QUEENSBRIDGE FARM, WREXHAM

HABITATS REGULATIONS

PRELIMINARY SCREENING ASSESSMENT AND APPROPRIATE ASSESSMENT

May 2025

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Report Control Sheet

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1 INTRODUCTION

1.1. SCOPE & PURPOSE

1.1.1. Collington Winter Environmental Ltd was commissioned by Steven Heighway to undertake a Habitats Regulations Assessment (HRA) Preliminary Screening Assessment and Appropriate Assessment for the development at Woodland to the South of Queensbridge Farm, Grange Road, Overton on Dee, Wrexham, LL13 0LE. This report has been prepared to support a planning application at the site for a change of use of woodland to a glamping site to include glamping pods.

1.1.2. The author of this report is Caitlin O'Connor, Senior Ecologist at Collington Winter Environmental Ltd. This project is overseen by Olivia Collington BSc (Hons), MIEnvSc, CEnv Director at Collington Winter Environmental Ltd. Olivia is highly experienced managing schemes and has produced many ecological reports to inform planning management plans.

1.1.3. Please see Figure 1.1.1 for the site location. The site is located in Overton on Dee, a village and community in Wrexham County Borough, Wales. A former borough and market town, it is situated close to the Welsh-English border on the edge of an escarpment that winds its way around the course of the River Dee.



Figure 1.1.1 Site Location

1.2. PROPOSED DEVELOPMENT

1.2.1. Steven Heighway is seeking planning permission at the site for the proposed erection of 7no. glamping pods within existing woodland on site.

1.3. SCOPE

1.3.1. This report has been produced to document the methods, ecological baseline, potential risks, and threats to designated sites and conclusions as part of the HRA process in respect of the proposed development.

1.3.2. The advice herein is based on desk and field-based studies and intends to fulfil the following purposes:

- Outline the methods used within this screening process and the scope of the assessment.
- Describe the ecological baseline, this includes sites in the National Site Network within the UK in the area with summary of the designation and pressures/ threats. The baseline also includes results of recent ecological surveys carried out on the site.

- Assesses the likely pathways and effects on the sites.
- Provide a summary of the sites, impacts and pathways.
- Present mitigation methods for likely effects on site (if required).

2 LEGISLATION

2.1. THE CONSERVATION OF HABITATS AND SPECIES (EU EXIT) REGULATIONS 2017 (AMENDMENT 2019)

2.1.1. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 has been applied to the UK law, following the implementation of Brexit on 31 December 2020 (referred to as the 'exit day') under the European Union Withdrawal Act 2018. Prior to the exit day, in accordance with Article 6(3) of the Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora ('Habitats Directive') 'Article 6 Assessments' were required where a plan (or project), not directly connected with or necessary to the management of a Natura 2000 site(s), may give rise to significant effects upon a Natura 2000 site(s). Although the Habitats Directive is no longer applicable to UK law, the requirement for Article 6 Assessments has been transposed into UK law under Part 6 of the Conservation of Habitats and Species Regulations 2017 and is commonly referred to as a 'Habitats Regulations Assessment'.

2.1.2. For the purposes of the UK Regulations, and any guidance issued before "exit day" by the appropriate authority or the appropriate nature conservation body, relating to the application of these Regulations, on or after "exit day", references to "Natura 2000" (other than in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019) are to be construed as references to the National Site Network (NSN), as detailed in Section 4 of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. This consists of:

- European sites in the UK
- European marine sites in the UK
- European offshore sites in the UK

2.1.3. These are inclusive of those mentioned within the European Community (EC), until such a time that the changes to the procedures for designation/classification of protected sites within the network in Europe is implemented through UK state law. Such European sites in the UK includes Special Areas for Conservation (SAC), Special Protect Area (SPA), candidate SACs and proposed SPAs, with regulations introducing a review procedure for plans and projects likely to significantly affect a European site in the UK. In the UK, Ramsar sites should also undergo an assessment by a competent authority when a plan/project is considered likely to have a significant effect upon a site (Department for Environment, Food and Rural Affairs (DEFRA), 2006).

2.2. EUROPEAN SITES IN THE UK

2.2.1. SAC, SPA, candidate SACs and proposed SPAs are designated sites are defined in the under the Habitats and Species Regulations 2017 as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, where legal protection is retained under UK domestic legislation.

2.2.2. Ramsar sites are a wetland site designated of international importance under the Ramsar Convention, they are offered protection under the Wildlife and Countryside Act 1981 (as amended).

3 METHODOLOGY

3.1. IMPACT ASSESSMENT

3.1.1. The Zone of Influence (ZoI) of the proposed development is to be considered to identify potential direct and indirect impacts from the development to any 'ecological receptors' within the wider area.

3.1.2. All types of effects which are relevant to the proposed development, and which are likely to be significant in this case, are considered. Mitigation procedures and potential alternative plans will also be considered to avoid the potential impacts.

3.2. HABITAT REGULATION ASSESSMENT

3.2.1. The HRA process is separated in to four stages, set out in the European Commission guidance "Assessment of plans and projects significantly affecting Nature 2000 sites – Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC" (November 2001). Article 6(3) of the Habitats Directive relates to Stages 1 to 3 and Article 6(4) to Stage 4. This report challenges Stage 1. The stages are as follows:

3.2.2. Stage 1 – Screening

3.2.3. The approach to Stage One of the HRA Report, based off the information within the potential ZoI is summarised as follows:

- Identify European sites within the UK within the potential ZoI of the project.
- Identify the features of interest of the European sites within the UK and review their conservation objectives.
- Review whether there is potential for the features of interest to be affected by the project, based on information such as the vulnerabilities of the site(s), proximity to the Site and the nature and scale of the works associated with the project.
- Consider the likelihood of the identified potential impacts and effects occurring based on the information collected and professional judgement.
- Consider the likelihood of cumulative effects arising from the project in-combination with other plans and projects.
- Identify the likelihood of significant effects on European sites within the UK occurring because of the project.

3.2.4. Stage 2 – Appropriate Assessment

3.2.5. The consideration of the impact on the European sites, either independently or in combination with other developments or proposed, with respect to the site's citation and conservation targets. Mitigation for substantial impact may also be assessed.

3.2.6. Stage 3 – Assessment of Alternative Solutions

3.2.7. The examination of alternative procedures of achieving objectives of the proposed development that will avoid significant impacts on the Natura 2000 or Ramsar site.

3.2.8. Stage 4 – Compensatory Measures

3.2.9. An assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest, it is deemed that the plan should proceed.

Application to Stage One - Screening Report

3.2.10. The approach to Stage One of the HRA Report, based off the information within the potential ZoI is summarised as follows:

- Identify European sites within the UK within the potential ZoI of the project.
- Identify the features of interest of the European sites within the UK and review their conservation objectives.
- Review whether there is potential for the features of interest to be affected by the project, based on information such as the vulnerabilities of the site(s), proximity to the Site and the nature and scale of the works associated with the project.
- Consider the likelihood of the identified potential impacts and effects occurring based on the information collected and professional judgement.
- Consider the likelihood of cumulative effects arising from the project in-combination with other plans and projects.
- Identify the likelihood of significant effects on European sites within the UK occurring because of the project.

4 SITE DESIGNATIONS AND ALLOCATIONS

4.1. DATA SOURCES

4.1.1. The following documentation has been utilised in preparing the results section:

- SAC Citation Documents (Natural England);
- SAC Conservation Objectives Documents;
- Natural England, Site Improvement Plan – River Dee and Bala Lake
- Natural Resources Wales, Core Management Plan including Conservation Objectives - River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC
- Natural Resources Wales, Core Management Plan including Conservation Objectives – Johnstown Newt Sites SAC
- Natural England, Site Improvement Plan – West Midlands Mosses
- Information Sheet on Ramsar Wetlands (RIS) - Midland Meres and Mosses Phase 1
- Information Sheet on Ramsar Wetlands (RIS) - Midland Meres and Mosses Phase 2

4.2. EUROPEAN PROTECTED SITES WITHIN THE UK

4.2.1. Consultation with Magic.gov.uk identified the international and European designated sites within a 10 km radius (ZoI):

- River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid (Wales) Special Area of Conservation (SAC), River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid (England) SAC, and River Dee and Bala Lake SAC are located approximately 1.4 km northwest from the site boundary.
- Midland Meres & Mosses – Phase 2 (Ramsar) is located approximately 7.6 km southeast from the site boundary.
- West Midlands Mosses SAC is located approximately 7.9 km southeast from the site boundary.
- Midland Meres & Mosses – Phase 1 (Ramsar) is located approximately 8 km southeast from the site boundary.
- Johnstown Newt Sites are located approximately 8.3 km northwest from the site boundary.

4.2.2. Refer to Appendix 1 for the locations of the European designated sites in relation to the development site.

4.2.3. No other European Sites were located within 10 km of the site boundary. Further European sites are located further than 10 km from the site. It is considered that the result of the proposed development will have no direct significant adverse impacts on these European sites within the UK.

4.3. RIVER DEE AND BALA LAKE/ AFON DYFRDWY A LLYN TEGID SAC

Qualifying Features

4.3.1. The River Dee has its source in Snowdonia at the outflow of Llyn Tegid and it includes the Ceiriog, Meloch, Tryweryn and Mynach tributaries. Its catchment contains a wide spectrum of landscape from high mountains around Bala, rugged peaks near Llangollen, steep sided wooded valleys, and the plains of Cheshire, Flintshire, north Shropshire and Wrexham. There is a tidal influence as far upstream as Farndon and high tides regularly exceed the Chester weir crest level.

4.3.2. The site is primarily designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation

4.3.3. The following Annex 2 species are a primary reason for selection of this site:

- Atlantic salmon (*Salmo salar)*
- Floating water-plantain (*Luronium natans)*

4.3.4. The following Annex 2 species are present as a qualifying feature, but not a primary reason for selection of this site:

- Sea lamprey *(Petromyzon marinus)*
- Brook lamprey *(Lampetra planeri)*
- River lamprey *(Lampetra fluviatilis)*
- Bullhead *(Cottus gobio)*
- Otter (*Lutra lutra)*

Conservation Objectives

4.3.5. Natural Resources Wales detail that each conservation objective is a composite statement defining a site-specific aspiration for each designated feature. This composite statement contains clauses that correspond to all the elements of FCS, namely:

For habitat features:

- Extent should be stable in the long term, or where appropriate increasing*;
- Quality (including in terms of ecological structure and function) should be being maintained, or where appropriate improving;
- Populations of the habitat's typical species must be being maintained or where appropriate increasing;
- Factors affecting the extent and quality of the habitat and its typical species (and thus affecting the habitat's future prospects) should be under appropriate control.

For species features:

- The size of the population should be stable or increasing, allowing for natural variability, and sustainable in the long term;
- The distribution of the population should be being maintained;
- There should be sufficient habitat, of sufficient quality, to support the population in the long term;
- Factors affecting the population or its habitat should be under appropriate control.

4.3.6. The Core Management Plan including Conservation Objectives - River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC produced by Natural Resources Wales include detailed conservation objectives for each qualifying feature (Page 22 – 29).

Pressures and Threats

4.3.7. The main current threats and pressures to the site include:

- Scrub control
- Recreational activities
- Non-native invasive species
- Water pollution
- Road Traffic Accidents (RTA) involving otters
- Urban infrastructure preventing the upstream migration of fish species

4.4. MIDLAND MERES & MOSSES – PHASES 1 & 2 RAMSAR

Qualifying Features

4.4.1. The Meres & Mosses form a geographically discrete series of lowland open water and peatland sites in the north-west Midlands of England. These have developed in natural depressions in the glacial drift left by receding ice sheets which formerly covered the Cheshire/Shropshire Plain. The 16 component sites (Phase 1) and 18 component sites (Phase 2) include open water bodies (meres), the majority of which are nutrient-rich with associated fringing habitats; reed swamps, fen, carr & damp pasture. Peat accumulation has resulted in nutrient poor peat bogs (mosses) forming in some sites in the fringes of meres or completely infilling basins.

In a few cases the result is a floating quaking bog or schwingmoor. The wide range of resulting habitats support nationally important flora & fauna.

4.4.2. The site supports a number of rare species of plants associated with wetlands, including the nationally scarce cowbane (*Cicuta virosa)* and, elongated sedge (*Carex elongata)*. Also present are the nationally scarce bryophytes (*Dicranum affine)* and (*Sphagnum pulchrum).*

4.4.3. Also supports an assemblage of invertebrates including several rare species. There are 16 species of British Red Data Book insect listed for this site including the following endangered species: the moth (*Glyphipteryx lathamella),* the caddisfly (*Hagenella clathrate)* and the sawfly (*Trichiosoma vitellinae)*.

Pressures and Threats

4.4.4. The main current threats and pressures to the site include:

- Eutrophication
- Introduction/invasion of non-native plant species

4.4.5. Both threats are still operating, but it is unclear if they are under control, as there is a lag in showing the management or regulatory regime to be successful

4.5. WEST MIDLAND MOSSES SAC

Qualifying Features

4.5.1. The West Midlands Mosses comprises four sites: Clarepool Moss, Abbots Moss, Chartley Moss and Wybunbury Moss. These support large basin mires which have developed as quaking bogs, known as Schwingmoors, together with a variety of associated hollows and pools showing various types and stages of mire development. This complexity of habitats gives rise to a diverse assemblage of associated plants and invertebrates of national significance.

4.5.2. The site is primarily designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- **Natural dystrophic lakes and ponds** - West Midlands Mosses contains three pools, one at Clarepool Moss and two at Abbots Moss, that are examples of dystrophic lakes and ponds in the lowlands of England and Wales, where this habitat type is rare. The lake at Clarepool Moss is unusual as a dystrophic type on account of its relatively base-rich character, which is reflected in the presence of a diverse fauna and flora. The two at Abbots Moss are more typical, base-poor examples. The dystrophic lakes and ponds at this site are associated with Schwingmoor development, a characteristic of this habitat type in the West Midlands. Schwingmoor is an advancing floating raft of bog-moss (*Sphagnum spp.)*, often containing NVC type M3 *Eriophorum angustifolium* bog pool community, which grows from the edge of the pool and can completely cover over the pool; the site has also been selected for this Annex I feature (7140 Transition mires and quaking bogs).
- **Transition mires and quaking bogs** - West Midlands Mosses represents Schwingmoor vegetation. Floating rafts of *Sphagnum*-dominated vegetation have developed over semi-liquid substrates within basins. In the UK this type of *Sphagnum*-dominated vegetation with a scatter of sedges (*Carex spp.)* species and cranberry (*Vaccinium oxycoccos)* is confined to this part of England and mid-Wales.

Conservation Objectives

4.5.3. Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Site Improvement Plan by maintaining or restoring:

- The extent and distribution of qualifying natural habitats and habitats of qualifying species,
- The structure and function (including typical species) of qualifying natural habitats,
- The structure and function of the habitats of qualifying species,
- The supporting processes on which qualifying natural habitats and the habitats of qualifying

species rely,

- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Pressures and Threats

4.5.4. The main current threats and pressures to the site include:

- **Water Pollution:** On each of the component sites (i.e. Clarepool Moss, Wybunbury Moss, Abbots Moss, and Chartley Moss) the features have been historically impacted by, and remain vulnerable to, changes in water quality and nutrient enrichment from their surrounding catchment. Dystrophic pools at Abbots Moss currently fail to meet their water quality objectives whilst those at Clarepool Moss require testing. The evidence suggests that activities within the small catchments (agriculture, forest nursery, residential etc) are the sources of excess nutrients.
- **Hydrological changes:** All of the component areas of transition mire are impacted by historic drainage. At Clarepool, Chartley and Wybunbury Mosses some of this damage has been partially repaired but further measures to restore a naturalised hydrology are needed in all locations. As well as surface water, ground water is also an important water supply mechanism to the mosses. Hence the SAC is vulnerable to groundwater abstractions and artificial flooding as well as catchment drainage.
- **Air pollution (impact of atmospheric nitrogen deposition):** Nitrogen deposition exceeds site relevant critical loads.
- **Inappropriate scrub control:** The transition mire habitat at each of the component sites experiences continual re-colonisation by scrub, typically birch and pine as a consequence of past hydrological change e.g. historical drainage and cumulative nutrient enrichment together with readily available seed sources. The presence of excessive amounts of scrub and trees affects the mire habitat by increasing the rate of drying out and by the addition of nutrients.
- **Game management: pheasant rearing:** Nutrient enrichment in the areas of pheasant pens and disturbance to ground flora from game birds are a local issue at Clarepool and Chartley Mosses. Erosion may be caused by shoot activities and access restrictions due to shooting can restrict rewetting and conservation management activities.
- **Forestry and woodland management:** Inappropriate woodland management, for example the restocking of land in close proximity to Abbots Moss could cause shade, nutrient enrichment and enhanced evapotranspiration and serve as an undesirable seed source for scrub (e.g. Pine) encroachment.
- **Habitat fragmentation:** The sites are small and geographically isolated from each other. The threat of localised species extinction is greater and so the chances of recolonisation by lost species is very low. An example of this is provided by the extinction from Abbots Moss and Wybunbury Moss in recent decades of the white-faced darter dragonfly, a species dependent on dystrophic pools. The nearest donor population is more than 20 miles away.

4.6. JOHNSTOWN NEWT SITES SAC

Qualifying Features

4.6.1. Johnstown Newt Sites SAC is a composite site and comprises one component SSSI, Stryd Las a'r Hafod SSSI. This site lies near to Wrexham in north-east Wales and is composed of two post-industrial sites where coal and clay have been extracted. The population of great crested newts (*Triturus cristatus)* is one of the largest known in Great Britain and has been the focus of much conservation management over the last few years. Breeding sites are provided in part by a mining subsidence pool, and natural water-filled hollows on clay, whilst other ponds have been created as part of nature conservation management. Terrestrial habitat varies from marshy grassland, grazed farmland and swamp through to scrub and broad-leaved woodland. Good populations of the widespread amphibian species are also present.

Conservation Objectives

4.6.2. The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- No less than 300 great crested newts will be present on the site
- At least 30 display/breeding ponds will be found throughout the entire site

- Great crested newt larvae will be found in 7 or more of the breeding ponds
- Half of the display/breeding ponds on the site will have a water depth of 10cm of more during the summer months.
- Native macrophytes will cover at least half of the pond surface yet some of the water surface will still remain open.
- Aquatic marginal vegetation will be present around the ponds
- Breeding/display ponds will not be heavily shaded by surrounding vegetation
- Algal blooms and surface sheens will be absent from display/breeding ponds
- Fish will not be present in breeding/display ponds which support great crested newts
- Only small numbers of water and wildfowl will be seen on the ponds
- The terrestrial habitat surrounding breeding ponds will comprise of refuge areas for newts, foraging areas, areas of hibernacula and corridors which will aid the dispersal of great crested newts
- Off site habitats that function as stepping stone or corridors located between SAC compartments will be maintained for migration, dispersal, foraging and genetic exchange purposes
- Off-site features that impact on successful dispersal, such as roadside gully-pots, will not be subject to future construction
- Non-native aquatic species will not be present
- Amphibian chytridiomycosis will not be present
- All factors affecting the achievement of the foregoing conditions are under control.

Pressures and Threats

4.6.3. The main current threats and pressures to the site include:

- Owner/occupier objectives – The site has 10 owners with varying interests in the site including quarrying, landfill, housing and development, conservation of protected species and habitats and recreation.
- Recreational use – The site is close to the communities of Johnstown and Rhosllanerchrugog and is used regularly for recreational purposes. Management unit 3, 7, 8 and 12 are within the country park. Teenagers are known to be moving fish between ponds, and some parts of the site are being used for off road motor sport.

4.7. ECOLOGICAL BACKGROUND OF DEVELOPMENT SITE

Habitats

4.4.1. A Preliminary Ecological Appraisal (PEA) of the site was completed at the site in January 2025 by Arbtech which found the site to comprise other neutral grassland; other mixed woodland; and native hedgerow.

4.4.2. An updated walkover of the site was conducted by Collington Winter Environmental in April 2025 which found the woodland to possess several ancient woodland indicator species including dog's mercury, lesser celandine, wood anemone, hearts tongue, and dog violet. The woodland on site was categorised as replanted ancient woodland.

Species

4.7.1. The PEA (Arbtech, 2025) notes that the site has suitability or potential suitability to support invertebrates associated with grassland, woodland, and hedgerows; foraging and community bats; breeding birds; herptiles; badgers; otters; water voles; and hazel dormouse. The updated walkover and consultation with Wrexham Council Ecologist Emma Broad concluded that hazel dormouse are not applicable to this development.

4.7.2. A Nighttime Bat Walkover (NBW) was completed at the site on 07/05/2025 which found the site to provide value for low numbers of common and widespread bat species including common pipistrelle (*Pipistrellus pipistrellus),* soprano pipistrelle (*Pipistrellus pygmaeus),* noctule (*Nyctalus noctula),* and whiskered bat (*Myotis mystacinus).*

5 STAGE 1A – POTENTIAL RISKS AND THREATS TO DESIGNATED SITES

5.1.1. The following section outlines the potential risks that could be posed to the European designated sites within the ZoL as direct and indirect consequences of construction or operational phase actions at the proposed development.

5.2. DIRECT IMPACTS ON EUROPEAN SITES WITHIN THE UK – QUALIFYING FEATURES

River Dee And Bala Lake/ Afon Dyfrdwy A Llyn Tegid SAC

5.2.1. No qualifying habitats were identified on site due to a lack of riparian habitats associated with the designated site. No Annex 1 habitats are present within Queensbridge Farm, and no negative impacts including degradation or removal is anticipated as a result of development.

5.2.2. Due to a lack of suitable habitats, the site provides negligible potential for the Annex 2 present as a qualifying feature including Atlantic salmon, floating water plantain, sea lamprey, river lamprey, brook lamprey, and bullhead.

5.2.3. There is the potential for a stream bordering the southern aspect of the site to support commuting and foraging otters, and their presence is unknown. However, the stream is isolated from watercourses present in the wider area and those connecting to the River Dee. Although unlikely, otters populating the River Dee catchment may be present within the stream on site, due to their large territories.

5.2.4. Without mitigation, there is the possibility of a direct impact upon otters, a qualifying feature of River Dee and Bala Lake/ Afon Dyfrdwy A Llyn Tegid SAC.

5.2.5. It is considered that the proposed development will have no other direct significant impact on the qualifying features of River Dee and Bala Lake/ Afon Dyfrdwy A Llyn Tegid SAC.

Midland Meres & Mosses (Phase 1 and Phase 2) Ramsar

5.2.6. No qualifying habitats were identified on site due to a lack of open water, peatland, fens, swamps and damp pasture habitats associated with the designated site. No Annex 1 habitats are present within Queensbridge Farm and no negative impacts including degradation or removal is anticipated as a result of development.

5.2.7. The Ramsar sites are located 7.6 km from the designated site at the closest point and separated by anthropogenic barriers such as highways that no incidents of pollution are anticipated. Furthermore, the designated site is located upstream from the proposed development site, preventing runoff and discharges that may degrade wetland habitats known to be present on site.

5.2.8. As such, it is considered that the proposed development will have no direct significant impact on the qualifying features of Midland Meres & Mosses Ramsar.

West Midland Mosses SAC

5.2.9. No qualifying habitats were identified on site due to a lack of quaking bog and wetland habitats associated with the designated site. No Annex 1 habitats are present within Queensbridge Farm and no negative impacts including degradation or removal is anticipated as a result of development.

5.2.10. The SAC is located 7.9 km from the designated site at the closest point and separated by anthropogenic barriers such as highways that no incidents of pollution are anticipated. Furthermore, the designated site is located upstream from the proposed development site, preventing runoff and discharges that may degrade wetland habitats known to be present on site.

5.2.11. As such, it is considered that the proposed development will have no direct significant impact on the qualifying features of West Midland Mosses SAC.

Johnstown Newt Sites SAC

5.2.12. There are a total of eight ponds within 250 m from the site boundary and a further 27 ponds within 500. The ponds are all suitably connected to the development site through hedgerows and treelines. The presence of great crested newts within the offsite ponds is unknown.

5.2.13. However, Johnstown Newt Sites SAC is located over 8 km from the proposed development site and separated by several anthropogenic barriers that would prevent great crested newts from commuting between the designated site and development site. Should the species be present in ponds surrounding the development site, they are not anticipated to exist in a metapopulation with those populating the designated site. Appropriate mitigation will be adhered to concerning potential for great crested newts within 250 m of the development site.

5.2.14. As such, it is considered that the proposed development will have no direct significant impact on the qualifying features of Johnstown Newt Sites SAC.

5.3. INDIRECT IMPACTS ON EUROPEAN SITES WITHIN THE UK

River Dee And Bala Lake/ Afon Dyfrdwy A Llyn Tegid SAC

Scrub Control and Urban Infrastructure

5.3.1. The proposed development will have no influence on the land management or construction within the River Dee and Bala Lake SAC and is therefore not anticipated to exacerbate the impacts of scrub encroachment and construction upon migratory fish species.

5.3.2. It is considered that there will no increase in the impacts of scrub control and urban infrastructure because the proposed scheme.

Water Pollution

5.3.3. The proposed development may cause an increase in discharge and runoff to adjacent habitats, without suitable mitigation measures, which in turn could pollute the River Dee and Bala Lake SAC through groundwater. The development site sits at a higher elevation than the SAC, making it possible that pollutants could travel from the lodges into the SAC.

5.3.4. Due to the small scale of the development, water pollution within the SAC is anticipated to be marginal, but present, nevertheless.

Non-Native Invasive Species

5.3.5. The proposed development may cause an increase in recreational pressures which could encourage the spread of non-native invasive species whereby people do not stick to marked paths and inadvertently spread seedlings or contaminated soil.

5.3.6. **Due to the small scale of the scheme, this impact is anticipated to be minimal, but present, nevertheless.**

RTAs Involving Otters

5.3.7. The proposed development may cause a small increase in vehicles on roads within and around the River Dee catchment, which could potentially increase the number of otters within the SAC injured or killed.

5.3.8. There is the potential for increased numbers of otters forming the SAC population to be involved in RTAs as a result of the proposed development.

Midland Meres & Mosses (Phase 1 and Phase 2) Ramsar

Eutrophication and Non-Native Invasive Species

5.3.9. Ramsar sites are located 7.6 km from the designated site at the closest point and separated by anthropogenic

barriers such as highways that no incidents of pollution are anticipated. Furthermore, the designated site is located upstream from the proposed development site, preventing runoff and discharges that may introduce excess nutrients into the wetlands and encourage eutrophication within the sites.

5.3.10. However, it is possible that there will be an increase in recreational pressure as a result of development. This could encourage the spread of non-native invasive species whereby people do not stick to marked paths and inadvertently spread seedlings or contaminated soil. Furthermore, the addition of dog waste will add further nutrients into the wetland and encourage eutrophication. Due to the small scale of the scheme, this impact is anticipated to be minimal, but present, nevertheless.

5.3.11. As such, the proposed development may have an indirect impact on eutrophication and the spread of non-native invasive species as a result of recreational pressures.

West Midland Mosses SAC

Water Pollution and Hydrological Changes

5.3.12. West Midland Mosses SAC is located 7.9 km from the designated site at the closest point and separated by anthropogenic barriers such as highways that no incidents of pollution are anticipated. Furthermore, the designated site is located upstream from the proposed development site, preventing runoff and discharges that may degrade wetland habitats known to be present within the SAC.

5.3.13. Many of the impacts of hydrological changes at the site are a result of historic drainage, making the site no vulnerable to groundwater abstractions and artificial flooding. The proposed development is not anticipated to exacerbate these impacts.

5.3.14. It is considered that there will no increase in the impacts of water pollution and hydrological changes because the proposed scheme.

Air Pollution

5.3.15. West Midland Mosses SAC is located 7.9 km from the designated site, making it unlikely that all tourist vehicles will bypass the SAC. Furthermore, the proposed development will only incorporate 10no. lodges, making the increase in traffic negligible.

5.3.16. It is considered that there will no increase in the impacts of air pollution because the proposed scheme.

Inappropriate Scrub Control; Game Management; Forestry & Woodland Management; and Habitat Fragmentation

5.3.17. The proposed development will have no influence of the land management of West Midlands Mosses SAC including the control of scrub within the transition mire; restocking of land in close proximity to Abbots Moss; or nutrient enrichment. There will also be no influence upon the management of pheasant pens and populations at Clarepool and Chartley Mosses, known to cause erosion and damage to ground flora.

5.3.18. It is considered that there will no increase in the impacts of land management, game management, or habitat fragmentation because the proposed scheme.

Johnstown Newt Sites SAC

Recreational Pressures

5.3.19. Most of the recreational pressures are due to the communities of Johnstown and Rhosllanerchrugog which are situated close to the SAC. The biggest recreational pressures relate to young people introducing fish into the units as well as the use of off-road motorbikes, known to reduce breeding success; pollute pond water; and erode terrestrial habitats.

5.3.20. Fishing is not currently permitted at the site, making it unlikely that tourists utilising the new development will travel to the SAC for this purpose. Furthermore, the distance between the SAC and the development site will act as a further deterrent.

5.3.21. Tourists are also not anticipated to increase the impacts of off-road motorbikes within the SAC.

5.3.22. It is considered that there will no increase in the impacts of recreational pressures because the proposed scheme.

Owner/Occupier Objectives

5.3.23. The site has 10 owners with varying interests in the site including quarrying, landfill, housing and development, conservation of protected species and habitats and recreation. The proposed development will have no influence upon the owner/occupier objectives and is not anticipated to exacerbate any problems regarding this.

5.3.24. It is considered that there will no increase in the impacts of owner objectives because the proposed scheme.

6 STAGE 1B – COMBINED EFFECTS

6.1. ASSESSMENT OF IN-COMBINATION EFFECTS

6.1.1. In addition to assessing the effects of the proposed development on European sites within the UK, as part of stage one of the HRA assessment it is necessary to assess the cumulative effects of it with other local planning permissions and plans.

6.1.2. The area surrounding the site has a history of small householder and residential development. A review of the relevant planning portal (undertaken on 8th May 2025) identified the following planning applications surrounding the site boundary:

- Numerous small householder applications.
- **P/2019/0669** - JONELL QUEENSBRIDGE OVERTON WREXHAM LL13 0LE: CONVERSION OF BARN TO FORM DWELLING TOGETHER WITH SINGLE-STOREY EXTENSION (REFUSED)
- **P/2018/0229** - LAND AT KNOLTON BRYN FARM KNOLTON OVERTON WREXHAM LL13 0LE: OUTLINE PLANNING APPLICATION TO ERECT AGRICULTURAL WORKERS DWELLING WITH ASSOCIATED ACCESS (APPEAL ALLOWED)
- **P/2023/0578 -** METHODIST CHAPEL KNOLTON OVERTON WREXHAM LL13 0LE: TRAWSNEWID CAPEL I ANNEDD / CONVERSION OF CHAPEL INTO A DWELLING (GRANTED)
- **P/2025/0167 -** TROTTING MARE CARAVAN PARK, KNOLTON, OVERTON, WREXHAM, LL13 0LE: REPLACEMENT OF 18 NO TOURING PITCHES WITH 18 NO STATIC CARAVANS WITH ALL ASSOCIATED WORKS (UNDER CONSULTATION)

6.1.3. There is minimal planning applications within the surrounding area dated within recent years. Many of the applications relate only to small-scale extensions; loft conversions; and agricultural buildings, with most pre-dating 2010. These applications will not have any significant cumulative impacts upon any European designated site within the ZoL.

6.1.4. There are several applications dated between 2018-2023 relating to single dwellings, which are not anticipated to cause significant cumulative impacts upon any European designated site within the ZoL, due to their small scale and existing risk factors

6.1.5. A planning application for the replacement of 18 no touring pitches with 18 no static caravans with all associated works is currently under consultation approximately 1.4 km southeast from the site boundary. There is not anticipated to be any cumulative impacts as there is no net gain of holiday provisions above baseline and therefore no additional impacts on water pollution, highways, or recreational pressures.

6.1.6. Overall, it is not anticipated that there will be any significant cumulative impacts upon European designated sites within the ZoL.

7 SUMMARY OF PRELIMINARY SCREENING ASSESSMENT

7.1. DIRECT IMPACTS

7.1.1. Without mitigation, there is the possibility of a direct impact upon otters, a qualifying feature of River Dee and Bala Lake/ Afon Dyfrdwy A Llyn Tegid SAC.

7.2. INDIRECT IMPACTS

7.2.1. There is anticipated to be several indirect impacts upon European designated sites within the zone of influence.

7.2.2. Indirect impacts upon the River Dee and Bala Lake/ Afon Dyfrdwy A Llyn Tegid SAC include:

- **Water pollution:** there could be an increase in runoff to the SAC.
- **Non-native invasive species:** recreational pressures could aid in the spread of non-native invasive species.
- **RTAs involving otters:** increased numbers of vehicles on roads within the Dee catchment could increase the number of otter fatalities.

7.2.3. Indirect impacts upon the Midland Meres & Mosses Ramsar include:

- **Eutrophication:** dog waste from increased walkers could contribute to excess nutrients into the wetlands.
- **Non-native invasive species:** recreational pressures could aid in the spread of non-native invasive species.

8 STAGE 2 – APPROPRIATE ASSESSMENT

8.1. APPROACH TO APPROPRIATE ASSESSMENT

8.1.1. Where significant effects are likely, or it is uncertain if there would be significant effects, an Appropriate Assessment (AA) is required.

8.1.2. For an AA, the implication of the plan / project on each affected site must be assessed in light of its conservation objectives. The development of conservation objectives is required by the 1992 Habitats' Directive (92/43/EEC); an objective of this legislation is to achieve 'favourable conservation status' of the habitats and / or species features for which the site is designated.

IMPACT ASSESSMENT

8.1.3. Following the screening described in Section 5, the need for an AA has been identified for; River Dee and Bala Lake/ Afon Dyfrdwy A Llyn Tegid SAC and Midland Meres & Mosses Ramsar. In this section, an assessment of the implications for each site in view of that site's conservation objectives is made, in terms of the magnitude, duration, location and extent of effects. Assessments for each designated site are considered together as they share a Site Improvement Plan.

MITIGATION MEASURES

8.1.4. The 'Information to Inform an Appropriate Assessment' (IIAA) section also looks at potential mitigation measures which would be required to determine if the magnitude, duration, location and extent of effects can be reduced / removed. These mitigation measures would form part of the planning consent, including related planning conditions, for the Proposed Scheme, if approved. Mitigation measures can include both avoidance measures and reduction measures, but the former approach is preferred. Mitigation measures for each designated site are considered separately.

IN-COMBINATION IMPACTS

8.1.5. In-combination assessment of impacts should also be made in light of the development and other relevant plans / projects.

INTEGRITY TEST

8.1.6. The integrity test requires the competent authority to ascertain if the development (alone and in combination with other plans / projects) will not have a significant adverse effect on a site's integrity, which is defined as:

8.1.7. "The coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the level of populations for the species for which it was classified".

MONITORING

8.1.8. Details of required monitoring are described, either for the purposes of validating the findings of the AA, or as an early warning which would enable any actions resulting in an unexpected adverse impact to be stopped, paused, reduced, altered, or removed.

8.2. INFORMATION TO INFORM AN APPROPRIATE ASSESSMENT

8.2.1. As laid out in the scoping section, the scheme was identified as having potentially significant effects on European site(s) alone but not in combination during either the construction or operational phase.

8.2.2. Information to inform an AA for each designated site is provided. This information includes impact assessment comprising descriptions of the qualifying features of the designated sites and their conservation objectives as well as mitigation measures.

8.3. IMPACT ASSESSMENT

8.3.1. As laid out in the scoping section, the scheme was identified as having effects on River Dee and Bala Lake/ Afon Dyfrdwy A Llyn Tegid SAC and Midland Meres & Mosses Ramsar.

8.3.2. Indirect impacts upon the River Dee and Bala Lake/ Afon Dyfrdwy A Llyn Tegid SAC include:

- **Water pollution:** there could be an increase in runoff to the SAC.
- **Non-native invasive species:** recreational pressures could aid in the spread of non-native invasive species.
- **RTAs involving otters:** increased numbers of vehicles on roads within the Dee catchment could increase the number of otter fatalities.

8.3.3. Indirect impacts upon the Midland Meres & Mosses Ramsar include:

- **Eutrophication:** dog waste from increased walkers could contribute to excess nutrients into the wetlands.
- **Non-native invasive species:** recreational pressures could aid in the spread of non-native invasive species.

8.4. MITIGATION MEASURES

Direct impacts upon otters

8.4.1. A precautionary working method will be implemented during construction, including the following measures:

- A toolbox talk will be given to contractors regarding the possible presence of otters at the site.
- A pre-commencement inspection of the site will be undertaken for otters.
- Heras fencing will be erected around the working area to prevent encroachment within 8m of the watercourse.
- Any excavations will be covered overnight, or a ramp will be installed to enable any trapped animals to escape.
- The use of night-time lighting will be avoided, or sensitive lighting design will be implemented to avoid light spill on to the watercourse and any retained habitats which otters could use.
- Best practice pollution prevention measures will be implemented to minimise impacts to the watercourse and any retained habitats that otters could use.
- Any chemicals or pollutants used or created by the development should be stored and disposed of correctly according to COSHH regulations.

8.4.2. In the unlikely event that an otter holt or den is identified, works must cease and advise must be sought from a suitably qualified ecologist.

Water pollution

8.4.3. It is considered that there could be an increase in water pollution within the designated sites because of the proposed scheme should effluent be managed irresponsibly. However, an increase in water usage on site alone is not likely to impact the designated sites so as long as mitigation measures are followed.

8.4.4. The development is currently greenfield, as such, a suitable surface water management proposal will be required for the proposed development. A formal drainage strategy should be produced detailing that any effluent from the glamping pods will be contained within a closed-circuit system (such as connection to the main sewers or septic tanks) and not discharged into groundwater or watercourses.

8.4.5. Furthermore, there should be no use of herbicides, pesticides or fertilisers as well as any chemical dosing on site that have the potential to leach into groundwater or watercourses and ultimately into the designated sites.

8.4.6. It is to be noted that the development will not increase flood risk to the wider catchment area as a result of suitable management of surface water runoff discharging from the site.

8.4.7. To further mitigate impacts, it is recommended that a Homeowners Pack is made available to all visitors of the development highlighting the sensitivity of the area and impacts caused because of recreational disturbance.

8.4.8. It is recommended that the new lodges include a welcome pack for guests highlighting the sensitivity of the area and impacts caused because of recreational disturbance, as well as awareness of local otters.

8.4.9. The Homeowners' packs should comprise, but are not limited to;

- Introduction letter to the pack, setting out the issue and providing a contents page of included documents.
- Description of River Dee and Bala Lake/ Afon Dyfrdwy A Llyn Tegid SAC and Midland Meres & Mosses Ramsar and their features which should include a map explaining the boundaries of the designated site.
- An explanation of the sensitivities of features to recreational disturbance and key sensitive times for the features of River Dee and Bala Lake/ Afon Dyfrdwy A Llyn Tegid SAC and Midland Meres & Mosses Ramsar.
- List any access restrictions in the local area (e.g. under the Countryside and Rights of Way Act 2000 or Byelaws).
- Suggestions of alternative recreational sites (i.e. parks, walking or cycling routes).
- Code of conduct (i.e. not disturbing nesting birds, remaining on marked pathways to avoid spreading disease, refraining from BBQs and bonfires which may cause fire damage to priority habitats, biosecurity measures relating to the spread of Phytophthora ramorum, keeping dogs on leads during sensitive times of year and in areas known to be susceptible to Phytophthora ramorum).
- Legal penalties for disobeying the code of conduct.
- Suggested areas for hiking, running, and horse-riding opportunities for people to get involved in the local natural environment (including volunteering opportunities).
- Information on otter populations within the River Dee and Bala Lake/ Afon Dyfrdwy A Llyn Tegid SAC, their terrestrial habitat requirements, home ranges, and crepuscular nature, making them more wary when driving at dusk and dawn.

8.4.10. The following principles to be followed for the packs;

- The homeowner packs are tailored to the location of the development and River Dee and Bala Lake/ Afon Dyfrdwy A Llyn Tegid SAC and Midland Meres & Mosses Ramsar:
- Tailored to the audience using clear and easy to understand language.
- An appropriate format is used to present and share the householder packs (i.e. print, size).

8.5. INTEGRITY TEST

8.5.1. It is anticipated that implementation of the mitigation measures allows the competent authority to conclude that there will be no significant adverse effects arising from the proposed scheme, on the Conservation Objectives or the qualifying features of the designated sites.

8.5.2. The information provided in this report, should provide Wrexham Borough County Council, the competent authority, sufficient information to undertake an AA. The mitigation measures outlined should be conditioned as part of the planning application.

9 SUMMARY

9.1.1. Screening of Natura 2000 protected sites has established that the following sites have the potential to be affected by the implementation of the proposal:

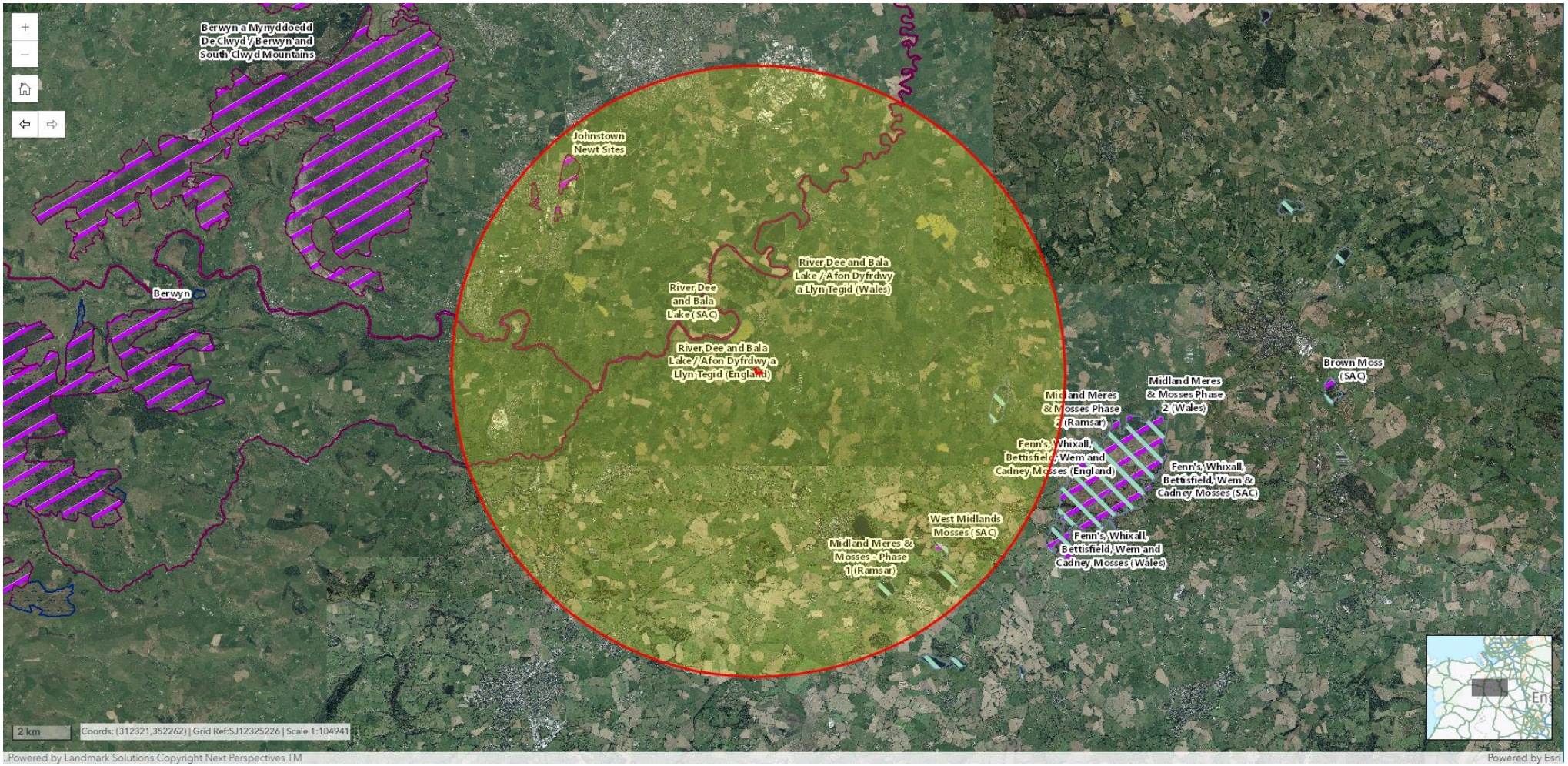
- River Dee and Bala Lake/ Afon Dyfrdwy A Llyn Tegid SAC
- Midland Meres & Mosses Ramsar

9.1.2. Following further screening of the special qualifying features of interest of the Natura 2000 sites concerned, consideration of potentially harmful operations on these features which could arise from the implementation of the planned development, consideration of the proposed mitigation for potentially harmful operations and consideration of possible in combination effects it has been concluded that the implementation of the application with appropriate mitigation will not have a significant impact on the special interest of the Natura 2000 Sites concerned.

9.1.3. That is, it has been ascertained that the proposed development will not have any harmful effects on special nature conservation interest of the Natura 2000 sites concerned and will not adversely affect the integrity of the Natura 2000 Sites concerned.

9.1.4. The conclusion is provisional on the requirement of adhering to mitigation measures outlined within Section 8.4.

10 APPENDIX 1



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