Tyrer Ecological Consultants Ltd
Specialists in Protected Species

Roselands, Suite 1, 3, Cross Green, Formby, L37 4BH

www.facebook.com/ecologicalsurvey
www.linkedin.com/company/tyrer-ecological-consultants-ltd

Tel: 01704 875781
Email: kylee@tyrer-ecologicalconsultants.co.uk
enquiries@tyrer-ecologicalconsultants.co.uk

For: Blueprint Architectural Ltd

Site: Moreton Inn, Ruabon Road, Ruabon, Wrexham, LL14 6PU

National Grid Reference: SJ 3017 4548

Date of Issue: 24th March 2026

Re: Response to Ecology Officer Comments

Document Context

As part of a granted planning application with Wrexham County Borough Council (Ref: 2023/0095[1]) concerning the site of the former Moreton Inn in Ruabon, Tyrer Ecological Consultants Ltd were commissioned by Blueprint Architectural Ltd to undertake a Preliminary Ecological Appraisal (PEA) in February 2021. A series of subsequent ecological documents have been provided in the intervening timing; this letter should be read in conjunction with these documents which are available via the Borough Council's planning application search.

The scope of proposals involves the construction of nine dwellings with associated landscaping and access, following clearance of the site and demolition of the former public house.

During the initial PEA, the potential for impacts to great crested newts (GCN) was recognised due to the site's proximity to the Johnstown Newt Sites Special Area of Conservation (SAC), and despite its generally low habitat suitability for GCN. A programme of Reasonable Avoidance Measures (RAMs) was recommended to be created and adhered to throughout the development; following consultation with Natural Resources Wales (NRW) a more detailed document including RAMs, a biosecurity risk assessment, ecological compliance audit, and information to inform a Habitats Regulations Assessment was provided. This document also included an enhancement plan for the site.

The application was granted in December 2024 with a number of conditions, several of which relate to ecological matters:

"6. Within 12 months of the date of this decision, and prior to the commencement of construction works of any part of a dwelling hereby approved, the pond shown on plan ref: N035/015 'Pond Location' shall be implemented on site in strict accordance with a detailed construction scheme which shall have first been submitted to the Local Planning Authority for written approval. The pond shall thereafter be permanently retained, managed and maintained in accordance with a long terms ecological management plan, also to be submitted to the Local Planning Authority within 12 months of the date of this decision."

"7. Within 3 months of commencement of development, a long-term ecological site management plan shall be submitted to and approved in writing by the Local Planning Authority. The management plan shall include, but not necessarily be limited to:

[1] See: https://register.wrexham.gov.uk/pr/s/detail/a0lJ7000000Tv5DIAS?language=en_GB&c__r=Arcus_BE_Public_Register&tabset-ff68f=3

- *defined aims and objectives (including targets that can be used as key performance indicators for monitoring purposes);*
- *habitat management prescriptions for aquatic and terrestrial habitats;*
- *contingency prescriptions if post implementation any fish and/or invasive non-native species (INNS) are detected;*
- *Species surveillance*
- *site liaison, wardening, incident reporting and response arrangements;*
- *detail of the skills and competencies required by those undertaking the works or activities including whether they require European Protected Species licenses for the activities proposed;*
- *current and proposed changes to tenure of the ecology area (freehold tenure of the ecology area to be approved by the discharging Authority in consultation with Natural Resources Wales) to ensure appropriate control over the land is established and the effective targeted delivery of long-term actions;*
- *details of persons or bodies responsible for undertaking management and surveillance together with required skills and competencies;*
- *Financial resource provision; and*
- *provision for periodic review mechanism for the Environment Management Plan;*

The development shall be carried out in strict accordance with the site management plan as maybe approved and no more than 3 dwellings hall be occupied until the long term proposals have been implemented in accordance with the plan which shall thereafter be retained and managed for the life of the development."

These two conditions were addressed by Tyrer through the provision of a Pond Creation and Management Plan (August 2025) and an Ecological Site Management Plan (November 2025) respectively. In addressing Condition 7, Tyrer also took into consideration the comments provided by the (at the time) county ecologist at Wrexham Borough in relation to this condition:

"*There is some reference to the attenuation feature having biodiversity benefit, so we will be after something relatively simple on species to be sown and management details such as sward height or cutting regime. Nothing too onerous, but not the same as the off-site pond."*

Based on the provision of off-site habitat creation (Condition 6) and the enhancement of the attenuation area on-site (Condition 7), it was considered that sufficient mitigation which would result in a net benefit for general biodiversity and in-particular amphibians including GCN would be achieved.

2026 Ecology Officer Comments

Additional comments were provided by the Ecology Officer in 2026:

- A drawing illustrating the on-site habitat creation scheme referenced in Section 2.0 of the *Ecological Site Management Plan (November 2025)* has not been provided. An updated plan should clearly identify the areas proposed to be seeded with the Emorsgate EP1 Pond Edge Mixture.
- The proposed *native species-rich hedgerow* surrounding the attenuation feature is not shown on either the Landscape Plan or the updated *Ecological Site Management Plan (November 2025)*. This enhancement feature formed part of the approved scheme under planning permission **P/2023/0095** and should therefore be clearly indicated. The Landscape Plan should also include details of the hedgerow location and planting specification. The current drawing note states that species are "to be confirmed with the local authority"; however, this information is required at this stage and should be included within an updated Landscape Plan alongside the ecological enhancement measures referenced above and below.
- The revised plans do not show the hibernacula or scrapes that are indicated within Figure 4.2 of the *Ecological Site Management Plan (November 2025)*. These features should be

incorporated into the relevant drawings to ensure consistency between the management plan and the proposed site layout.

- Further clarification is required regarding the decision to remove the previously required **great crested newt mitigation fencing and 'newt-proof' gate**. The fencing has already been installed on site but does not appear to have been maintained in accordance with the requirements of planning permission **P/2023/0095** and Condition 12, as set out in the *Further Information Report*. It should be noted that the site remains connected to suitable **great crested newt** terrestrial habitat to the south and east, and therefore the removal of these mitigation measures requires further ecological justification.
- The *Proposed S104 Drainage Layout Plan* should include the requirement for amphibian-friendly gullies and associated recessed kerb features as illustrated in Figure 4.3 of the *Ecological Site Management Plan (November 2025)*. Note 28 on the drawing would be an appropriate location to reference this requirement.
- Note 29 of the *Proposed S104 Drainage Layout Plan* states that the SuDS feature will be "maintained by a private water management company set up by Taylor Wimpey NW". The prescribed management measures set out in Sections 2.0–5.5 of the *Ecological Site Management Plan (November 2025)* must be incorporated into any management contract with the appointed company. This is necessary to ensure that the approved ecological management measures are implemented and to avoid potential breaches of wildlife legislation in relation to protected species should the Ecological Site Management Plan or associated RAMS not be followed.

This letter therefore intends to address the comments pertaining to the removal of the hedgerow from the attenuation feature, and to the removal of the GCN fencing and gate from the RAMs for GCN (November 2025).

Response

In the first instance, it should be noted that the omission of the hedgerow and GCN fencing from the relevant document, as highlighted by the Ecology Officer, was deliberate and reflected the changing understanding and condition of the application site.

When the Further Information Report (September 2021) was produced, a commuted sum was suggested but had not been arranged. It was believed that the attenuation area would be the sole enhancement area for the site, and variety of habitats created was prioritised. However, following the agreement for the off-site pond creation at a location 0.8km to the north-east of the application site and in proximity to an existing pond network, and taking into account the prior comments regarding a simple habitat management plan, it was decided that focusing on maximising the quality of the marshy area would be most beneficial.

The Ecological Site Management Plan was therefore created to supersede the Further Information Report. Hedgerow planting was excluded from the plan as it was considered that it would have an overall negative impact on the attenuation area, reducing favourability for GCN. Negative impacts include:

1. A hedgerow would take up space in a relatively small area, that would be otherwise utilised for the marshy grassland, scrapes, and hibernacula. Though hedgerows are typically mapped as linear features, in reality a successful hedgerow occupies an area of 0.5-1m minimum width, beneath which very little will grow. The biodiversity enhancement area has an approximate area of 264m^2, and a circumference of approximately 77m. The inclusion of a hedgerow around the perimeter would therefore result in between approximately 15% and 29% of the area being utilised for hedgerow as opposed to wetter habitats.

2. The influence of the hedgerow would extend beyond the area it actually occupies; aiming to achieve a height of 1.5-2.0m would result in significant shade across much of the site, severely limiting the diversity of target plants which can successfully establish due to the

chosen seed mix targeting wet grassland habitat rather than shady woodland or hedgerow base habitat.

3. The woody hedgerow species would reduce soil moisture, with the roots removing water from the surrounding area and reducing wetness of the grassland area.

4. Leaf drop from woody species in the attenuation area would reduce in further shading of the grassland and could also cause increased enrichment of the soil and attenuation area, resulting in lower species diversity as grasses typical of enriched soils dominate.

Omission of the hedgerow is therefore considered the most favourable option for creating a diverse, wet grassland that will host a variety of invertebrate prey species and provide the most suitable habitat for amphibians.

With regards the fencing, the RAMs for GCN created in 2025 were updated relative to the Further Information Report to remove exclusion fencing following consultation with the 'Great Crested Newt Mitigation Requirements – Johnstown Newt Site SAC and the Wider Countryside'. This document gives local planning guidance which provides clear objectives for each planning application in relation to GCN mitigation, depending on their scale and location relative to known GCN ponds and the SAC.

The RAMs example provided within Appendix 4 of this document does not include fencing of the site to prevent GCN access, and is restricted to recommendations already included in the Tyrer RAMs, pertaining to safe storage of materials, clearance of vegetation, and site induction/toolbox talk.

In the case of the former Moreton Inn, the side of the site which has previously fenced due to its proximity to the SAC is already predominantly developed, with the exception of the hedgerow along the southern half of the western boundary which leads into an area of historically heavily managed and occasionally poached grassland. Following the supervised, graduated cutting of the grassland to 150mm and then to ground level, there will be no habitat suitable in this or any other area of the site. As the entire site will then be absent of refuge opportunities, the chances of GCN accessing the site will be negligible.

Furthermore, undertaking site clearance works in the 'aquatic' phase of the GCN lifecycle will ensure that even were GCN to occasionally utilise the site, at the time of year works were undertaken they would be within and around breeding ponds rather than sheltering in the wider terrestrial surroundings.

We can confirm that the contents of this document have been collated using the combined expert knowledge and experience of Tyrer Ecological Consultants Ltd, and thus this letter can be relied upon as an addition/supporting document to the existing ecological reports issued in relation to the works.

For any enquiries or if any information is required, please contact Tyrer Ecological Consultants Ltd on any of the specified mediums atop this letterhead.

