Ecology rebuttal by Rebecca Price on 10/02/26 in response to further information submitted by Leigh Ecology on 05/02/26

Thank you for your response to our request for further ecological information.

We acknowledge receipt of the further information provided, however a number of points raised in our previous response remain outstanding, as set out below.

Response by Leigh Ecology to points set out within this document dated 10/02/2026 – The response is dated 12th March 2026; the responses will be provided both in this document in a red typeface and within appended documents where applicable.

The number, location and current status of ponds on site:

There is ongoing uncertainty regarding number, location and status of existing ponds on site due to inconsistencies between reports and plans. Figure 5 (Amphibian mitigation plan) on the right below shows one ephemeral pond at the southern end of the site boundary. However, the Phase 1 Habitat plan (left) in the original Ecological Appraisal shows two existing ponds at the southern end of the site.



Additionally, the Ecological Addendum dated 11th March 2025 confirms that works have been undertaken on site to enhance biodiversity. The ground depressions / ephemeral ponds identified as 'ponds to be excavated to become permanent' now appear to retain water throughout the summer months, as evidenced by the up-to-date aerial imagery below. As such, the Amphibian Mitigation Plan does not accurately reflect the current baseline habitat conditions on site. All drawings need to reflect the current status of habitat conditions.



The current status of ponds on site is not known. Given the proximity of other ponds within the local area and the presence of suitable terrestrial habitat for amphibians, including connectivity from the east, there is potential for GCN to be present on site. The GCN status of all ponds must therefore be established.

As previously advised, further surveys are required. It is recommended that a combination of survey methods is undertaken, including torchlight surveys and eDNA analysis as a minimum. The eDNA survey season runs from 15th April to 30th June, during which time water samples must be collected to ensure adequate detectability of GCN DNA.

The Ecological Appraisal and the most recent response refer to Ponds 5 and 6, implying that there are six ponds on site. This is unclear, as Ponds 5 and 6 appear to correspond to target notes rather than discrete pond features, as indicated on the Phase 1 Habitat Plan above. Clarification on this point is required.

The original ponds on site apart from the lake are located to the south of the site where two ephemeral ponds occur, there are shown on the original JNCC phase on plan as shown below.

An attempt to undertake eDNA on these ponds and a pond off site was undertaken, to feed into the PEA, when the survey was undertaken in May both the site ponds and the offsite pond was in a dry muddy state, therefore unable to offer a clear sample.

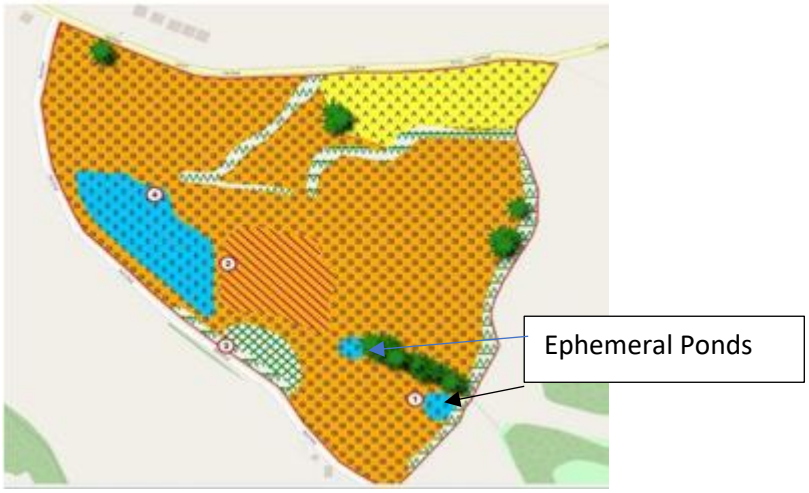
A further 3 pond are located to the north of the site; these are cascade pools which are designed to control the influx of flood water from the field drain which is fed from the road.

A detailed assessment is provided within the appended drainage report, and further information regarding the source and water quality is provided in the water quality report also appended to this document. It is understood that without the alleviation drains the road and adjacent farmland will flood.

By controlling the influx of the water from the field drain, the effect is to minimise the flooding and contamination of the field drains and habitat that they feed.

The GCN protection and enhancements combines a barrier temporary amphibian fencing to prevent the GCN accessing the site during the works, then post works enhancements by providing hibernacula within or adjacent to hedgerows and excavating and improving the ephemeral ponds on site to provide GCN breeding habitat.

The terrestrial habitat surrounding the ponds will be managed to offer good foraging and hibernating habitats.



Condition 2 of NRW's response: "No development shall commence until a Protected Species Conservation Plan has been submitted to and approved in writing by the Local Planning Authority.":

It is acknowledged that Leigh Ecology has included a GCN safeguarding area at the southern extent of the site; however, no further detail has been provided. Clarification is required regarding the extent and components of the safeguarding area. In addition, the safeguarding area does not appear to extend to the second pond located at the end of the tree line. The rationale for excluding this pond from the safeguarding area should be explained.

A full Protected Species Conservation Plan has not yet been submitted by Leigh Ecology. Any such submission should incorporate all measures set out within Natural Resources Wales' response dated 22nd April 2025.

Furthermore, a management plan has not been provided for the proposed ponds, the GCN safeguarding area, or the proposed wildflower areas. A management plan is required to set out long-term management objectives, management prescriptions, and monitoring arrangements, to ensure these features are appropriately maintained and continue to deliver biodiversity benefits.

Provision of Great Crested Newt (GCN) enhancements within a recreational site:

We acknowledge that enhancements have been proposed for GCN on site. Whilst biodiversity enhancement is required and supported in principle, it should be noted that the creation of such habitat would encourage GCN to colonise the development site. As a result, any future works or disturbance within or adjacent to this area could adversely affect GCN and may therefore require the implementation of strict protection zones, additional ecological surveys, and/or licensing. Furthermore, long-term habitat management commitments may be necessary, which could place constraints on how the recreational area is used or developed in the future. These implications should be fully considered and clearly set out.

The GCN protection and enhancements combines a barrier temporary amphibian fencing to prevent the GCN accessing the site during the works, then post works enhancements by providing hibernacula within or adjacent to hedgerows and excavating and improving the ephemeral ponds on site to provide GCN breeding habitat.

The terrestrial habitat surrounding the ponds will be managed to offer good foraging and hibernating habitats.

Bird survey effort in relation to the importance of Blast Road Pond Local Wildlife Site:

The latest ecological response acknowledges the importance of the Blast Road Pond Local Wildlife Site (which includes both aquatic and terrestrial habitat features) for bird species, including its value for species such as lapwing which is a species of conservation concern. However, no recommendations have been made for further survey work, despite the potential for adverse impacts on birds arising from the proposed development.

Our previous response requested additional information relating to both breeding and wintering birds. Wintering bird surveys may be undertaken between October and March inclusive, with the core survey period being November to February inclusive. Multiple survey visits are required across this period in order to capture variation in bird use over time. As the core wintering bird survey window has now passed, any required wintering bird surveys will need to be undertaken between October 2026 and March 2027.

The species frequenting the lake during winter are commoner species of Wildfowl, Mallard, Tufted Duck, passing Goosander, occasional Wigeon and other water birds, including Grebes, Moorhen and Coot.

Some birds are resident to breed however, predation from Corvids and from mammalian predators significantly impacts the breeding output.

Breeding bird survey information is also required and should be undertaken during the breeding season, which runs from March to August inclusive. A pair of lapwing were recorded during Spring, and this species could breed within habitats affected by the scheme.

The recent response from Leigh Ecology (dated 5th February 2026) states that “it is suggested that both island and shoreline nesting bird refuges are established and enforced during the breeding season.” Further clarification is required as to how these nesting bird refuges would be established and enforced in practice. In particular, it should be clarified whether this would involve restrictions on recreational activities during the breeding season.

It is proposed that all water based leisure activities are suspended on the islands and bird breeding shoreline during the bird breeding season, as previously mentioned some islands will be bird nesting islands therefore will be managed with substrate to attract birds, and these will be protected from disturbance. This will offer a safe nesting place with protection from terrestrial mammalian predators.

It is recommended that construction works are carried out outside of the bird breeding season. Where this is not possible, a pre-commencement check for active nests will be required by a suitably qualified ecologist. Should active nests be identified, this may result in delays to the programme of works.

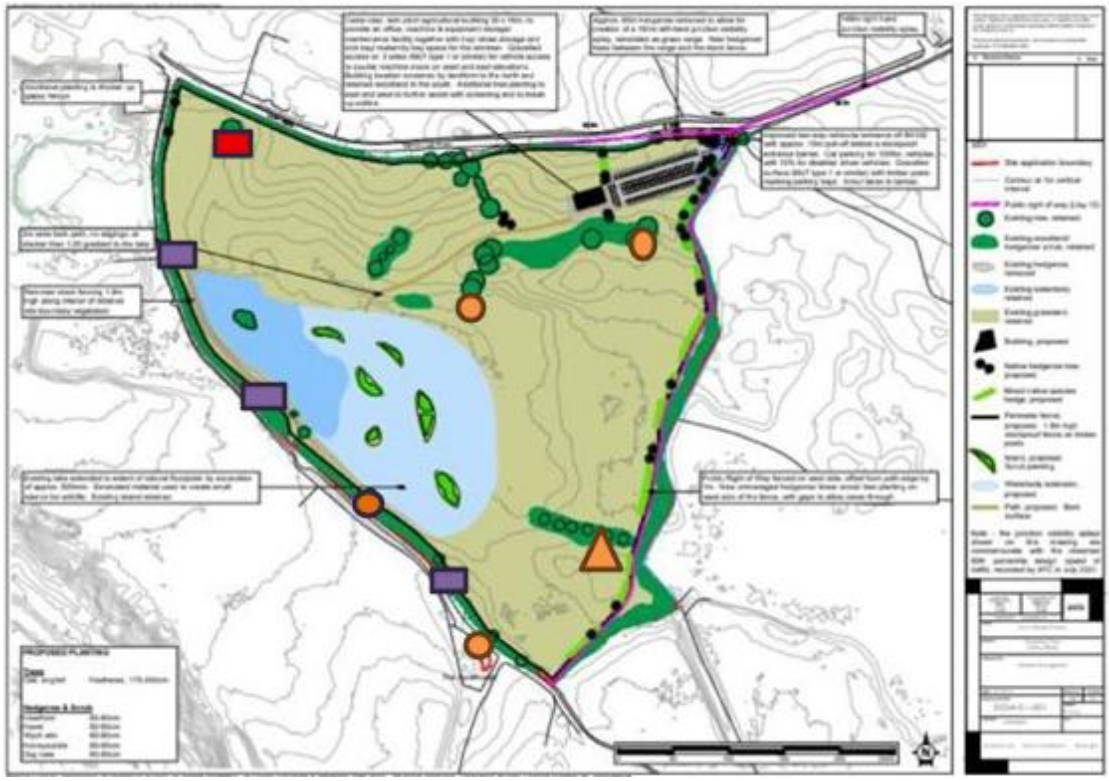
We agree with this condition, additionally it is suggested that given the changes, a more suitable way forward would be to undertake a program monitoring of the site and habitat provision, including habitat tweaks to improve usage with annual feedback to the LPA.

Additionally, the ecology response dated 5 February 2026, and the Ecological Appraisal recommend the protection of the existing marshy grassland habitat through the provision of a boardwalk to avoid trampling and disturbance. However, the proposed extension of Blast Road Pond would result in the direct and permanent loss of this marshy grassland habitat, as illustrated in the figures below.

This appears to be inconsistent with the stated aim of retaining and protecting the marshy grassland resource. Clarification is therefore required as to how the loss of this habitat is justified, and where loss is unavoidable, appropriate compensation measures should be clearly set out.

It is suggested that to compensate for the loss of this habitat a section of irrigated marshy grassland is provided on the northern shore of the lake, this will be fed by the cascade pond/drains as installed.





The marshy grassland shore area is prevalent when the lake increases in volume therefore flooding the area, this habitat will change dependant on the volume of rainfall.

Given this the proposal is to develop a wetland area in the northern area of the site using the cascading drainage water to maintain the hydrology of the grassland.

Grassland Creation and Management

The objective is to create the following habitat: Marshy grassland or wet grassland occurs on poorly drained, mainly acidic sites in lowland areas (valley bottoms and upland fringes) with high rainfall and wet soils. The habitat is usually dominated by various rush species and can have tussocks of Purple Moor-grass. It is often managed with other habitats, such as wet heath, wet flushes, scrub and drier grassland, making up a patchwork mosaic of diverse places that support a correspondingly rich diversity of wildlife.

The site should be grazed by cattle or ponies (sheep are generally not suitable as they can graze away many of the valuable flowers, though very extensive or occasional sheep grazing can be acceptable but requires close monitoring).

The following livestock types have been proven to be suitable: hardy breeds of suckler cow, Holstein Friesian dairy replacements or stores, hardier beef stores (such as Welsh Black or Belted Galloway).

The cattle grazing should be extensive in nature and should be limited to spring and summer on wetter sites, although autumn/winter grazing or all-year grazing can also be suitable, particularly on drier sites.

In general, a low stocking rate over a longer period is preferable. As the habitat varies between sites and over time stocking rates may also need to vary to reflect

prevalent conditions but as a general rule stocking rate should not exceed 0.2-0.3 livestock units/ha/year.

On seasonally grazed sites, roughly 1 cow every hectare (2.5 acres) for three months per year is recommended.

Grazing animals should be removed if the drier areas get grazed very short or if the ground is too wet.

Scrub cutting

Given the extensive nature of grazing there is the potential for some scrub to develop on the

Site. Small amounts of scrub are acceptable and may provide some shelter for invertebrates and perches for birds, however, cover of >5% is likely to be detrimental particularly if encroaching into grassland.

It is best to cut a little each year between October – February (to avoid the bird breeding season). It may also be necessary to treat the stumps with a suitable herbicide. The total clearance of scrub should be avoided however as it adds to the overall wildlife value of the land for other species.

Invasive weeds

Control the spread of highly invasive weeds, Himalayan Balsam in particular can be a particular problem in Marshy Grassland.

Himalayan Balsam can also be controlled by hand-pulling before it sets seed. Japanese Knotweed will require spot treatment with a suitable herbicide.

It is also planned to create a muddy ban/scrape on the shoreline of the lake between the marshy grassland and the lake, it is also planned to provide bird nesting substrate on the islands created, given both



Requirement for updated water vole surveys:

The latest ecological response dated 5th February 2026 states that "the surveys and assessments in respect of water vole are satisfactory when considered with extant information" and that "no water vole habitat occurs on site." However, a water vole survey was undertaken to inform the original Ecology Report, and the inclusion of water voles within the scope of the appraisal indicates that potentially suitable habitat was considered to be present on site at that time.

Although no evidence of water vole was recorded during the previous survey, the status of the site may have changed given the time elapsed since the survey was undertaken (2022). An updated water vole survey is therefore required and should be carried out during the optimal survey period to confirm current presence or absence.

Given that no Water Vole signs or sightings were noted during the previous survey, it is acknowledged that the period elapsed may result in a recolonisation, however, given the only potential watercourse suitable would be the lake, it must be factored that the lake contains a population of predatory fish, notably Pike, therefore given this it is very unlikely that Water Voles would share the aquatic habitat with such a predator.

Therefore, it is proposed that a pre works Water Vole survey is conditioned, with precautionary measures if a positive outcome is recorded.

Habitat box specifications:

The location and brief description of proposed habitat boxes has been provided, however Leigh Ecology should provide the exact specification of the boxes to be provided and note the suitable aspects of each box. E.G:

Schwegler 2F bat box (or equivalent) to be sited on a retained tree with a southern or western aspect at a minimum height of 3-4m: https://www.wildcare.co.uk/wildlife-nest-boxes/bird-boxes/bat-box-45.html?ppc_keyword=&campaignid=22698191254&adgroupid=&adid=&gad_source=1&gad_campaignid=22694470499&gclid=EAIaIQobChMIrI_7z-XOkgMVVZ1QBh1vcDAsEAQYAiABEgKKffD_BwE

Wildcare eco barn owl box (or equivalent) to be sited on a suitable retained mature tree with a northern or eastern aspect at a height of 3m: https://www.wildcare.co.uk/wildlife-nest-boxes/bird-boxes/owls/10201-eco-barn-owl-nest-box-nbc.html?ppc_keyword=&campaignid=22694501909&adgroupid=&adid=&gad_source=1&gad_campaignid=22688563815&gclid=EAIaIQobChMIq_LojeXOkgMVIZNQBh3x0xyVEAQYASABEgIEmfD_BwE

Schwegler 2m nest box with 26mm entrance (or equivalent) to be sited on an eastern or north-facing aspect of a retained tree: https://www.wildcare.co.uk/schwegler-2m-nest-box-26mm-entrance.html

Schwegler No.28 kestrel nest box (or equivalent) to be sited on solitary trees in a quiet location on an eastern or north-facing aspect at a minimum height of 2.5-3m: https://www.wildcare.co.uk/schwegler-no28-kestrel-box-10132.html

A bat and bird nestbox plan are appended this provides spec and siting details.

Condition 1 of NRW's response: "No works shall take place (including vegetation clearance) until a Reasonable Avoidance Measures scheme for otter, to include an otter-friendly lighting plan, has been submitted to and approved in writing by the Local Planning Authority.":

It is planned that no lighting will be provided on the areas with bat fight corridors as noted during the bat surveys to inform the PEA. Additionally, no lights wil be shining across the lake, or on any hedgerows. The lighting around the buildings will be on infra-red activity sensor system, therefore will shut off after a 20 second activity.

Reasonable Avoidance Measures for otter have been provided in the latest ecological response and are considered satisfactory. However, the following additional measures will also need to be implemented:

- A suitably qualified ecologist shall undertake a pre-construction check for evidence of otter within 48 hours prior to the commencement of works on site.
- All open excavations shall be covered overnight or provided with a suitable means of egress to prevent the entrapment of otters.

This will be carried out as requested in the above condition

Biosecurity:

We acknowledge the preventative measures for INNS outlined within the latest ecology response by Leigh Ecology. We consider these measures satisfactory for the proposed development given that no INNS were recorded on site.

Roy Leigh – 14th March 2026.