sites from September onwards, and **will hibernate in place during winter months**, moving back towards breeding sites from February.

3.3.8 As the presence of individual GCN and common amphibians cannot be entirely ruled out in any areas of the site, Reasonable Avoidance Measures (RAMs) must be followed at all times by all staff, volunteers and contractors working on the site (see Section 6).

3.3.9 Activities in high risk areas, where GCN are highly likely to be present, may require a **GCN mitigation licence from NRW** due to the likelihood of disturbing or harming GCN. **No works should be carried out in these areas without prior consultation with an ecologist and/or NRW**.

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TABLE 3.1. GCN RISK ASSESSMENT FOR BRYMBO HERITAGE AREA

Area	Habitat	Risk assessment
Wonderbank	Scrub/woodland	**Moderate to high risk** of commuting/foraging/sheltering GCN being present. **High risk** of hibernating GCN being present.
	Grassland and cleared ground	**High risk** of commuting/foraging/sheltering GCN being present. **High risk** of hibernating GCN being present in habitat piles, plant roots or topsoil.
	Ditches	**Negligible risk** of breeding GCN being present. **High risk** of commuting/foraging/sheltering GCN being present. **High risk** of hibernating GCN being present.
Conservation area	Ponds	**High risk** of breeding GCN being present. **High risk** of commuting/foraging/sheltering GCN being present close to pond margins.
	Woodland	**High risk** of commuting/foraging/sheltering GCN being present. **High risk** of hibernating GCN being present.
	Bare ground/ephemeral vegetation/grassland	**Moderate risk** of commuting/foraging/sheltering GCN being present, increasing to **high risk** in taller grass/vegetation. **High risk** of hibernating GCN being present in habitat piles, plant roots or topsoil.
	Ditches and drainage pits	**Negligible risk** of breeding GCN being present. **High risk** of commuting/foraging/sheltering GCN being present. **Moderate risk** of hibernating GCN being present.
Community orchard	Woodland/orchard	**Low risk** of commuting/foraging/sheltering GCN being present. **Low risk** of hibernating GCN being present.
	Bare ground and grassland	**Negligible risk** of commuting/foraging/sheltering GCN being present, increasing to **low risk** in taller grass/vegetation. **Low risk** of hibernating GCN being present in habitat piles, plant roots or topsoil.
Foundry area	Bare ground/ephemeral vegetation	**Negligible risk** of commuting/foraging/sheltering GCN being present. **Low risk** of hibernating GCN being present in habitat piles, plant roots or topsoil.
	Hardstanding	**Negligible risk** of GCN being present.
	Ditches/standing water	**Negligible risk** of GCN being present.

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Area	Habitat	Risk assessment
Car park	Bare ground/gravel	**Negligible risk** of GCN being present.
	Ephemeral vegetation and grassland	**Negligible risk** of commuting/foraging/sheltering GCN being present, increasing to **low risk** in taller grass/vegetation. **Low risk** of hibernating GCN being present in habitat piles, plant roots or topsoil.
	Woodland	**Low risk** of commuting/foraging/sheltering GCN being present. **Low risk** of hibernating GCN being present.
Fossil forest	Bare ground/rock exposures	**Negligible risk** of GCN being present.
	Ephemeral vegetation and grassland	**Negligible risk** of commuting/foraging/sheltering GCN being present, increasing to **low risk** in taller grass/vegetation. **Low risk** of hibernating GCN being present in habitat piles, plant roots or topsoil.
	Ditches/standing water	**Negligible risk** of breeding GCN being present. **Low risk** of commuting/foraging/sheltering GCN being present. **Negligible risk** of hibernating GCN being present.

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4.0 Amphibian Exclusion Fencing

4.1 Amphibian exclusion fencing was previously installed in Brymbo Heritage Area in 2004 under the Welsh Government GCN licence for clearance of the wider Brymbo Steelworks area, and has been subsequently maintained by Brymbo Heritage Trust staff and volunteers (Figure 4.1). The fencing continues to the west partway along the southern boundary of the Wonderbank.

4.2 The fencing is of a permanent type, and the fencing within Brymbo Heritage Area was fully inspected during the site visit on 8th March 2024 and was found to be intact and in good condition (Figures 4.2, 4.3 and 4.4). The amphibian exclusion fencing along the southern edge of the Wonderbank was inspected on 28th March 2025, and was found to be overgrown and partially collapsed at its western end (Figures 4.5 and 4.6).

4.3 Amphibian exclusion grilles were installed on access points between the conservation area and the Foundry/community orchard (Figures 4.7 and 4.8), and alongside Blast Road (Figure 4.9).

4.4 A small fenced out area, with an amphibian exclusion grille, is also present at the western end of the conservation area and is being used as a materials storage area.

4.5 The integrity of the exclusion fencing **must be maintained throughout all of the construction works planned for the Brymbo Heritage Area**, including keeping it free from vegetation. Regular checks should be carried out to ensure that any defects are promptly identified and fixed. Sections of fence must not be removed, even temporarily, to allow access elsewhere within Brymbo Heritage Area.

4.6 The amphibian exclusion fencing could be removed in the future following completion of major works at Brymbo Heritage Area, and would open up the rest of the site for GCN.

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Figure 4.1: Location of the amphibian exclusion fencing (purple) and amphibian exclusion grilles (yellow diamonds).
Background Image © ©Google Maps 2025.



Figure 4.2: Amphibian exclusion fencing, northern end



Figure 4.3: Amphibian exclusion fencing, Western end

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Figure 4.4: Continuation of Amphibian exclusion fencing beyond the western site boundary



Figure 4.5: Amphibian exclusion at the southern edge of the Wonderbank, view towards Brymbo Heritage Area (east)



Figure 4.6: Amphibian exclusion at the southern edge of the Wonderbank, view away from Brymbo Heritage Area (west)



Figure 4.7: Amphibian exclusion grille at the northern end of the fencing, adjacent to Blast Road

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FIGURE 4.8: CENTRAL AMPHIBIAN EXCLUSION GRILLE, CLOSEST TO THE DEVELOPMENT AREA



FIGURE 4.9: AMPHIBIAN EXCLUSION GRILLE AT THE WESTERN END OF THE FENCING

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5.0 Biosecurity Risk Assessment and Control Methods

5.1 Biosecurity means taking measures to ensure that good practices are in place to minimise the risk of importing and spreading invasive non-native species (INNS), pests and infectious disease. As non-native species or diseases could be transmitted in any water or material, a good biosecurity routine is essential, even if invasive non-native species are not apparent.

5.2 No strictly aquatic/aquatic-marginal INNS are known to be present on this site; however, INNS may be present in the vicinity, and there is a risk of inadvertently spreading INNS into adjacent habitats. There is also a risk of spreading chytrid fungus to the local GCN population.

5.3 Non-aquatic INNS recorded within the Brymbo Hertiage Site include Japanese knotweed (only present on the Wonderbank), *Cotoneaster* and *Buddleja*. While these will not directly impact GCN, they may reduce the quality of foraging habitat if they become dominant and, in the case of knotweed, can cause de-stabilisation of pond edges.

5.4 A biosecurity risk assessment is provided in Appendix A, summarising the risk at this site, and additional measures required to prevent the spread of INNS and pathogens.

5.5 Biosecurity measures help to prevent the spread of INNS and pathogens, and the following should be implemented for works in or near the ponds; it is also recommended that they are followed as best practice for *any* works in the site:

- A tool box talk should be provided for staff, volunteers and contractors covering the biosecurity risk assessment, relevant control measures and general biosecurity procedures.

- A cleaning station could be set up at the site entrance to facilitate washing boots, clothing, tools, and vehicles.

- Footwear of staff entering or leaving the site (for any reason and no matter for how short a time) should be cleaned (i.e., visually free of soil and debris). Soil and vegetation should be washed off with clean water (and brushes). Water should then be disposed of by pouring on site to soak away, ensuring this does not enter any watercourses.

- The wheels or tracks of all vehicles (and any other part which has come into contact with soil) must be thoroughly washed and be free of soil and debris before entering or leaving the site.

- Following the removal of organic material, footwear, equipment and tyres/tracks must be sprayed or dipped in disinfectant (Virkon; 10mg/ml or as printed instruction if, for example, using tablets) until it runs off. Spraying should take place away from vegetation.

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- Virkon solution should be rinsed off using clean water at least one minute after application. The solution should ideally be kept and flushed into a sink, or drain with water. If on site disposal is required the solution should be disposed of on a large hardstanding area away from vegetation.

5.6 Landscaping or planting must not include any plants listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), even if they are commercially available (e.g. cotoneasters, montbretia), or other plant species with a high risk of spreading in the wild (e.g. *Buddleja davadii*).

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6.0 GCN Method Statement and Reasonable Avoidance Measures

6.1 Due to the potential presence of GCN within the site, Reasonable Avoidance Measures (RAMs) should be followed at all times in order to minimise the risk of disturbance or harm to GCN. Suitable RAMs for various tasks are suggested in the following sections.

6.2 *European Protected Species Licence (EPSL)*

6.2.1 Due to the moderate to high risk of encountering GCN when working 'within' the GCN exclusion fencing (the Wonderbank and conservation area), **an EPSL is likely to be needed for any activities in these areas**. Unless a licence is in place, a suitably experienced ecologist and/or NRW must be consulted before commencing any works in these areas.

6.2.2 Due to the negligible to low risk of encountering GCN in areas 'outside' the GCN exclusion fencing (community orchard, Foundry area, car park and Fossil Forest), an EPSL may not be required for works in these areas. However, it is still recommended that advice from a suitably experienced ecologist and/or NRW is sought before commencing works.

6.2.3 If any point an ESPL is required to enable works, then the wider conservation goals must be considered and any planned conservation-related works should also be included within the licence application.

6.2.4 Specific working methods for tasks detailed in an ESPL will supersede any avoidance measures and working methods provided in this document.

6.3 *General RAMs*

6.3.1 It is recommended that a generic tool box talk (TBT) is available for all staff, volunteers and contractors working on the site, detailing GCN identification and ecology, and summarising the information contained within this conservation plan. A specific TBT will be required for any activities being carried out under an EPSL.

6.3.2 Activities should be timed to minimise the risk of disturbance of or harm to GCN:

- There **must be no works on (or adjacent to) ponds between February to September**, inclusive, as there is a high risk of disturbing/harming breeding or juvenile GCN during this time period.

- **Habitat piles (natural or artificial, including piles of waste, brash or building materials) must not be disturbed when GCN are hibernating**, as hibernating GCN are liable to be killed if disturbed; the period between October and April should be avoided, or when daytime temperatures are below 10°C.

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- **Destructive groundworks, including the removal of plant roots, should also avoid the hibernation period.**

- Low-level vegetation clearance (e.g. strimming or mowing) should avoid the period between May and November (inclusive) wherever possible.

6.3.3 Vehicle access should be restricted to existing tracks, areas of hardstanding, or short (<10cm) grassland. If new access routes are required, this should be discussed with an ecologist/NRW prior; existing exclusion fencing should not be removed or modified without consultation, and new access tracks must be created by reducing vegetation to ground level following the methods detailed in Section 6.5, below.

6.3.4 To prevent the spread of disease between amphibian populations, **biosecurity procedures should be followed at all times when working in areas 'within' the exclusion fencing**; these are detailed in Section 5.

6.3.5 **If at any point GCNs are encountered in any working area, all works must immediately cease. If an ecologist is not already present they should be called immediately.**

6.4 *Habitat piles and refugia*

6.4.1 Material and habitat piles can provide places of shelter or hibernation for GCN and other amphibians and **must not be disturbed during the hibernation period or during periods of cool weather** (see Section 6.3).

6.4.2 **Any construction materials stored in areas 'within' the fence must be stored off the ground** (e.g. in bulk bags or raised on pallets) to prevent GCN seeking shelter within them. It would also be good practice to store materials off the ground elsewhere on the site.

6.4.3 **Brash, rubble, materials or other waste in areas 'within' the fence must be removed by hand rather than machinery**; again, it would also be good practice to do this in areas 'outside' the fence.

6.5 *Vegetation clearance*

6.5.1 Taller vegetation should be strimmed to 10cm and the arising removed from the works area immediately after strimming. If vegetation height needs to be further reduced, the strimmed area will then be left for a minimum of 24 hours; any amphibians, including GCN, that may have been present within this area would then be active and encouraged to leave of their own accord.

6.5.2 If vegetation height needs to reduced to ground level (e.g. to discourage any amphibians from returning to a works area), this should be carried out following a visual and fingertip search of the works area by a licensed ecologist.

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6.5.3 Large areas of vegetation should be cleared working in a directional manner, moving towards an area or retained taller vegetation (e.g. woodland edge or rough grassland).

6.5.4 Any brash piles generated during vegetation clearance will be considered habitat piles and subject to the RAMs listed above (Section 6.4).

6.6 *Persons responsible for implementing works*

6.6.1 Brymbo Heritage Trust will be responsible for all staff, volunteers and contractors working on the site.

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7.0 GCN Conservation Plan

7.1 *Existing Ponds: Conservation Area*

7.1.1 Four ponds are present in the lower part of the conservation area, of which at least one is known to host a (presumably breeding) population of GCN. The ponds are labelled in Figure 7.1 and their current status is discussed in the following sections.



FIGURE 7.1: POND LOCATIONS WITHIN THE CONSERVATION AREA.
BACKGROUND IMAGE ©GOOGLE MAPS 2025

7.1.2 Pond 1 is the westernmost pond, and is effectively an area of relatively shallow standing water where a stream is filling a depression; water levels appear to fluctuate due to influx from the west and outflow/percolation towards the east. The pond margins are overgrown and poorly defined in places, and the water body measures approximately 10m by 6m. At the time of the latest monitoring visits (May/June 2025), the pond was heavily overshaded and the surface was largely covered by duckweed. This pond has only been monitored since 2024 and low numbers of smooth/palmate newts, but no GCN, have been observed in this pond.

7.1.3 Pond 2 is the largest and deepest pond, measuring approximately 8m by 8m. It contains submerged and floating vegetation which would be suitable for GCN egg laying. At the time of the latest monitoring visits (May/June 2025), it was observed that leaf litter had built up

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significantly on the base of the pond, and overshading from trees in/around the ponds had also notably increased. Low numbers of GCN and other newt species have been consistently recorded from this pond for several years.

7.1.4 Pond 3 is a shallow pond measuring approximately 6m by 6m. On monitoring visits in 2023 it was noted that dense leaf litter was filling the pond, leaving only a small water column, and the pond had dried out completely in June 2023. The pond has remained choked with vegetation, with little open water, on subsequent visits. Low numbers of smooth/palmate newts, but not GCN, have occasionally been recorded in this pond.

7.1.5 Pond 4 is a shallow depression measuring approximately 5m by 5m, a short distance to the east of the other ponds. A small amount of open water was observed here in 2017, but the pond was dominated by pendulous sedge, hard rush and willow saplings. The pond has been consistently dry on subsequent monitoring visits, and does not appear to hold water during the GCN breeding season.

7.1.6 Ponds 1 to 3 contain aquatic/aquatic marginal vegetation suitable for GCN shelter and egg laying (e.g. bulrush, soft rush and water mint), and are surrounded by tall ruderal vegetation which would provide cover and foraging habitat. However, their suitability for GCN is being reduced by overshading, plant spread and build-up of leaf litter. To maintain and enhance these ponds for GCN, the ponds should be checked annually late spring/early summer and the following actions are recommended (note that works on the ponds should only be carried out in autumn/early winter; see Section 6.3.2):

- Trees, shrubs and ruderal vegetation should be cut/strimmed back to reduce overshading of the ponds; ideally no more 60% of the pond perimeter should be shaded.

- Aquatic plants (not including duckweed) should cover around 60% to 90% of the pond surface, and should be thinned out if their cover gets too high.

- Duckweed should be manually cleared if it starts to dominate the pond surface.

- Excessive leaf litter build up should be manually removed; care must be taken when removing leaf litter as GCN and other amphibians can shelter in material on pond floors throughout the year.

7.1.7 Water levels in the ponds should be regularly checked throughout the GCN breeding season. Intervention may be required if a pond fails to consistently hold water, which could involve:

- Reprofiling the pond, to create a deeper central section and shallower margin.

- Lining the pond with clay or membrane.

7.1.8 It has been proposed that a dam is installed in the woodland immediately west of Pond 1, to help regulate water flow into the ponds; run-off from the adjacent road can cause high water flux in this area. A series of (three or more) 'leaky' wooden dams would be the most suitable

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solution, as these would allow for a more continual release of water towards the ponds while reducing the risk of sudden flooding.

7.1.9 As Pond 4 is dry, it would require reprofiling and likely lining in order to retain water. However, given its small size and relative isolation from the highest quality terrestrial habitat, this pond will be less suitable for breeding GCN and its is lower priority than improvements to the other ponds, or the creation of new ponds.

7.2 *New Ponds*

7.2.1 Several potential sites for additional ponds within Brymbo Heritage Area have been investigated.

7.2.2 Three drainage pits are present on the upper level on the conservation area, a short distance south-west and upslope of the existing ponds, and have previously been considered for modification into ponds. This location is well positioned at the edge of high-quality terrestrial habitat and close to the existing ponds. One of these drainage pits was previously infilled under licence in 2017/2018 (Yardley, 2018); it is recommended that the other two are converted into ponds (Figure 7.2).



FIGURE 7.2: LOCATIONS OF DRAINAGE PITS (BLUE RECTANGLES); EXISTING PONDS ARE TO THE NORTH-EAST.

BACKGROUND IMAGE ©GOOGLE MAPS 2025

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7.2.3 The drainage pits are shallow gravel-filled depressions contained within low bunds, and are currently covered by vegetation including willow scrub. Neither of the pits appears to hold water for a prolonged period of time, although they may be seasonally wet.

7.2.4 **An EPS licence will be required for the creation of the ponds**, which will involve:

- Removal of vegetation and stripping gravel.
- Reprofiling to create a shelf and a deeper (1m to 3.5m deep) central basin.
- Lining with clay or membrane in order to retain water.

7.2.5 Locations around the Wonderbank have also been investigated for the location of additional ponds:

- The central area of the Wonderbank has a clay cap that was installed to prevent the release of contaminants from the former colliery/steelworks waste; excavation of this area to create a pond/ponds could cause the integrity of this seal to be compromised.
- The wooded slopes around the margins of the Wonderbank are too steep to fit in reasonably-sized ponds.
- Flatter, more open areas on the southern and western sides Wonderbank could be considered for additional ponds but are currently used for access and infrastructure, and the clay cap may extend into this area.

7.2.6 The feasibility of creating new ponds for GCN in the southern and western parts of the Wonderbank will be investigated further. The intention to is to create at least two new ponds within the Wonderbank and specialist advice will be sought for pond creation on difficult terrain in every effort to accomplish this. Pond specifics will be included within an EPS licence application.

7.2.7 Additional ponds could be created with the community orchard area, ideally to the north of the track and along the woodland edge. This area currently lies 'outside' the amphibian exclusion fencing and is technically inaccessible to GCN (see Section 3.3) at present, but would provide suitable habitat and connectivity if the fencing is removed or rerouted.

7.2.8 The Foundry area and car park have no suitable areas for creating ponds, given the amount of hardstanding present/planned in these areas. This area also currently lies 'outside' the amphibian exclusion fencing and is technically inaccessible to GCN (see Section 3.3).

7.2.9 The Fossil Forest is a SSSI and excavation in this area (barring permitted activities relating to the extraction of fossils) should be avoided, making it unsuitable for pond creation at present. This area also currently lies 'outside' the amphibian exclusion fencing and is technically inaccessible to GCN (see Section 3.3). However, in the longer term, ponds could

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be created along the south-western edge of this area, where they would have good habitat connectivity.

7.2.10 Any new ponds that are created will need surrounding vegetation thinned to reduce overshading, and then maintained in the same way as the existing ponds (Section 7.1.6).

7.2.11 Establishment of aquatic/aquatic marginal vegetation can be encouraged by planting or seeding appropriate species (Langton *et al.*, 2001; see Figure 7.3). This could include transplants from existing ponds, as plants are removed through maintenance thinning; however, biosecurity measures must be followed to prevent the spread of pathogens and invasive non-native species between water bodies (see Section 5 and Appendix A).

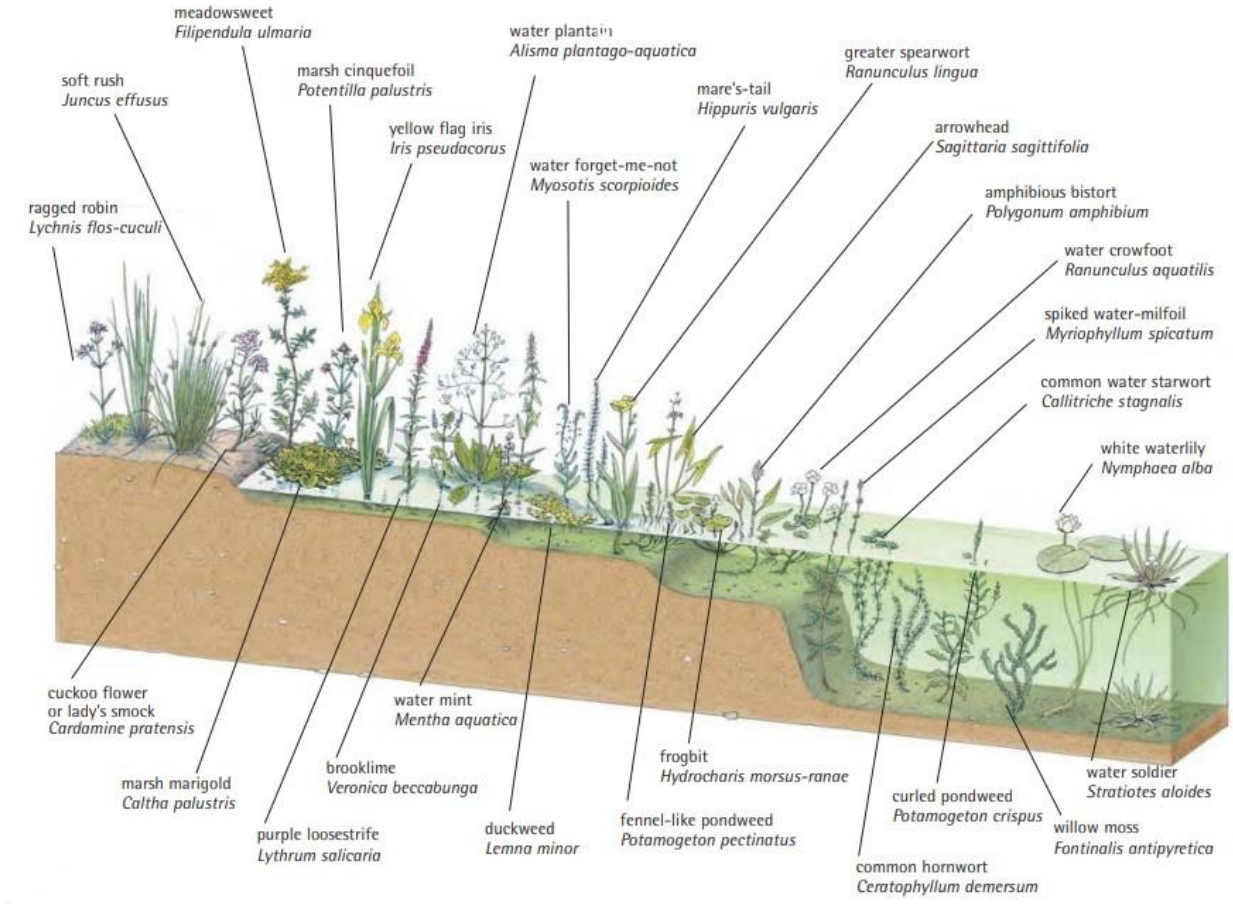


FIGURE 7.3: EXAMPLES OF AQUATIC/AQUATIC MARGINAL PLANTS SUITABLE FOR GCN BREEDING PONDS.

IMAGE ©LANGTON ET AL., 2001

7.3 *Habitats*

7.3.1 The existing habitats in the conservation area provide high quality foraging and commuting habitat for GCN. Management of this area should focus on maintaining a mixture of habitats in the vicinity of ponds and preventing overgrown/rank vegetation becoming dominant.

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Taller vegetation (grasses, ruderal species and scrub/shrubs) should be cleared in stages as required, without reducing large areas of tall vegetation to areas of short sward in a single year; management should aim for a mixture of vegetation heights in areas close to the ponds.

7.3.2 More established woodland on the Wonderbank provides high quality foraging and community habitat, and a wooded corridor should be maintained along the northern edge of this area to help provide connectivity with ponds to the north-west.

7.3.3 Areas of dense, young scrub in the Wonderbank provides low to moderate quality habitat for GCN, as ground flora is generally lacking. These could be improved by thinning, and opening up larger glades or rides would also diversify the habitat. Management of the scrub should focus on selective clearance to open up the structure and encourage establishment of ground cover.

7.3.4 Grassland will be established in the central area of the Wonderbank, where a solar farm will be situated, and will be maintained as rough pasture through low-pressure grazing; this will provide higher quality foraging habitat than previous habitat in this area (dense scrub/bare ground). Sward height should be regularly monitored to prevent overgrazing. It is also recommended that strips of taller vegetation (e.g. taller grasses and ruderal species), ideally no less than 2m wide, are maintained around the perimeter of the grassland, and between tracks and the edges of woodland/scrub.

7.3.5 The establishment of a GCN conservation area has been proposed in the southern and western parts of the Wonderbank (see Figure 3.1). The suitability and extent of this area will be investigated further, with advice sought from experts; appropriate habitat management (as per existing GCN ponds; Section 7.3.1) will be required once suitable locations for new ponds have been determined (see Section 7.2.5).

7.3.5 Management of other parts of Brymbo Heritage Area can be managed with a view to improving habitat for GCN. While GCN are currently considered unlikely to be present in these areas, these habitat improvements would be beneficial for a range of other species and the GCN exclusion fencing may be removed in the longer term and:

- Community orchard: Maintain a moderate sward in areas of grassland, selectively clearing areas of taller/rank vegetation. Access tracks can be maintained as a short sward, if required. Encroachment of scrub and bracken should be monitored and cleared as required.

- Foundry area (upper level): Areas of grassland and ephemeral/short perennial vegetation should be maintained, with strips of taller vegetation left along the edges of woodland wherever possible. Taller/rank vegetation and encroaching scrub should be cleared as required.

- Car park: While largely unsuitable for GCN, boundary landscaping will provide commuting and limited foraging habitat for GCN if maintained at a moderate sward height.

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- Fossil Forest: A mixture of rough grassland and ephemeral/short perennial vegetation should be maintained, with taller/rank vegetation and encroaching scrub cleared as required.

7.3.6 The lower levels of the Foundry area will remain largely unsuitable for GCN, and no specific habitat management is recommended for them.

7.4 *Refugia*

7.4.1 The creation of refugia across the site will provide places for shelter and hibernation for GCN, as well as being beneficial for a range of other species.

7.4.2 Simple piles of brash or rubble can be created during the course of other activities on the site. These should be placed in or immediately adjacent to suitable terrestrial GCN habitat, and ideally in positions where they are unlikely to be disturbed. Note that once in place, any such material piles created within the GCN exclusion fencing must be considered as refugia and appropriate RAMs must be followed (see Section 6.4).

7.4.3 It is also recommended that several artificial hibernacula are created, to provide higher quality places of shelter. These should be constructed in accordance with the GCN mitigation guidelines (English Nature, 2001), consisting of a core (clean rubble, logs or similar material) and a topsoil cap. The minimum dimensions for an artificial hibernaculum are two metres long by one metre wide, and one metre high (see Figure 7.4).

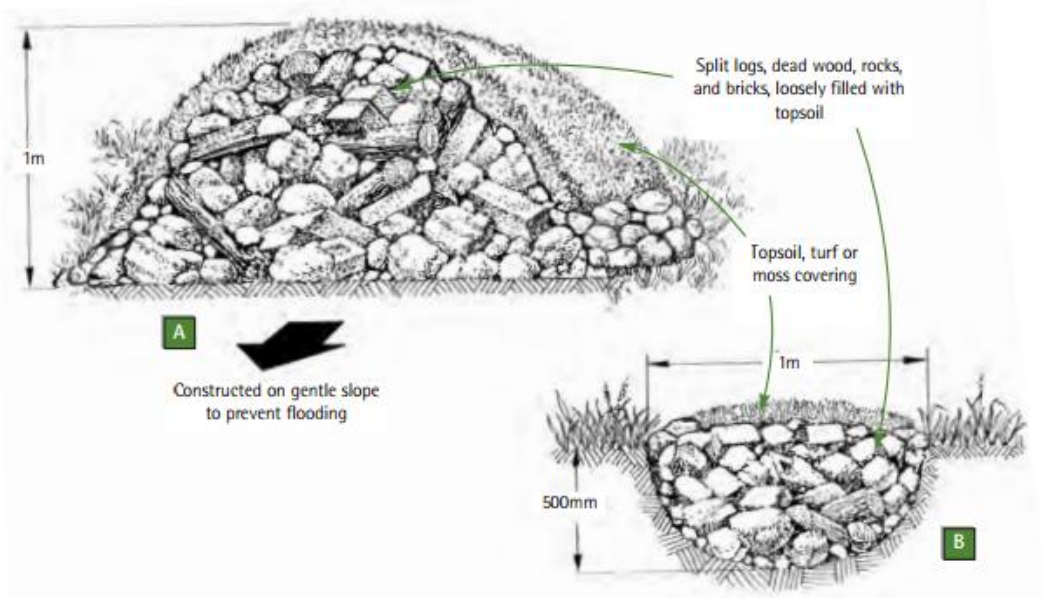


FIGURE 7.4. ARTIFICIAL HIBERNACULUM DESIGN
IMAGE ©LANGTON ET AL., 2001

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7.4.4 The following locations are recommended for the positions of artificial hibernacula; these represent a minimum number, and more could be created close to these locations:

- Conservation area: One hibernaculum close to, and south of, Ponds 2 and 3. At least two hibernaculum north/north-east of the drainage pits (see Figures 7.1 and 7.2 for pond/drainage pit locations).

- Wonderbank: Two hibernacula at the edge of the central area/solar farm (one north and one south), either at the edge of the clearing or inside the marginal scrub. One or two additional hibernacula could be created in woodland in the north-east of the Wonderbank, close to the boundary with the conservation area.

7.4.5 Additional hibernacula could also be created along the north-western edge of the community orchard and the south-western edge of the Fossil Forest. While GCN are not currently considered to be present in these areas, they would be able to access them in the longer term if the GCN exclusion fencing is removed. They would also be immediately beneficial for the common lizard population known to be present in the Fossil Forest.

7.4.6 The locations of refugia and hibernacula should be varied where possible, with some located on damp soils to prevent them drying out, and others in sunlit scrub edges. They should not be located within open rides or glades.

7.5 *Monitoring*

7.5.1 Annual monitoring surveys will continue to be carried out, with three torch surveys per pond (existing ponds 1 to 3, plus new ponds once created) be take place per year between April to early June, with a minimum of one survey between mid-April to mid-May. All records will be submitted to Cofnod, the Local Environmental Records Centre for North Wales, as part of the GCN Monitoring project.

7.5.2 Torch surveys may need to be supplemented with other survey techniques (netting, egg searches) if evidence of GCN presence/breeding cannot be confirmed.

7.5.3 Habitat Suitability Index (HSI) assessments will be carried out annually on each pond as part of the monitoring; the results of these will be used to recommend management actions for the year.

7.5.4 Monitoring will be carried out by an appropriately licensed ecologist. The long-term plan is for Brymbo Heritage Trust staff and volunteers to receive sufficient training to be able to carry out the monitoring and recording under the supervision of GCN licence holder(s) within the Trust.

7.5.5 Key Performance Indicators (KPIs) will be used to monitor the success of GCN conservation measures within Brymbo Heritage Area; these are in addition to any monitoring or reporting

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required as part of EPS licence conditions. Conservation measures will be considered successful when the following conditions are met:

- Minimum count of 20 GCN *or* evidence of breeding (eggs, efts) in each pond.
- Minimum total count of 50 GCN for the site.

7.5.6 Additionally, immediate review of the conservation measures will be triggered if:

- No GCN (or evidence of breeding) are recorded in a pond on two of three of the surveys in any given year.
- No standing water is present in a pond on two of three of the surveys in any given year.

7.5.7 An Ecological Compliance Audit is recommended in order to monitor conservation activities on the site, and will be required for any activities carried out under an EPS licence. An external auditor should be appointed by Brymbo Heritage Trust to carry out this function. An example of an Ecological Compliance Audit reporting form has been included as a separate document (Appendix B).

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8.0 Timing, Phasing and Duration of Construction and Conservation Measures

8.1 Table 8.1 details important dates with respect to GCN ecology and conservation works.

TABLE 8.1. TIMETABLE OF WORKS

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Hibernation												
Active												
- in ponds												
- in terrestrial habitat												
Pond maintenance												
Strimming/mowing												
Disturbance of habitat piles												
Destructive groundworks												
Excavations for GCN fence repairs (if required)												

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9.0 Legislation

9.1 *Great Crested Newts*

GCN are protected under the Conservation of Habitats and Species Regulations 2017, known as the 'Habitats Regulations', because they have declined throughout Europe in recent decades.

Under the Habitats Regulations, it is an offence to:

- Deliberately capture, injure or kill any wild animal of an EPS;
- Deliberately disturb wild animals of any such species;
- Deliberately take or destroy the eggs of such an animal; or
- Damage or destroy a breeding site or resting place of such an animal.

Disturbance includes, but is not limited to, any disturbance which is likely:

- To impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or (in the case of animals of a hibernating or migratory species) to hibernate or migrate; or
- To affect significantly the local distribution or abundance of the species to which they belong.

Under the Wildlife and Countryside Act 1981(as amended) it is illegal to:

- Intentionally or recklessly disturb any great crested newt while it is occupying a structure or place which it uses for shelter or protection, 9(4)(b).
- Intentionally or recklessly obstructs access to any structure or place used by a great crested newt for shelter or protection, 9(4)(c).
- Sell, offer or expose for sale any great crested newt, 9(5).

It is, however, legal for you to tend a disabled GCN with the intention of releasing it, or to kill a GCN that cannot recover, as long as the injury was not a result of your unlawful act (Habitat Regulations 44(2); W&CA 10(3)(a)(b)).

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10.0 References

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APPENDIX A – Biosecurity Risk Assessment

Biosecurity risk assessment and operational procedures.

Species	Potential contamination route	Likelihood of risk	Operational Procedure	Controlled waste
Chytrid fungus (impacting amphibian species)	Transport of spores on boots or equipment from one waterbody to another, or between amphibian populations.	Conservation area and Wonderbank: High. Ponds in the conservation area are known GCN breeding sites. Rest of site: Low. Standing water elsewhere on site is unlikely to be suitable for amphibians.	Ensure all staff, volunteers, contractors and ecologists clean their footwear and equipment before entering and leaving the conservation area and/or Wonderbank. Access to the ponds should be minimised where possible. If amphibians are handled, disposable vinyl gloves must be worn.	n/a
New Zealand pigmyweed *(Crassula helmsii)*	Spread of species on footwear or machinery.	Low. *Crassula* is known to be present in North Wales but not found on site.	Ensure all staff, volunteers, contractors and ecologists clean their footwear between sites. Ensure contractors know what it looks like and all machinery is cleaned prior to arriving on site. If it is found on site it must be treated using glyphosate.	Yes – any plant material
Other non-native aquatic plant species including: Water fern, parrot's feather, floating pennywort, waterweed, least duckweed	Spread of species on footwear or machinery.	Low. Known to be present in North Wales but not found on site.	Ensure all staff, volunteers, contractors and ecologists clean their footwear between sites. If any plants are identified on site, seek advice on control and removal.	No
	Introduction via natural dispersal.	Low. Known to be present in North Wales but not found on site.		

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Japanese knotweed	Spread of species via construction machinery/ movement of soil.	Wonderbank: High. Known to be present within the Wonderbank area. Rest of site: Low. Not observed elsewhere on site and no need to move soil between areas.	Ensure contractors know what Japanese knotweed looks like. If new stands are identified on site, immediately stop works in the vicinity and seek advice on control and removal from a professional, specialist contractor. Japanese knotweed must not be mechanically cleared, cut or otherwise removed except under expert guidance. Any plant material must be burnt on site or removed; removed material (including contaminated soil) should be treated as controlled waste and sent to licenced landfill. If it is identified on site, refer to the Environment Agency's Japanese knotweed Code of Practice.	Yes – any plant material or soil
	Introduction of seeds via contaminated soil.	Low providing any soil brought onto site is from a reputable supplier.		
	Introduction via natural dispersal.	Wonderbank: High. The species is known to be on site and may spread. Rest of site: Low. Limited dispersal routes from known populations in the Wonderbank.		
Cotoneaster	Species spread by machinery and movement of soil/plant material.	Moderate. Small numbers of *Cotoneaster* are known to be present in the east of the site.	Ensure contractors, staff and volunteers know what *Cotoneaster* looks like. Young seedlings pulled will be pulled by hand and the root mass excavated Plants to be removed when not in fruit (not in July – October) Any material from the cotoneaster or containing cotoneaster waste must be chipped/burnt on site, or removed to licensed landfill as controlled waste.	Yes – any plant material or soil
	Introduction/spreading via natural dispersal of seeds.	Moderate. Small numbers of *Cotoneaster* are known to be present in the east of the site.		
Buddleja	Spread of species via construction machinery/ movement of soil.	Moderate. *Buddleja* are known to be present in the east of the site.	Ensure contractors, staff and volunteers know what *Buddleja* looks like.	No

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	Introduction/spreading via natural dispersal of seeds.	Foundry area/car park/Fossil Forest: High. Numerous *Buddleja* are present in the east of the site and suitable habitats for rapid colonisation. Rest of site: Low. Limited dispersal routes from known populations in the east of the site and limited habitats for opportunistic colonisation.	The plants should be cut back to the stump and the cuttings should be disposed of by burning. Stumps should be either dug up and disposed of, or injected with herbicide immediately after being cut. Young plants should be pulled by hand.	
Himalayan balsam	Spread of species via construction machinery/movement of soil.	Low. Himalayan balsam is not known to be present on site.	Ensure contractors know what Himalayan balsam looks like. If any plants are identified on site these should be pulled up and left to dry before the seeds set (July/ August).	Yes – any plant material or soil
	Introduction of seeds via contaminated soil.	Low. No known requirement for soil to be brought onto site for landscaping and planting.		
	Introduction via natural dispersal.	Low. Himalayan balsam is present in the region and able to rapidly spread through seed dispersal, but has not been recorded near to the site.		
Other INNS plants	Landscaping and planting	Low.	All new planting stock be to grown in an environment free from INNS plants. Non-native ornamental plants with tendencies to spread in the wild must be avoided as planting stock (e.g. cotoneasters, *Buddleja davadii*).	n/a

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APPENDIX B – Example Ecological Compliance Audit reporting form

Included as a separate document

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