Wildbanks Conservation

Bank House Farm, The Trench, Ellesmere, Shropshire, SY12 9DR
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Mr & Mrs Onan-Read
The Lodge, Drury Lane
Ty Broughton, Whitchurch

11th March 2026

RE: The Lodge, Drury Lane, Ty Broughton, Whitchurch – Great Crested Newts

To whom it may concern,

I am writing to you in regard to the Natural Resources Wales Consultation Response dated 6th January 2026 relating to Wrexham County Borough Council planning application **P/2025/0949** at the above property.

Wildbanks Conservation have been asked to provide ecological information in regard to Great Crested Newts (GCN) and the proposed development: conversion of an agricultural building into a residential dwelling. Wildbanks Conservation were commissioned to prepare a Bat and Bird Survey Report dated 4th January 2026 in relation to this planning application, which included a visual assessment of the Site undertaken on 15th August 2025 by Mick Smith MCIEEM, Director Wildbanks Conservation (NRW GCN Licence No. S094688/1), followed by three nocturnal emergence surveys for bats and multiple conversations with the Mr and Mrs Onan-Read regarding the development and their plans and how they hope to deliver the project. Wildbanks Conservation are, therefore, suitably qualified to provide ecological information relating to GCN and this planning application.

The redline boundary of the proposed development consists of an agricultural barn, areas of hardstanding and a small area of managed lawn. The small area of managed grass (lawn) is completely encompassed by hardstanding and unsuitable habitat for GCN to use for foraging or shelter as its sward is too short and GCN would be susceptible to predation. The agricultural barn is used for storage and to keep horses in but is well kept and clean with no areas suitable for GCN for shelter and hibernation e.g. piles of building materials or substrate. The entirety of the Site provides negligible habitat for GCN.

Two dry, ephemeral ponds exist within the wider landownership boundary; one 140m and one 155m north of the proposed development site in the field grazed by horses. It is considered highly likely the water level of these ponds fluctuates significantly and that their ephemeral nature mean that they are present in only very wet conditions. These fields are grazed very short by horses with a sward height of less than 40mm. It is concluded that these ponds are of poor suitability for breeding GCN and the surrounding field is of poor foraging habitat for GCN.

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The closest pond that appears to have habitat suitable for GCN is 285m northwest of the proposed site and is outside of the client's land ownership so no visit to the pond has taken place. Eight further ponds exist between 300m and 500m of the Site. The separating habitat between these ponds and the site is arable and pasture agricultural fields bounded by hedgerows. It is acknowledged that most adult newts likely stay within around 250m of breeding ponds, but some can travel up to 500m. It is also known that GCN will only travel such distances if there is more suitable habitat beyond their breeding pond. The habitat surrounding these ponds consists of field edges, hedgerows and agricultural fields which does provide moderate habitat quality for GCN. It is considered unlikely that GCN would travel over 285m to poorer quality habitat present within the Site. The proposed development will not impact any pond in the wider area. Given this it is assumed that GCN are highly unlikely to occur within the redline boundary of the site.

When considering the poor quality GCN habitat on Site and the distance to potentially suitable habitat, it is considered that further GCN survey work is not required. However, precautionary mitigation will be implemented, given the number of ponds within 500m of the Site and the possible connectivity between these ponds and the development site. It is recommended that a precautionary Reasonable Avoidance Method Statement be created and followed by contractors to ensure that the proposed development does not result in the disturbance, injury or killing of GCN. The proposed RAMS may include the below and should be adhered to before and during construction works.

Summarised Reasonable Avoidance Measures:

- A suitable qualified ecologist will be appointed to oversee the works.
- Prior to the commencement of works, a toolbox talk will be provided to onsite personal by a Natural Resources Wales licensed ecologist. The talk will include information regarding the protection of species, habitats, legal implications, their responsibilities and what to do if a protected species is encountered.
- All materials for the development will be stored, raised off the ground by 100mm so as not to create resting places for newts (e.g. on pallets).
- If GCN are found during works, works must stop immediately, and the licensed ecologist will be contacted, and advice sought: **Wildbanks Conservation; 01691 623505**.

I trust the enclosed information is enough to process the planning application reference P/2025/0949, in relation to protected species, but if you require any further information, please do not hesitate to contact me.

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Mick Smith MCIEEM, Director Wildbanks Conservation