# Invasive Non-native Species Management Plan

## Wrexham

### Kellogg Company of Great Britain

Bryn Lane
Wrexham Industrial Estate
Wrexham
LL13 9UT

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# Acronyms and Abbreviations

| | |
|---|---|
| MP | Management Plan |
| NGR | National Grid Reference |
| OS | Ordnance Survey |
| SLR | SLR Consulting Ltd |

# 1.0 Introduction

## 1.1 Overview

SLR Consulting Ltd (SLR) has been appointed by the Kellogg Company of Great Britain Limited ('Kellogg's) to produce a Management Plan (MP) for those Invasive Non-Native Species (INNS) found within the development area of Wrexham Industrial Estate (hereafter referred to as 'the Site'). The Site is located at Kellogg's, Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9UT (Ordnance Survey (OS) National Grid Reference (NGR): SJ 38821 50506).

This report relates to planning application reference: P/2025/0406 that was granted subject to discharge of the conditions listed below on 27 November 2025. The consented development is for the 'Installation of plant, machinery, ducting, extractors and flues on the main building and expansion of the effluent treatment plant'.

This method statement has been produced to address the following planning condition attached to the appeal decision:

**Condition 4 states:**

*No development to the effluent treatment plant, including site clearance, shall commence until a Biosecurity Risk Assessment, and Method Statement that considers invasive non-native species and specific diseases (e.g. Chytrid) has been submitted to and approved in writing by the Local Planning Authority. The risk assessment shall include measures to prevent the introduction of and where present control, removal or for the long-term management of invasive species both during construction and operation. The risk assessment shall consider landscaping and other related plans. The Biosecurity Risk Assessment shall be carried out in accordance with the approved details*.

## 1.2 Site Description

To the south and west the Site is bounded by the industrial estate with a range of commercial and industrial activities. To the north and east of the Site is bounded by agricultural land with scattered residential dwellings within 1 kilometre (Km).

### 1.2.1 Site Connectivity

The Site offers potential connectivity for INNS dispersal through watercourses and road networks, the latter facilitated by vehicle and pedestrian movements. The wind direction in the area is predominantly north or east. To the south a drainage system and six ponds within the broadleaved woodland have been identified[1].

The biosecurity measures required to minimize risk of transporting plant materials via Site machinery, vehicles or clothing are detailed below.

[1] Crown Copyright and database rights 2024 (no date) *Magic Map*. https://magic.defra.gov.uk/MagicMap.html (Accessed: January 16, 2026).

## 1.3 Purpose of this Management Plan

The purpose of this management plan is:

- To detail biosecurity measures to minimise the risk of INNS as required by the Wildlife and Countryside Act; and
- To detail treatment to remove or control INNS from site.

## 1.4 INNS definition

For the purpose of this INNS management plan, the following definition of INNS has been applied. Furthermore, the species outlined within this report are those species which have been identified within the legislation outlined below:

"*Invasive non-native species (INNS), or invasive alien species, are those that are introduced, intentionally or unintentionally, outside of their natural geographic range, causing environmental, social and/or economic impacts"*[2].

There are various invasive plant species included within Schedule 9 of the Wildlife and countryside Act that could be spread within the Site, these include (but not limited to) Japanese knotweed (*Fallopia japonica*), giant hogweed (*Heracleum mantegazzianum*), and Himalayan balsam (*Impatiens glandulifera*). Further information on each species is show in Appendix A.

[2] UK Parliament (2022) *Invasive non-native species*. https://post.parliament.uk/research-briefings/post-pn-0673/ (Accessed: January 13, 2026).

# 2.0 Legislation

## 2.1 National

A summary of national legislation relevant to biodiversity in the UK is provided below.

### 2.1.1 Wildlife and Countryside Act 1981

The Wildlife and Countryside Act 1981[3] remains the primary piece of UK wildlife legislation that governs the release, control and spread of INNS. Most notably covered within the following:

- Section 14 (1) makes it an offence to release or allow to escape into the wild any animal not ordinarily resident in Great Britain or any species listed on Schedule 9; and
- Section 14 (2) makes it an offence if any person plants or otherwise causes to grow in the wild any plant which is included in Part II of Schedule 9; and
- Provides for the protection of Sites of Special Scientific Interest (SSSIs) and the designation of Nature Conservation Sites.

### 2.1.2 The Invasive Alien Species Order 2019

The Invasive Alien Species Order 2019[4] establishes a legal framework making many actions involving listed invasive species illegal – unless authorised under strict conditions — and sets out how permits or licences may be granted (or refused), with enforcement and penalties for non-compliance.

Key provisions:

- This bans the unauthorised handling or release of species identified on the order making it an offence to:
    - Bring species into the country; and
    - Keep, breed, transport, trade, reproduce or release them into the environment.
- Provides permitting for certain activities for research, scientific production, or for public interest.

### 2.1.3 Environmental Permitting (England and Wales) Regulation 2016

The legislative set out a single permitting structure for those activities that have the potential to cause harm to human health or the environment from industrial and waste installations[5].

[3] Participation, E. (no date) Wildlife and Countryside Act 1981. https://www.legislation.gov.uk/ukpga/1981/69/schedule/9.

[4] Participation, E. (no date a) The Invasive Alien Species (Enforcement and Permitting) Order 2019. https://www.legislation.gov.uk/uksi/2019/527/contents.

[5] King's Printer of Acts of Parliament (no date b) *The Environmental Permitting (England and Wales) Regulations 2016*. https://www.legislation.gov.uk/uksi/2016/1154/contents/made.

### 2.1.4 Environmental Protection Act 1990

The Act sets requirements for managing and disposing of waste, including soil and plant material contaminated with invasive species[6]. Most notably covered within the following:

- Soil containing species removed from Site is classified as controlled waste;
- Appropriate Duty of Care for its proper handling and disposal and must be taken to licensed facilities for disposal; and
- Failure to follow proper disposal procedures may lead to legal action and fines.

## 2.2 Local Planning Policy

The Wrexham County Borough Council's new Council Plan 2023-2028[7] sets out how the area will change and grow over the next 7 years.

*The framework consists of 12 objectives and related sub-objectives and indicators. The sub-objectives provide further information on how to interpret the headline objectives and are designed to guide the assessment:*

- *Objective 9: Protect, manage and enhance the natural and historic environment and landscapes;*
    - *Use natural resources efficiently and safeguard their quality*
        - *Avoid the spread of invasive species*.

## 2.3 Strategies

### 2.3.1 The Great Britain Invasive Non-Native Species Strategy 2023 to 2030

While not a legislative document, the following strategy is of relevance and should be considered. The Great Britain Invasive Non-Native Species Strategy 2023 to 2030 is a detailed strategy that outlines the aims and actions for addressing the threats posed by INNS, providing a framework to deliver effective response to preventing, eradicating and managing INNS, and improve co-ordination and co-operation by government stakeholders, land managers and the general public targeting INNS across Wales[8].

[6] Participation, E. (no date b) *Environmental Protection Act 1990*. https://www.legislation.gov.uk/ukpga/1990/43/contents.

[7] *Council Plan (2023-28)* | *Wrexham County Borough Council* (no date). https://www.wrexham.gov.uk/service/council-plan-2023-28.

[8] Invasive Non-native Species Strategy | GOV.WALES (2023). https://www.gov.wales/invasive-non-native-species-strategy (Accessed: January 19, 2026).

# 3.0 Biosecurity Management Measures

## 3.1 Impact without mitigation

Without mitigation, site clearance could result in the disturbance and dispersal of INNS on and off site resulting in a breach of the legislation.

## 3.2 Site Mitigation

Site wide management must be applied through specific mitigation measures due to the significance of INNS on Site and to reduce the risk of committing an offence. General management practises to be applied to the Site and project personnel are found below.

Where works are to take place within exclusion zones, it is recommended that treatment is carried out to remove INNS and prevent future instances. The location of INNS on Site will be recorded in a logbook, including the following essential details:

- Identification of species;
- Location of species;
- Date of observation;
- Abundance; and
- Photographs.

## 3.3 Mitigation For Reducing Spread

### 3.3.1 Toolbox Talks

Prior to the commencement of works on the Site the following tasks will be undertaken:

- A briefing regarding the common INNS likely to be found on site;
- Any measures to be taken to ensure site staff safety and prevent spread;
- The toolbox talk will outline the legal requirements to control the spread of INNS species;
- Highlight the importance of utilising washdown stations found at point of exit. This should highlight the responsibility of all operatives;
- Responsibility to report sightings of INNS or suspected INNS on site to ensure that the appropriate management and mitigation measures are implemented, and
- Responses should INNS be identified in a new area.

### 3.3.2 Exclusion Zones

Exclusion zones should be installed around all instances where INNS has been identified. Each species will be allocated a relevant buffer distance from the plant stand(s) that will be marked out to prevent the spread of the species. Buffer distances have been determined based on the species ecology, the likelihood of spread and the plant dispersal vectors. The relevant buffer distances for each species on Site are:

- Japanese knotweed – seven meters radius;
- Giant hogweed – four meters radius;
- Himalayan balsam – six meters radius;
- Wall cotoneaster (*Cotoneaster horizontalis*) – five meters radius; and

- Rhododendron (*Rhododendron ponticum*) – two meters radius.

### 3.3.3 Riparian Zone

INNS are known to spread through waterways, as such, Riparian zones (waterways and their banks) should be avoided and treated as exclusion zones. Should access to these areas be required, footwear should be cleaned before entry and on exit, following the washdown procedure it must be ensured that contaminated clothing is not worn outside of the riparian zone. If the riparian zone includes an active INNS exclusion zone, any additional controls required for exclusion zones should be followed.

### 3.3.4 Signage Around the Site

Information displayed in welfare facilities, such as within canteens and welfare vans, should mirror that delivered during the INNS toolbox talk. A copy of the toolbox talk should be included in all works packs, along with identification features for each species.

If INNS is discovered signage displayed at Site entry and exits points should highlight that personnel are entering an area that requires biosecurity measures in relation to INNS.

Signage along fencing to demarcate exclusion zones should clearly identify the area as a No Access Zone, except for those permissible activities which are to control INNS or required for health and safety purposes.

### 3.3.5 Fencing

Fencing should accompany signage. Fencing should be clear and obvious and be installed at the edge of the exclusion zone for each INNS area, at the corresponding buffer distance for the species present.

Fencing should be semi-permeable and easy to maintain in order to minimise vehicle traffic in the area. Fencing should allow passage of mammals that commute and forage across the Site including badger, roe deer, hare, rabbit and mole.

Fencing should be maintained and remain in-situ until an INNS specialist or suitably trained ecologist has determined the INNS species is no longer present in that location.

### 3.3.6 Wash Points

The Site should contain washdown facilities at the exclusion zone boundaries for permissible activities. Exclusion zone washdown locations should be located in areas that prevent the spread of contaminated soils from run-off to areas beyond the exclusion zone.

Washdown facilities will also be situated at Site access points. All persons and vehicles should utilise washdown facilities for footwear and tyres/tracks before exiting the Site, as an additional precaution.

Footwear should be clear of any mud or plant material, and tread should be clean and free of debris. Footwear worn on the Site must not be worn off the Site until a washdown process has been undertaken.

In addition, personal washdown kits should be carried with all personnel on the Site. Should access to any riparian zone be required, footwear must be cleaned as described above prior to entry of the riparian zone. Washdown stations should provide the following:

- Stiff bristled brush;
- Power washer;
- Uncontaminated clean water; and
- Containment of wash water to prevent it entering the environment.

### 3.3.7 Works With Exclusion Zones

Only permissible activities be undertaken within any identified buffer zones on the Site without specific permissions from an appropriately skilled person who will assess the precautions implemented.

Clothing worn within any buffer zones should be cleaned prior to use around the rest of the Site or use within other sites. The use of overalls would be recommended to provide an additional barrier that can be easily removed at the buffer zone boundary.

Should works require vehicles a temporary washdown must be located at the entry/exit location of that buffer zone. The washdown should be undertaken in a location where run-off from cleaning does not increase the risk of spread of INNS material. Where possible vehicles should remain on previously used tracks to reduce the risk of transporting contaminated soils.

No tracked vehicles are to be used within any exclusion zones on the Site. Should tracked vehicles be required for maintenance purposes, consultation with an ecologist or INNS specialist should be undertaken to ensure that areas of contaminated soils are avoided with the appropriate buffer applied.

### 3.3.8 Equipment and Machinery Considerations

Chemicals used for the control of non-native species must be stored in a safe, secure location that is away from any waterways.

Spill kits will be carried at all times to ensure that clean-ups can be undertaken quickly and reduce the impact to the environment.

### 3.3.9 Topsoil Excavated

The removal and storage of any topsoil will be carefully managed to ensure that there is no risk of contaminated soil being removed or introduced onto the site. The soil will be transported in a manner that prevents any possibility of accidental contamination during transport, by an appropriately licensed carrier and disposed of at an appropriately licensed waste disposal facility.

# 4.0 Biosecurity Risk Assessment

## 4.1 Introduction

An assessment based on a matrix comprising the likelihood of the potential of transfer and the probability of the impact occurring of Invasive Non-Native Species (INNS). Species can be spread to the wider environment a variety of methods, such as vehicles, or raw matrical transfer.

**Methods**

### 4.1.1 Risk Matrix

Risk has been evaluated against the Site ecological features, infrastructure, species ecology, on site operations and ease of spread and the location of on-site INNS.

The following categories have been applied to the species to visually represent risk of spread in the absence of control measures. Table 1 categorises the likelihood of INNS been present on Site. Table 2 categorises the impact onto the environment.

Table 1: Likelihood Of Presence

| Frequency | Criteria |
|---|---|
| 1 | Not established |
| 2 | Likely established but not dispersing |
| 3 | Established and dispersing at a low to moderate rate |
| 4 | Well, established and likely spreading |

Table 2: Severity Of Impact Risk To Development

| Severity | Criteria |
|---|---|
| No impact | No impact |
| Minor impact | Minor disruption |
| Moderate impact | Spread around the Site |
| Major impact | INNS becoming established and dominant |

## Overall Risk Rating

The Frequency and Severity of Impact were determined for an operation, the results were combined in the Risk calculation matrix shown in Table 3.

**Table 3: Calculation Matrix For Overall INNS Risk To The Development**

| Frequency/Severity | No Impact | Minor Impact | Moderate Impact | Major Impact |
|---|---|---|---|---|
| 1 | 1 | 1 | 1 | 1 |
| 2 | 1 | 2 | 2 | 3 |
| 3 | 1 | 3 | 4 | 4 |
| 4 | 1 | 4 | 5 | 6 |

# 5.0 Results

The results of the assessment are shown in Table 4.

**Table 4: Summary of Risk Assessment of INNS**

| Species | Likelihood (1-4) | Risk (1-4) | Total |
|---|---|---|---|
| Japanese knotweed | 1 | 3 | 3 |
| Cotoneaster | 2 | 1 | 2 |
| Giant hogweed | 1 | 1 | 1 |
| Himalayan balsam | 3 | 1 | 3 |

# Recommendations

It is recommended that appropriate mitigation for INNS should be untaken for all species with a greater emphasis on those options which have been progressed to Level 2 and which have generated a higher Risk Score.

# Appendix A Invasive Plant Species

## Invasive Non-native Species Management Plan

**Wrexham**

**Kellogg Company of Great Britain**

SLR Project No.: 416.065647.00001

4 March 2026

# Japanese knotweed (*Fallopia japonica*)

### Background

Introduced to the UK in the early 19th century as an ornamental plant. It is a perennial plant, growing each year from its extensive underground rhizomes. Very small fragments of stem or rhizome can give rise to new plants.

### Habitat

It can spread readily and grows in gardens, parks, and roadside verges.

### Environmental Problem

The roots and rhizomes, extend down 1 meter (3⅓ft) or more. Its roots become thick and woody, identifying feature is the orange colouring under their dark brown outer layer. The root system remains alive but dormant over winter. The plant forms dense stands, outcompeting our native vegetation and structural damage.

### Identify

| Photograph | Description |
|---|---|
|  | <u>Steam</u><br>The steam grows in a zig-zag pattern, green with purple and red speckles, hollow and grows to 2-3 metres in height. Can Grow up to 2cm a day. |
|  | <u>Leaves</u><br>Shovel shaped green leaves with flattish bases usually grow to about 14cm (5½in) in length and are arranged in a zig-zag pattern along the stems. New leaves are rolled up with dark red veins while mature leaves can grow up to 20cm. |
|  | <u>Flowers</u><br>Creamy white flowers, 0.5cm wide, forms clustered panicles that can grow to 10cm. Blooms very late summer (August/September) |
|  | <u>Seeds</u><br>Heart-shaped and feature small wings. Extremely rare for seeds to germinate. New plants grow from root nodes or pieces of stem. |

# Giant Hogweed (*Heracleum mantegazzianum*)

### Background

Giant hogweed is a perennial plant and a member of the carrot family. It originates from the Caucasus Mountains and Central Asia. It was introduced to the UK as an ornamental plant in the 19th century when it escaped and naturalised in the wild.

### Habitat

It can spread readily and grows along roadsides and water courses. It invades old fields and native habitats such as open woodlands.

### Health Concerns

The sap can cause skin to blister badly and in contact with sunlight can cause burns. Skin blistering can then recur over months and even years. The best way to avoid injury is to avoid contact with your skin. Wash the area thoroughly and immediately, seek medical advice and do not expose the area to sunlight for a few days.

### Identify

When it's fully grown, it can reach heights of up to five meters and have a spread of up to two meters. It forms a rosette of jagged, lobed leaves in the first year before sending up a flower spike in the second year and then setting seed.

| Photograph | Description |
|---|---|
|  | <u>Steam</u><br>Green, often with purple blotches and stiff, white, bristly hairs. Stems are hollow with ridges and have a thick circle of hairs at the base of each leaf stalk. |
|  | <u>Leaves</u><br>Up to 1.5m wide and 3m long, deeply divided into smaller leaflets. Like rhubarb leaves, with irregular and very sharp or jagged edges. The undersides of the leaves are hairy. |
|  | <u>Flowers</u><br>In June and July. They are small and white (or slightly pink) and are clustered on umbrella-like heads known as umbels that can reach a diameter of 60cm. All the flowers on the umbel face upwards |
|  | <u>Seeds</u><br>Dry, flattened and oval. Almost 1cm long with brown lines extending across three quarters of the seed length. |

# Himalayan balsam (*Impatiens glandulifera*)

### Background

Was introduced to the UK in 1839 as an ornamental garden plant but quickly spread into the countryside. The plant is native to the Himalayan region and grows rapidly causing issues for surrounding plants.

### Habitat

It grows in different habitats, however, dominantly along riverbanks or near other watercourses.

### Environmental Problem

When the plant begins to die back in the winter, they leave riverbanks bare which can lead to erosion or flooding and causing a decrease in biodiversity. The seeds are spread by humans and other wildlife by attaching them to clothes or fur.

### Identify

Plants can grow to a height of up to 2.5m. Himalayan balsam completes its life cycle within one year and dies in autumn. The roots are not strong and can be easily pulled from the ground.

| Photograph | Description |
|---|---|
|  | Steam<br>A singly hollow and hairless stem that can grow to lengths of 3 metres.<br>In spring the stem has some green colour but is mainly a yellow-green tinged with red. throughout all seasons. |
|  | Leaves<br>Are mid- to dark green in colour and oval in shape with serrated edges. They often reach sizes of 15cm in length and form in opposites or clusters of 3-5. |
|  | Flowers<br>They are pink or purple and can be occasionally white. They are shaped like a helmet and reach sizes of 3-4cm. They have a sweet-scented smell. |
|  | Seed Pods<br>The pod is mainly green with a reddish-brown ting near the stem. The shape is that of water or teardrops and reaches sizes of 2.5cm in length. When the pod is ripe it will explode on touch, dispersing its seeds. Each plant producing up to 800 seeds. |

# Wall cotoneaster (*Cotoneaster horizontalis*)

### Background

Was introduced to the UK in 1879 from Eastern Asia as an ornamental plant.

### Habitat

Disturbed places and stony ground. railway banks, cliffs, limestone pavement, quarries, chalk pits, pavements and walls.

### Environmental Problem

The plant forms dense stands, outcompeting our native vegetation. The root system is difficult to remove. Grows on valuable habitats including limestone grasslands.

### Identify

Green shrubs growing to 1 metre high and 1.5 metres wide. In January the shrub, has lost all its foliage.

| Photograph | Description |
|---|---|
|  | <u>Branches</u><br>The hole steams are without thorns, and the branches are in a shape of a ‘herringbone’.<br>The branches spread in a horizontally direction. |
|  | <u>Leaves</u><br>The leaves are waxy, hairless and broadly oval from 0.5 by 1.3 cm long. |
|  | <u>Flowers</u><br>Flower in spring, and has five petalled in white, tinged with pink, about 0.5 cm. diameter. Appear in clusters of two or three along the branches. |
|  | <u>Berries</u><br>The fruit ripen in autumn into a bright red 0.5 cm diameter berries |

# Rhododendron (*Rhododendron ponticum*)

### Background

It was introduced to the UK in 1763 as an ornament and game cover, into plant and was widely planted in gardens, parks and estates. The seed are dispersal by wind and spread into the countryside.

### Habitat

Common on acid, peaty or sandy soils in woodland, heathland, rocky hillsides, rivers banks, gardens and parks.

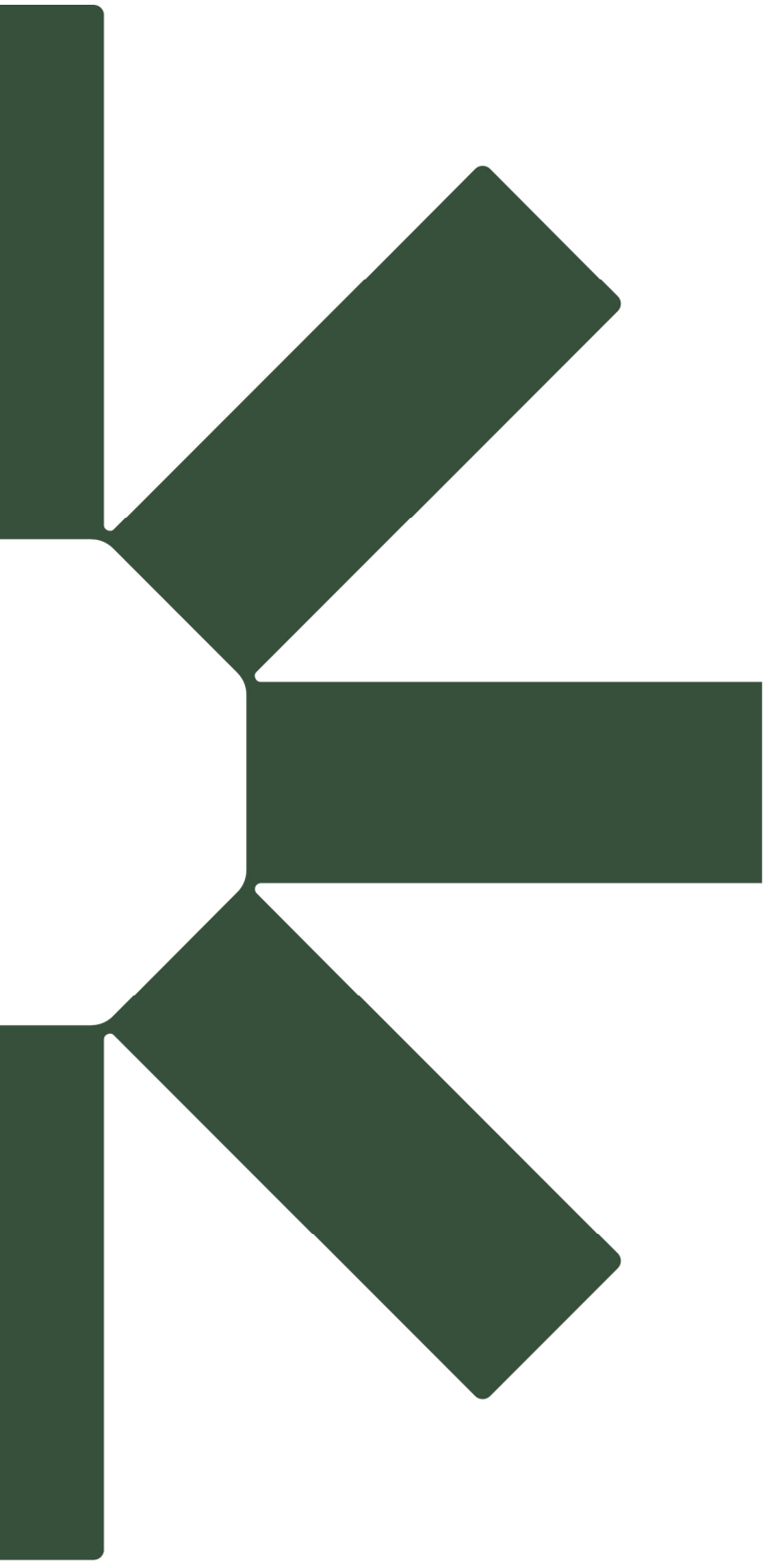
### Environmental Problem

The plant outcompeting our native vegetation in native woodlands and open ground habitats. Casting dense shade over watercourse and damaging to fence and poisoning of livestock.

### Identify

It starts flowering at 10 years old and can produce up to 1 million seeds annually. A shrub which grows to 5 meter (16 ft) tall.

| Photograph | Description |
|---|---|
|  | Steam<br>Stems/trunk often dense and twisted. |
|  | Leaves<br>The leaves are leathery, with dull green upper surface pale underside. Each leave is 6–18 cm long and 2-5 cm wide. |
|  | Flowers<br>Each flowers have five petals and are 3.5–5 cm in diameter, pink to purple, often with small greenish-yellow spots or streaks. They flower in groups of 14 to 25 bell-shaped flowers that grow in clusters in May–June. |
|  | Seed/Furit<br>Seed pods are formed after flowering. The fruit is a dry capsule 1.5-2.5 cm long, containing various number of seeds. |



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