Mr Derek Davies

Land Adjacent to 33 Abenbury Way,

Wrexham Industrial Estate

SY14 7LH

Great Crested Newt
Reasonable Avoidance Measures - Method Statement

17.09.2025

Produced by Wildbanks Conservation

www.wildbanksconservation.com

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Final	06/09/25	Jack Halpin, Wildbanks Conservation	06/09/25	Mick Smith, BSc, Director Wildbanks Conservation

The information we have prepared is true to the best of our knowledge and we confirm that the opinions expressed are our true and professional bona fide opinions.

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1.0 INTRODUCTION

1.1 Wildbanks Conservation were commissioned to prepare a Reasonable Avoidance Method Statement (RAMS) for Great Crested Newts (*Triturus cristatus*) in relation to the proposed development of a detached steel industrial unit with associated parking on land adjacent to 33 Abenbury Way, Wrexham Industrial Estate, SY14 7LH (hereafter referred to as Site).

1.2 An Ecological Assessment, undertaken by Wildbanks Conservation in December 2022 to support a planning application to develop the Site, recommended that the proposed works could be undertaken under Reasonable Avoidance Measures to minimise potential disturbance, injury or death to Great Crested Newts (GCN). Condition 5 of planning permission P/2022/0411 requires this RAMS to be produced and submitted and approved in writing by the Local Authority prior to the commencement of the development. These RAMs will fulfil this planning condition.

1.3 Development proposals for the Site are for the building of a detached steel industrial unit and associated parking. The current site is entirely comprised of amenity grassland.

1.4 The formulation of a RAMS has been conducted and prepared by a qualified Natural Resources Wales (NRW) licensed ecologist, Jack Halpin ACIEEM (NRW EPS licence: S092509/1). This report gives details of the reasonable avoidance measures considered necessary in order to comply with relevant legislation and conservation objectives and to ensure no GCN are harmed during the works and habitats are protected. For comprehensive background and methodology, the full Preliminary Ecological Appraisal (PEA (Ecological Appraisal 2022) relating to the development should be referred to; this report only provides a summary of that information.

1.5 Great Crested Newts are protected under Schedule 5 of the Wildlife and Countryside Act (1981) as amended and the Conservation of Habitats and Species Regulations 2010 (as amended). Because of their rarity they are also protected under Annexes IIa and IVa of the Habitats and Species Directive and under the Berne Convention.

Langton *et alia* (2001) make the point that:
"The wording in the 1981 Act and 1994 Regulations is slightly different." "Taken together, the Act and the Regulations (following the CROW Act 2000) make it illegal to:

- *Intentionally or deliberately capture or kill, or intentionally injure great crested newts.*

- *Deliberately disturb great crested newts or intentionally or recklessly* disturb them in a place used for shelter or protection.*
- *Damage or destroy a breeding site or resting place.*
- *Intentionally or recklessly damage, destroy or obstruct access to a place used for shelter or protection.*
- *Possess a great crested newt, or any part of it, unless acquired lawfully.*
- *Sell, barter, exchange or transport or offer for sale great crested newts or parts of them.*

*Reckless offences were added by the Countryside and Rights of Way Act 2000, which applies only to England and Wales".

2.0 **RATIONALE**

2.1 This section summarises the current status of GCN in and around the proposed application site and outlines the basis for the recommendations provided. A site walkover was undertaken on 06/08/2025. Multiple annual visits have been carried out as part of the ongoing management and monitoring of the ecological mitigation area established under a previous planning application immediately adjacent to the Site.

2.2 Background Information

2.2.1 Great crested newts are known to be present within the wider Wrexham Industrial Estate. The development of the unit occupied by Alpha Windows - plot immediately to the West of the Site (Figure 2) was conducted under GCN RAMS in 2016 – multiple ponds within the industrial estate are known to contain breeding GCN. Within a 500m radius of the development site eleven ponds exist with the nearest pond located 80m north of the Site. All of which are thought, or likely to support small populations of GCN.

2.2.2 The eleven ponds within 500m of the Site were not surveyed to inform the Preliminary Ecological Appraisal undertaken in December 2021. It is known and accepted that GCN are present within the landscape surrounding the Site.

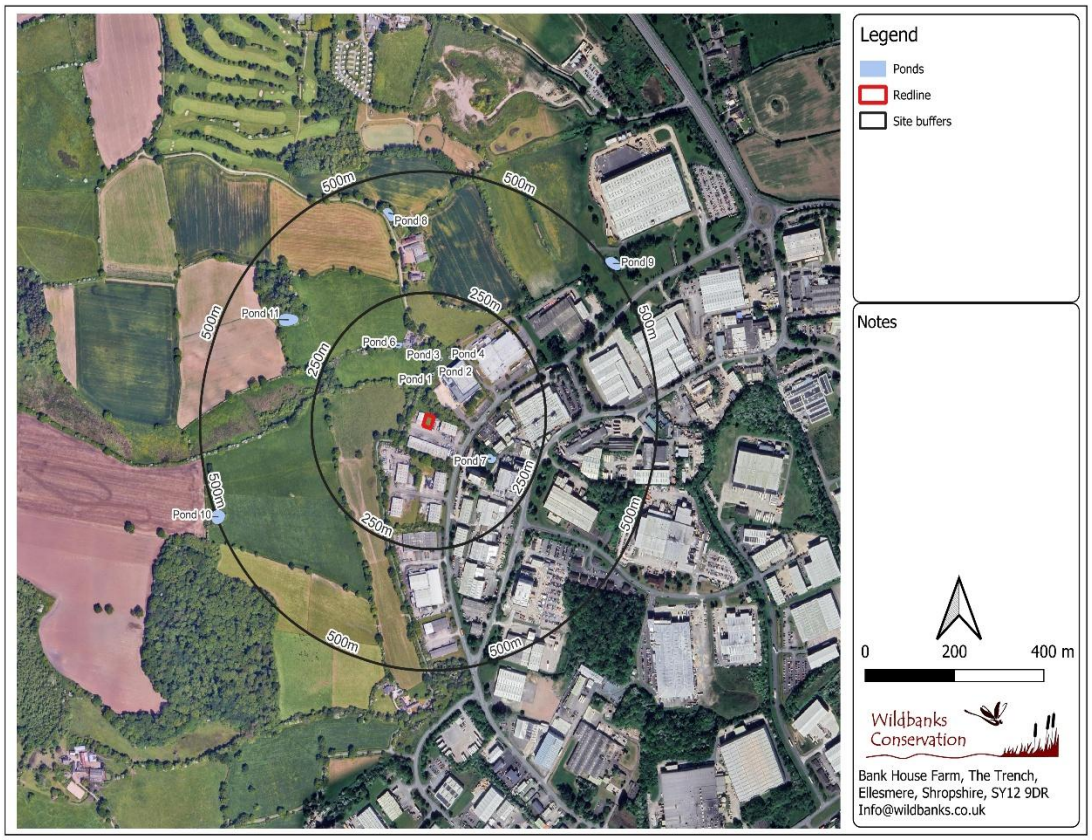


Figure 1: Wider landscape showing development outlined in red and ponds marked blue (Base image © Google Maps 2025).

2.3.1 Terrestrial Habitat

2.3.2 Terrestrial habitats within the Site consist of low mown grass and were considered low-quality foraging habitat for GCN due to its low sward height, low species diversity and lack of tussocks. The vegetation is approximately 50mm in height within the Site. In addition, there are no features within the Site that offer hibernation or significant resting potential.

2.3.3 To the south of the Site is carparks and roads and adjacent industrial units providing no foraging habitat for GCN, Figure 2.

2.4.1 Aquatic Habitat

2.4.2 No ponds are present within the Site itself; however, eleven ponds have been identified within 500 m (Figure 1), seven of which lie within 250 m. Ponds 1–6 are surrounded by good foraging habitat, with no significant barriers to GCN movement. Pond 7, while not directly surrounded by good foraging habitat, remains well connected to the Site. Overall, connectivity between ponds 1–7 and the Site is good, and includes area of rough grassland, hedgerows, and associated wet ditches that provide excellent foraging and commuting opportunities.

2.5.1 Habitat usage and dispersal on land

2.5.2 It is known that GCN are present within the wider Wrexham Industrial Estate and that they breed within many ponds within the surrounding area. It is acknowledged that GCN could breed within Ponds 1-11. Habitat within the Site is of low foraging value to GCN and no hibernating/refuge opportunities exist. Commuting GCN may be present in peak migrating periods and as such, without mitigation there is a chance that GCN could be harmed or killed during the development.

2.5.3 No works (prior to or proposed) will impact on any ponds or marginal habitats. The works to develop the Site will take place more than 75m away from the closest pond (Pond 1 – see Figure 2)

2.5.4 The Precautionary Method Statement below provides a number of measures that will have to be followed in order to minimise the impact on Great Crested Newts.

2.5.5 Provided that works within the development area adheres to the RAMS, it is considered a European Protected Species (EPS) Development Licence from NRW will not be required.

3 PRECAUTIONARY METHOD STATEMENT

3.1 The objectives of this method statement are to:

- Avoid committing an offence under the above-mentioned legislation; and,
- To ensure that favourable conservation status of GCN is maintained.

3.2 Any development related activities on the site, such as vegetation clearance or excavations in areas of suitable newt habitat may potentially affect this species. As a result, safeguards must be implemented to protect this species and the Method Statement below details measures to be implemented to ensure an offence is not committed.

3.3 In cases where an EPS development licence is considered not required, it is essential that reasonable precautions be taken to avoid affecting European Protected Species during works. The following activities should therefore be undertaken, and the contents of this document made available to contractors carrying out the works.

3.4 The Site is a grassland with a short sward, in summary the aim of these RAMS is to maintain the short sward across the entire Site plus a 3m buffer that is unattractive to GCN. Any areas of longer vegetation that will be disturbed during the works, these will be cleared using a 2-cut method, hand searched and overseen by a suitably qualified ecologist.

3.5 In addition to the above, the proposed development site will be fenced by one-way temporary amphibian exclusion fencing (TAF). Installed under the supervision of a NRW GCN licensed ecologist. The fence will be installed at least 15 days prior to works taking place. The proposed arrangement of the amphibian exclusion fencing is shown in Fig. 2 and consists of fencing installed on the Northern boundary, with two "kickbacks" of 5m down the Eastern and Western side of the development. These kickbacks will be upright TAF. This fencing will span between the two developments either side of the proposed development. The TAF is not proposed to encircle the development, as it is considered very unlikely GCN would traverse across the tarmac car parks and roads to the south of the Site to access the Site. Commuting routes exist along the hedge to the west should they be foraging or migrating near to the Site.



Figure 2: Aerial view of development site with exclusion fencing and Pond 1 indicated © Google Maps 2025).

3.6 The TAF will be maintained throughout the construction period, in order to ensure, no Great Crested Newts are able to enter the site. The TAF will be removed on completion of the construction period.

3.7 <u>What Needs to Be Done</u>

3.7.1 A NRW licensed ecologist will be retained for the duration of the development. This ecologist will be on hand throughout and be present at the appropriate times to oversee works as required.

Toolbox talk

3.7.2 All site operatives will receive a briefing by a NRW licensed ecologist. The briefing would include details of the legal protection of Great Crested Newts, the precautionary methods of working (outlined in this document), tips on identification of Great Crested Newts and procedures to follow should the species be discovered during works. The briefing will form part of the site induction process for each site operative. A GCN factsheet will also be pinned to the site information board in the site office and a copy of the RAMS provided to contractors and to be retained on site at all times.

One-Way Temporary Amphibian Fencing

3.7.3 No construction or preparatory works as part of the development until the one-way TAF has been installed on site for at least a period of 15 days.

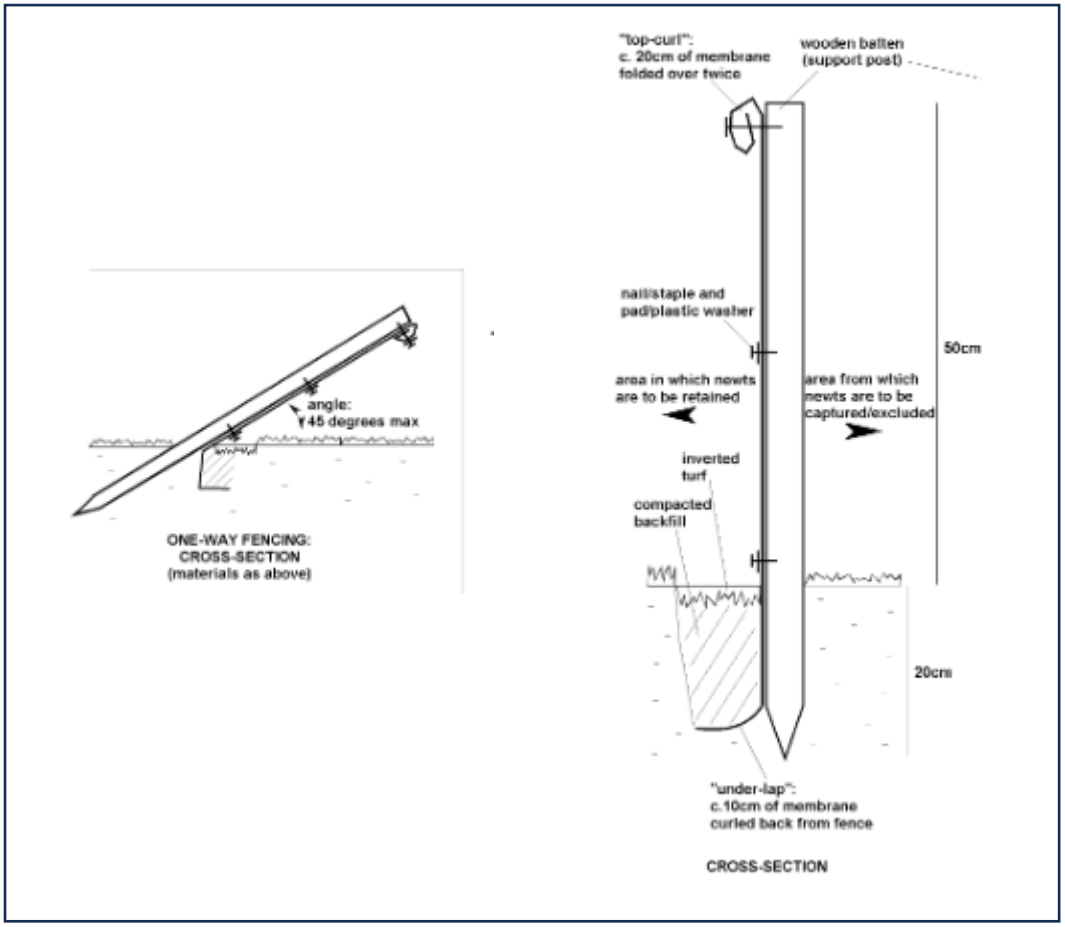


Figure 3. Recommended design and construction for exclusion fencing for upright and one-way fencing. Figure from English Nature 2001.

Vegetation clearance

3.7.4 Ecologist to carry out Site walkover 1 month prior to works commencing to ensure the status of the Site has not changed and that the RAMS produced are still appropriate.

3.7.5 The Site and a 3m buffer surrounding the Site is currently short grass, less than 50mm in height. This grassland will remain below 50mm until and throughout the development. This may require additional cuts prior to works commencing.

3.7.6 Areas of long grass or ungrazed field margins affected by the works, are to be hand searched by licensed ecologist or accredited agent following standard two stage cutting protocols. Vegetation will be cut to 150mm and will be hand searched. The vegetation will then be cut to 50mm and then hand searched again. The final cut will be down to

bare ground. Once the area is bare ground and has been finger tipped searched works can commence without an ecologist being present if deemed appropriate by the ecologist

3.7.7 Any amphibian individuals found will be caught and transferred to a designated area that is away from the development works, such as receptor site (see Fig. 2).

Working methods

3.7.8 Only light machinery or hand tools to be used for the vegetation clearance.

3.7.9 Where possible any excavations will be filled over night and if not possible the trench will be checked prior to backfilling to ensure no animals have fallen in the trench. A 'ladder' will be added to all trenches over night to allow small mammals and amphibians to escape. The 'Ladder' to be a piece of 150mm x 25mm rough sawn timber placed within the trench and extending beyond the ground level at a slope of no more than 35°

Storage of materials and vehicle movements

3.7.10 All material storage will be raised off the ground by 100mm so as not to create new resting places for newts (e.g. on pallets).

Procedure if Great Crested Newts are found

3.7.11 If a Great Crested Newt is found at any time during construction, **all works would cease immediately**. Wildbanks Conservation will be contacted, and a suitable strategy will be proposed that may include the application for a European Protected Species License.

Wildbanks Conservation
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4.0 REFERENCES

- Wildbanks Conservation, (2022). Ecological Appraisal and Precautionary Method Statement with regards to GCN.

- Langton, T.E.S., Beckett, C.L., and Foster, J.P. (2001), Great Crested Newt Conservation Handbook. Froglife, Halesworth.

- English Nature (2001). Great Crested Newt Mitigation Guidelines. English Nature, Peterborough

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A1 APPENDIX - SITE PHOTOGRAPHS



Plate 1: View north across the Site



Plate 2: View south across the Site



Plate 3: Receptor Site facing west