Erbistock Mill, Erbistock, Wrexham

Conservation Plan

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1 Introduction

1.1 Background

Planning permission has been granted for the variation of Condition 2 of planning permission P/2023/0483 to amend the approved plans through the addition of balconies at Erbistock Mill, Erbistock, Wrexham, LL13 0DW (Planning Reference P/2025/0848, Wrexham County Borough Council). Permission was granted on 22nd December 2025.

The site is a converted water mill building located on the western bank of the River Dee (National Grid Reference SJ 3542 4220). The development proposals comprise alterations to the existing building, including the cladding of the upper elevations in timber boarding, the extension of the upper-floor living accommodation within an existing area of upper-floor terrace, and the addition of balconies. No works are proposed within the channel of the River Dee and no riverside walkway is proposed.

This Conservation Plan has been prepared to discharge Condition 3 of the above planning permission, which states:

> *No development, including site clearance, shall commence until a site-wide habitat and species Conservation Plan has been submitted to and approved in writing by the Local Planning Authority. The Conservation Plan should include:*
>
> 1. *Details of protective measures to ensure no disturbance or harm of otters during the construction phase*
> 2. *Details of timing, phasing and duration of construction activities and conservation measures*
> 3. *Details of a biosecurity strategy, specifically Japanese knotweed and Himalayan Balsam*
> 4. *Details of any external lighting, and how it has been considered to prevent any lighting of the river corridor*
> 5. *Details of suitable pollution prevention and waste management measures to be undertaken during the construction works*
> 6. *Ecological Compliance Audit, including key performance indicators*
> 7. *Persons responsible for implementing the works*
>
> *The Conservation Plan shall be carried out in accordance with the approved details.*

To address this planning condition, an appropriate site-wide habitat and species Conservation Plan for the site has been devised (see below) by Richard Roe (BSc, MSc, MCIEEM, CEnv) of Kingdom Ecology Ltd.

Richard has over 25 years' experience as a professional ecologist and is a licensed bat worker.

A printed copy of this document will be kept on site at all times during the construction works and will be made available to all contractors.

1.2 Site Description

Erbistock Mill is a converted water mill building of pre-20th century origin, arranged over four storeys. The lower elevations are constructed of sandstone blockwork and the upper elevations of brick, beneath a pitched roof clad in slate.

The site is accessed via a hardstanding and gravelled driveway which leads to a parking area immediately to the north of the building, with a trackway running to the west of the building. A sandstone retaining wall runs along the western bank of the river and carries the parking area, trackway and building platform above it. Below the level of the retaining wall there is a narrow strip of vegetated riverbank, together with a vegetated sandbar which has developed within the river channel in front of the wall.

Adjacent habitats comprise the River Dee itself and extensive blocks of riparian woodland, with areas of arable and pasture beyond. The riparian woodland is not within the ownership or control of the applicant.

The site layout, the works area and the locations of the ecological features referred to within this document are shown on Figure 1 in the Appendix.

1.3 Ecological Baseline

1.3.1 The River Dee

The River Dee / Afon Dyfrdwy is designated as a Special Area of Conservation (River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid SAC) and as a Site of Special Scientific Interest. Qualifying features of the SAC include Atlantic salmon (*Salmo salar*), floating water-plantain, sea lamprey, brook lamprey, river lamprey, bullhead and otter (*Lutra lutra*), together with the Annex I habitat 'water courses of plain to montane levels with *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation'. The SSSI is additionally notified for its nationally important transition through a range of river types, for Atlantic salmon, otter, club-tailed dragonfly (*Gomphus vulgatissimus*) and for fluvial geomorphology.

No works are proposed within the river channel, and no works are proposed to the bed or banks of the river below the sandstone retaining wall.

The measures set out within this Conservation Plan, and in particular the biosecurity, pollution prevention and waste management measures at Sections 6 and 8, are designed to ensure that there is no pathway for effects upon the qualifying features of the SAC or the notified features of the SSSI.

1.3.2 Bats

Bat survey work at the site has confirmed the presence of small numbers of roosting soprano pipistrelle (*Pipistrellus pygmaeus*) within crevice features in the building's external stonework.

Six discrete roost features have been identified. Three are associated with the sandstone blockwork, window and balcony features of the south-west gable (Roosts 1 to 3), and three lie within the sandstone blockwork of the south-east-facing elevation overlooking the River Dee (Roosts 4 to 6). The roost locations are shown on Figure 2 in the Appendix.

Each roost comprises a small, separate crevice used by individual or low numbers of bats. The features are spatially distinct rather than forming a single clustered aggregation, and the building lies alongside a major foraging resource on the River Dee. The roosts are therefore considered to represent a series of day roosts used by low numbers of non-breeding soprano pipistrelle, a common and widespread species. Such roosts are of low conservation importance, and it is considered very unlikely that the building supports a roost of higher conservation status such as a maternity colony.

The proposed works would obstruct bat access to, and flight lines from, the roost features on the south-west gable and terrace, resulting in the loss of Roosts 1 to 3. Roosts 4 to 6, which lie within the lower south-east elevation below the extent of the proposed cladding, will be retained in situ. Measures relating to bats are set out at Section 4.

1.3.3 Otter

Otter spraint was recorded beneath the raised decking at the site during earlier survey work at the site (November 2022). At that time a weir ran diagonally across the river channel immediately adjacent to the building, and it was considered likely that otter passed beneath the decking in order to travel around the weir.

The weir was removed by the Environment Agency in 2025. Otter are now able to move freely along the river channel without any need to leave the water and pass along the bank beneath the decking, and the previously identified otter route around the weir is no longer present. No evidence of otter was recorded during site visits undertaken in May and June 2026, and no suitable otter holt sites have been identified within or immediately adjacent to the works area.

Notwithstanding the above, otter is a qualifying feature of the River Dee SAC and is known to use the river corridor. The precautionary measures set out at Section 5 will be implemented to ensure that no disturbance or harm to otter arises during the construction phase.

1.3.4 Invasive Non-Native Plant Species

Japanese knotweed (*Reynoutria japonica*) and Himalayan balsam (*Impatiens glandulifera*) are present at the site. Three small stands of Japanese knotweed were recorded during earlier survey work, located both upstream and downstream of the raised decking on the vegetated bank below the retaining wall. A fourth, smaller stand of Japanese knotweed has since become established immediately to the north of the existing decking area, within the footprint required for the erection of scaffolding; this stand was not present during the 2023 surveys and is of relatively recent origin. Himalayan balsam is present along the vegetated bank and sandbar.

Both species are listed on Schedule 9, Part II of the Wildlife and Countryside Act 1981 (as amended). It is an offence under section 14(2) of the Act to plant or otherwise cause these plants to grow in the wild.

The three original stands of Japanese knotweed, and the Himalayan balsam, are confined to the vegetated bank and sandbar below the sandstone retaining wall, at the water's edge, and are not rooted beneath the main works area above the wall. The recently established fourth stand of Japanese knotweed, however, lies within the works area at the point where scaffolding is required. The biosecurity strategy set out at Section 6 has been designed around this situation, and provides for the removal and containment of the fourth stand prior to the erection of scaffolding.

1.3.5 Other Species

No other protected or notable species have been identified as being likely to be affected by the proposed works. Nesting birds have not been recorded within the building; precautionary measures relating to nesting birds are nevertheless set out at Section 3.

2 Roles, Responsibilities and Implementation

Condition 3 requires that the persons responsible for implementing the works are identified. The roles and responsibilities associated with the delivery of this Conservation Plan are set out in Table 1 below.

A principal contractor has not yet been appointed. The names and contact details of the appointed principal contractor and site manager will be confirmed in writing to Wrexham County Borough Council prior to the commencement of development.

Table 1 – Roles and Responsibilities

Role	***Responsible party***	***Responsibilities***
Applicant / landowner	Mr Simon Roselli	Overall responsibility for ensuring that the measures set out within this Conservation Plan are funded and implemented; appointment of the principal contractor and of the Ecological Clerk of Works; ensuring the approved documents are issued to the contractor.
Agent	Mr Andy Foster	Correspondence with the Local Planning Authority; issue of approved documents to the applicant and contractor; submission of discharge of condition information.
Ecological Clerk of Works (ECoW) and Licensed Bat Worker	Richard Roe (BSc, MSc, MCIEEM, CEnv), Kingdom Ecology Ltd. NRW Bat Licence.	Delivery of the pre-commencement toolbox talk; demarcation of invasive species exclusion zones; supervision of all works affecting bat roost features; pre-works inspections; supervision of the installation of bat and bird boxes and created roosting features; ecological compliance audit and reporting; provision of advice if protected species are encountered.
Principal contractor	To be appointed	Day-to-day implementation of all measures set out within this Conservation Plan; compliance with pollution prevention, waste management and biosecurity measures; provision of reasonable access and notice to the ECoW.
Site manager	To be appointed	Ensuring that all operatives and sub-contractors are briefed on the contents of this document; maintaining a printed copy of this document on site; maintaining site records; notifying the ECoW in advance of works affecting bat roost features and immediately in the event that a protected species is encountered.

The ECoW will be available on call throughout the construction period in the event that any protected species are unexpectedly encountered during the works. If any bat or otter is discovered, all work in the immediate area will stop and the ECoW will be contacted for advice. Under no circumstances will any protected species be handled or disturbed by contractors.

3 Timing, Phasing and Duration of Works

3.1 Construction Programme

Construction works are anticipated to commence in Autumn 2026, with an overall build period of approximately 18 months. The works comprise the cladding of the upper elevations in timber boarding, works to the south-west gable and existing upper-floor terrace to form additional living accommodation, the addition of balconies, associated re-pointing and repair of the external stonework, and internal fit-out.

3.2 Seasonal Constraints – Bats

No exclusion of bat roosting crevices behind the proposed cladding, and no re-pointing works to crevice features, will be undertaken between 1st November and 1st March inclusive. This restriction is applied so that works to potential roosting features are not undertaken during the bat hibernation period, when bats may be present within crevices in a state of torpor and unable to respond or to be safely excluded.

Works affecting the roost features, including the erection of scaffolding to the affected elevations, will therefore commence in Autumn 2026. Where these works are not completed before 1st November 2026, they will be suspended over the winter period and resumed after 1st March 2027, extending into the early spring as required.

Works which do not affect potential bat roosting features, including internal fit-out and works to elevations where crevice exclusion and re-pointing have already been completed under ecological supervision, may continue throughout the year without seasonal restriction.

3.3 Licensing

No works affecting bat roost features will commence until a European Protected Species Licence has been granted by Natural Resources Wales (NRW). Written confirmation that the licence has been granted will be provided to Wrexham County Borough Council before those works commence. Further detail is provided at Section 4.

3.4 Nesting Birds

Nesting birds have not been recorded within the building. Nevertheless, as a precautionary measure, re-pointing and mortaring works to external crevice features, together with any minor vegetation clearance, will be undertaken outside the bird nesting season (March to August inclusive).

Where such works must be undertaken during the nesting season, a pre-works check will be carried out by the ECoW within 48 hours of the works commencing. Where an active nest is identified, works in that location will be delayed until the ECoW has confirmed that all young have fledged and that the nest is no longer in use.

3.5 Phasing of Works and Conservation Measures

The indicative phasing of the works, and the conservation measures associated with each phase, are set out in Table 2 below.

Table 2 – Phasing of Works and Associated Conservation Measures

Phase	***Indicative timing***	***Conservation measures***
Pre-commencement	Prior to any works, Autumn 2026	European Protected Species Licence granted by NRW and confirmed to the LPA; toolbox talk delivered by the ECoW; invasive species exclusion zones marked out and demarcated around the three stands below the retaining wall; the fourth Japanese knotweed stand within the works area cut back and contained beneath a root-barrier membrane; pre-works check for Himalayan balsam; three tree-mounted bat boxes installed as a receptor; site compound and storage areas established on existing hardstanding; printed copy of this document placed on site.
Scaffold erection	Autumn 2026	Scaffold accessed from the south to avoid the three Japanese knotweed stands below the retaining wall; minimum 3 m standoff from those stands during scaffold erection; scaffold over the treated fourth stand bearing onto a spreader layer over the root-barrier membrane, not directly on the membrane; debris netting and toe boards fitted to the riverside elevation.
Works affecting bat roost features (exclusion of crevices behind cladding and re-pointing of crevice features)	Autumn 2026, suspended 1st November to 1st March, resuming spring 2027 if required	All works undertaken under the NRW licence and supervised by the licensed bat worker; pre-works endoscope inspection of each feature; exclusion or supervised removal as required; retained Roosts 4 to 6 protected and left undisturbed.
Cladding installation and creation of new roosting features	Winter 2026 – 2027	Cladding fixed to battens of at least 25 mm and left open at the base; twelve access features created between the overlapping boards; eight created crevice features formed in the stonework; installation supervised and signed off by the ECoW.
Balcony installation, terrace	2027	No works within the river channel; no external lighting installed; otter precautionary measures maintained;

Phase	*Indicative timing*	*Conservation measures*
conversion and external works		pollution prevention and waste management measures maintained.
Internal fit-out and completion	2027 – 2028	Swift boxes installed; habitat piles created; completion inspection and compliance audit report by the ECoW.

4 Bats: Licensing, Working Method and Roosting Provision

4.1 Legislation and Licensing

All British bat species are protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017. All species of British bat are European Protected Species, and a bat roost is protected whether or not bats are present at the time.

The proposed works would result in the loss of Roosts 1 to 3 on the south-west gable and terrace. The works therefore need to be undertaken under a European Protected Species Licence, for which Natural Resources Wales is the licensing authority. As the identified roosts are of low conservation value and are used by a common and widespread species, the works are considered suitable to be undertaken under a standard NRW licence accompanied by an appropriate method statement.

No works affecting bat roost features will be undertaken in the absence of a granted licence.

4.2 Summary of the Licensed Working Method

The licensed method statement provides for the following, which is summarised here so that it is available to all contractors working at the site:

- The named ecologist on the licence will supervise all works that may affect roosting bats, including works affecting the stonework of the south-west gable and the south-east elevation.
- Prior to the start of works, a receptor will be provided to offer alternative roosting habitat for any bats encountered, comprising three Schwegler 2F® bat boxes (or similar) fitted to retained mature trees adjacent to the trackway leading to the mill.
- A toolbox talk will be given to the site contractors by the licensed bat worker, identifying the roost locations, the responsibilities of contractors under wildlife legislation, and the actions to take if a bat is encountered.
- Where areas of stonework are to be enclosed within new cladding, re-mortared, or otherwise affected by the works, the roost features and adjacent crevices will first be inspected using a torch and endoscope, from a scaffold or other suitable elevated platform, before works commence.

- Where bats are present and can be carefully removed by the licensed bat worker, they will be safely captured and placed within the receptor boxes.
- Where bats cannot be safely removed or the endoscope inspection is inconclusive, the roost feature will be fitted with a bat exclusion valve for at least one week, allowing bats to leave but not to re-enter, until the licensed bat worker is satisfied that no bats remain, after which the feature may be blocked or re-mortared.
- If a bat is encountered at any other time during the works, works will stop immediately and the named ecologist will be contacted for further advice.

4.3 Retained Roost Features

Roosts 4 to 6, within the lower south-east elevation, lie below the extent of the proposed cladding and will be retained in situ. These features will not be re-pointed, blocked, enclosed or otherwise obstructed, and will not be illuminated. The retained features are shown on Figures 2 and 3a.

4.4 New Bat Roosting Features

Existing roosting features will be retained wherever practicable. Where features will be lost through re-mortaring or cladding, replacement roosting habitat will be provided as set out below. All new features are shown on Figures 3a and 3b.

4.4.1 Created Crevice Features in Stonework

New crevices will be created within sections of wall that are re-mortared by inserting timber battens (approximately 2 cm by 5 cm in cross-section and 10cm in depth) into the wet mortar and removing them before it sets, creating crevices and bat access into the existing stone walls.

A total of eight such features will be created: six within the external walls of the south-east elevation and two within the south-west gable. The features will be created at a variety of heights up to the base of the proposed cladding, and their precise positions will be agreed on site with the ECoW.

4.4.2 Cladding as Bat Roosting Habitat

The proposed timber cladding to the upper elevations will itself provide high-quality bat roosting habitat, functioning as a large wooden bat box.

The cladding will be fixed to battens of at least 25 mm to provide a continuous crevice between the wall and the cladding, and will be left open at its base so that bats can crawl behind it.

Additional access points will be created higher on the cladding by periodically inserting battens between the overlapping boards, with three such features on each of the four clad elevations with twelve access features in total each located at a height of at least 5 m.

Where the cladding is to be treated, only timber treatment products approved for use in or near bat roosts will be used.

4.4.3 Tree-Mounted Bat Boxes

Three Schwegler 2F bat boxes (or similar approved alternative) will be installed on retained mature trees adjacent to the trackway leading to the mill, within the applicant's ownership. The boxes will be installed prior to the commencement of works affecting roost features, under the supervision of the licensed bat worker, and will serve both as a receptor during the licensed works and as a permanent enhancement thereafter.

The boxes will be installed at a minimum height of 4 m, positioned to avoid a north-facing aspect, and positioned so that the box entrances and the bat flight lines below the entrances are not obstructed by vegetation. The proposed box locations are shown on Figure 1 in the Appendix.

4.5 Summary of Bat Roosting Provision

Table 3 – Summary of Bat Roosting Features

Feature	*Number*	*Location*
Existing roost features retained in situ	3	Roosts 4 to 6, lower south-east elevation
Existing roost features lost	3	Roosts 1 to 3, south-west gable and upper-floor terrace
Created crevice features in stonework	8	Six on the south-east elevation; two on the south-west gable
Created access features in cladding	12	Three on each of the four clad elevations, at a height of at least 5 m
Continuous crevice behind cladding	All clad elevations	Cladding fixed to battens of at least 25 mm and left open at the base
Tree-mounted bat boxes	3	Retained mature trees adjacent to the trackway leading to the mill

The measures set out above result in an increase in the number of bat roosting features available at the site when compared with the baseline position. The contribution of these measures to the net biodiversity benefit for the site is set out within the accompanying Erbistock Mill Net Biodiversity Benefit Plan, prepared to discharge Condition 4.

5 Protective Measures for Otter

Although the previously identified otter route around the weir is no longer present and no evidence of otter was recorded during the 2026 site visits, otter is a qualifying feature of the River Dee SAC and continues to use the river corridor. The following precautionary measures will be implemented throughout the construction phase to ensure that no disturbance or harm to otter arises.

- No works will be undertaken within the channel of the River Dee.
- No works will be undertaken at the site between sunset and sunrise.
- No overnight lighting will be used at the site.
- Any trenches or other excavations left open overnight will be inspected each morning before works recommence, and will be fitted with a mammal ramp or have the sides battered to form a slope to allow any animal which has entered to escape.
- Any open pipework will be capped at the end of each working day to prevent animals entering.
- A tidy works area will be maintained throughout construction, and any hazardous substances will be securely stored and fenced off to remove any hazard to otter or other mammals.
- Other than scaffolding required to access the building's elevations, no materials, plant, spoil or waste will be placed or stored on the riverbank, on the sandbar or below the level of the sandstone retaining wall.
- If an otter, or a possible otter resting place, is encountered at any time during the works, all works in the immediate area will stop and the ECoW will be contacted for advice before works recommence.

The lighting measures set out at Section 7 and the pollution prevention measures set out at Section 8 provide further protection for otter and for the river corridor.

6 Biosecurity Strategy: Japanese Knotweed and Himalayan Balsam

6.1 Overview

Japanese knotweed and Himalayan balsam are present on the vegetated riverbank and sandbar below the sandstone retaining wall. In addition, a fourth, recently established stand of Japanese knotweed is present within the works area, immediately to the north of the existing decking, at the point where scaffolding is required.

The three stands below the retaining wall lie outside the works area and will be left undisturbed within demarcated exclusion zones, as set out at Section 6.2. The fourth stand lies within the works area and cannot be avoided; it will be cut back and contained beneath a root-barrier membrane prior to the erection of scaffolding, as set out at Section 6.3, so that the scaffold can bear over the treated area without disturbing the stand. In all cases the risk of spread arises principally from incidental disturbance and from the movement of soil, plant material or seed on footwear, tools, plant and scaffold components, and no excavation of rhizome is proposed anywhere at the site.

The locations of the stands are shown on Figure 1 in the Appendix.

6.2 Japanese Knotweed – Stands Below the Retaining Wall

The three stands of Japanese knotweed below the retaining wall lie outside the works area. No treatment or removal of these stands is proposed, and they will be left undisturbed for the duration of the works. The following measures will be implemented:

- Prior to the commencement of development, the ECoW will attend site to confirm the extent of each of the three stands below the retaining wall and to mark out an exclusion zone around each.
- Each exclusion zone will be physically demarcated using fencing or hazard tape and appropriate signage, and will be maintained and inspected for the duration of the construction works.
- No excavation, ground disturbance, or movement of soil or spoil will be undertaken below the retaining wall, in the vicinity of the three stands.
- A reduced standoff of 3 m will apply to the erection and dismantling of scaffolding. This reduced standoff is appropriate because scaffold erection involves no excavation or ground disturbance within proximity to the stands of Japanese knotweed.

- Access to the scaffold will be taken from the south, so that operatives, materials and plant do not pass through or immediately adjacent to the stands.
- No materials, plant, spoil, waste or welfare facilities will be stored within any exclusion zone.
- Scaffold components, tools, plant and footwear used in proximity to the stands will be inspected and cleaned before leaving the site, so that no soil or plant fragments are transported off site.
- No soil, spoil or plant material will be removed from within any exclusion zone, and no such material will be exported from the site.
- If Japanese knotweed is unexpectedly identified within the works area, all works in that location will stop and the ECoW will be contacted. A specialist Japanese knotweed management method statement would be produced in that event, prior to any further works in the affected area.

6.3 Japanese Knotweed – Stand Within the Works Area

A fourth, smaller stand of Japanese knotweed has recently become established immediately to the north of the existing decking area, within the footprint required for the erection of scaffolding to the building. This stand was not present during the 2023 surveys and is therefore of relatively recent origin. Its location is shown on Figure 1 in the Appendix and illustrated in Photograph 1 below.

Because this stand lies directly within the area over which scaffolding must be erected, it cannot be avoided by means of an exclusion zone. Excavation of the stand is not proposed, as excavation immediately adjacent to the River Dee would carry a high risk of fragmenting and spreading the rhizome. Instead, the stand will be cut back and contained beneath a root-barrier membrane prior to the erection of scaffolding, so that the scaffold can bear over the treated area without disturbing the stand or its rhizome. This is an interim containment measure which will allow the construction works to proceed safely; the eventual eradication of the stand by herbicide treatment is provided for at the end of this section.

The following method will be implemented prior to the erection of scaffolding:

- The work will be undertaken under supervision of the ECoW, or by a specialist invasive non-native species contractor.
- The extent of the stand will first be confirmed and marked out on site by the ECoW.
- The standing vegetative growth will be cut back to near ground level using hand tools. No excavation of the ground or of the rhizome will be undertaken.

- All cut material will be bagged on site and removed from site as controlled waste by a registered waste carrier, for disposal at a facility licensed to accept Japanese knotweed. Cut material will not be composted, buried or burnt on site.
- The cut area will then be overlaid with a proprietary root-barrier membrane of a type designed to resist Japanese knotweed rhizome penetration. Standard weed-suppressant fabric will not be used.
- The membrane will extend a minimum of 3 m beyond the visible extent of the stand in all directions, so far as the topography allows; where the proximity of the water's edge prevents a full 3 m margin on the riverward side, the membrane will be taken as far as is practicable and the edge turned up and secured.
- Membrane edges will be generously overlapped and secured, and the membrane pinned or weighted so that it remains in place for the duration of the works.
- Where scaffolding bears over the membrane, base plates will be seated on a spreader layer of scaffold boards or battens laid over the membrane, rather than directly on the membrane itself, so that it is not punctured
- The membrane will be inspected periodically for the duration of the works to confirm that it remains intact and that no regrowth has emerged around its edges. Any regrowth emerging beyond the membrane will be reported to the specialist and treated appropriately.
- All tools, footwear, plant and scaffold components used in proximity to the stand will be inspected and cleaned before leaving the area, so that no soil or rhizome fragments are transported elsewhere on the site or off site.

The measures above contain the stand for the duration of the construction works and prevent its disturbance or spread, but do not by themselves eradicate it, as the rhizome remains viable beneath the membrane. Following completion of the works and the removal of the scaffold, the stand will be eradicated by herbicide treatment. Treatment will be undertaken by an appropriately qualified operator over as many consecutive growing seasons as are necessary to achieve eradication, using a herbicide approved for use in proximity to watercourses and applied in accordance with the product approval and any consent required from Natural Resources Wales. This treatment will be secured through a Japanese Knotweed Management Plan.

Photograph 1 – Japanese knotweed stand within the works area, immediately to the north of the existing decking.



6.4 Himalayan Balsam

Himalayan balsam is present on the vegetated bank (scaffolding location) and sandbar and is not present within the main works area. The following measures will be implemented:

- A pre-works check will be undertaken by the ECoW prior to the commencement of development, and at the start of each subsequent growing season during the construction period, to confirm the extent of the plant and to identify whether any plants have colonised the works area.
- Any Himalayan balsam identified within, or immediately adjacent to, the works area will be removed by hand-pulling in advance of works in that location.
- Control will be targeted between May and July, which is the most effective period and is in advance of seeding, which generally occurs between August and October.
- Plants will be pulled or cut at ground level and below the first node to achieve the best results.
- Care will be taken to avoid contact with mature seed pods, which are capable of catapulting seed up to approximately 7 m.
- All arisings will be removed and disposed of appropriately. Arisings will not be composted on site, will not be deposited on the riverbank or within the river channel, and will not be exported from site as untreated green waste.

6.5 General Biosecurity

- All operatives will be briefed on the presence and appearance of both species as part of the pre-commencement toolbox talk.
- The principles of 'Check, Clean, Dry' will be applied throughout the works.
- A boot cleaning point will be provided at the site entrance, and footwear, tools and plant will be checked and cleaned before leaving site.
- All plant and vehicles will arrive on site in a clean condition, free from soil and plant material.
- No soil or aggregate will be imported to the site unless it is certified free from invasive non-native species.

7 External Lighting

No new external lighting is proposed as part of the development. No lighting is proposed on the balconies, on the external elevations of the building, on the decking, or elsewhere within the site.

The proposals make use of existing window apertures, and there will therefore be no increase in light spill from the main building beyond the existing situation. Some minor ambient light spill from internal lighting may occur when the balconies are in use. Any such spill will be intermittent, limited in extent, and will occur at high level on the building, well above the retained roost features at low level on the south-east elevation and above the river corridor at bank level. It is not considered that this would result in any significant illumination of the river corridor.

With regard to the construction phase, no works will be undertaken between sunset and sunrise and no overnight lighting will be used. There is therefore no requirement for temporary external construction lighting, and none will be installed.

The following commitments will apply for the lifetime of the development:

- The riverside elevation, the River Dee corridor, the sandbar and the vegetated bank will not be illuminated.
- The retained roost features (Roosts 4 to 6), the created crevice features, the cladding access features, the tree-mounted bat boxes and the swift boxes will not be illuminated.
- Should any external lighting be proposed at the site in future, it will be designed in accordance with Guidance Note 08/23: Bats and Artificial Lighting in the UK (Bat Conservation Trust and the Institute of Lighting Professionals, 2023). All lighting would be angled downwards and fitted with a protective cowl to reduce light spillage; a warm white spectrum (ideally below 2700 Kelvin) would be adopted to reduce the blue light component; and luminaires would have peak wavelengths greater than 550 nanometres.
- Any such future lighting proposals would be agreed with an appropriately qualified ecologist prior to installation.

8 Pollution Prevention and Waste Management

8.1 Site Set-Up

The site compound, welfare facilities, material storage and plant will be located on the existing areas of hardstanding, principally the parking area to the north of the building. Scaffolding required to access the lower elevations of the building may extend below the level of the sandstone retaining wall. No compound, storage or welfare facilities will be located below the level of the retaining wall, on the vegetated bank or on the sandbar.

Debris netting and toe boards will be fitted to the scaffold on the riverside elevation to prevent tools, materials or debris from falling into the river channel. Scaffold sheeting, where used, will be securely fixed.

8.2 Pollution Prevention

The proposed works, if carried out in an insensitive manner, could cause pollution of the River Dee corridor during the construction phase, whether through fuel or chemical spills, construction materials entering the river, or sedimentation. The following measures will be implemented:

- No discharge of any kind will be made to the River Dee.
- All fuels, oils, lubricants and chemicals will be stored within bunded containers or a bunded store of at least 110% of the capacity of the largest container, located on hardstanding and at least 5 m from the top of the retaining wall.
- Refuelling will be avoided on site wherever practicable. Where refuelling is unavoidable, it will be undertaken on hardstanding at least 5 m from the top of the retaining wall, over a drip tray, and using a nozzle fitted with an automatic cut-off.
- Cement, lime, concrete, grout and mortar products are highly alkaline and are particularly hazardous to aquatic life. Mixing will be undertaken within a designated, contained area on hardstanding away from the river edge.
- No washing out of concrete, cement, mortar, plaster or paint equipment will take place on site. Wash water will be contained and removed from site for appropriate disposal.
- Cutting of stone, masonry or other materials will be undertaken using dust suppression where practicable, and will be positioned so that dust, slurry and cuttings cannot enter the river.

- Re-pointing and mortaring works to the external elevations will be undertaken so that no mortar, slurry or wash water is permitted to fall or drain into the river channel; sheeting or containment will be used at low level on the riverside elevation where required.
- An appropriate spill kit will be maintained on site at all times and all operatives will be briefed on its location and use. Any spill will be contained immediately.
- In the event of a pollution incident which enters, or threatens to enter, the River Dee, works will stop, the spill will be contained, and Natural Resources Wales will be notified without delay via the incident hotline (0300 065 3000). The ECoW and the Local Planning Authority will also be notified.
- No bare ground will be left exposed adjacent to the top of the retaining wall, and no site drainage will be directed towards the river.

8.3 Waste Management

- All waste will be managed in accordance with the statutory duty of care. Waste will be removed from site by a registered waste carrier and taken to a suitably permitted facility, with waste transfer notes retained and made available on request.
- Skips and waste storage will be located on existing hardstanding within the compound area, and will be covered where lightweight materials are present to prevent wind-blown litter entering the river.
- No waste, spoil, arisings or surplus materials will be deposited on the riverbank, on the sandbar, within the river channel or within any invasive species exclusion zone.
- No burning of waste will take place on site.
- A tidy works area will be maintained at all times, with a daily tidy of the working area undertaken at the end of each working day.
- Waste arisings from any Himalayan balsam control will be handled and disposed of as set out at Section 6.3.

9 Ecological Compliance Audit

9.1 Approach

An Ecological Compliance Audit will be undertaken for the duration of the construction works. The audit will be carried out by the appointed Ecological Clerk of Works, Richard Roe (BSc, MSc, MCIEEM, CEnv) of Kingdom Ecology Ltd, who is also the named ecologist on the European Protected Species Licence.

The audit will confirm that the measures set out within this Conservation Plan have been implemented and appropriately completed, and will be measured against the key performance indicators set out at Section 9.3.

9.2 Site Visits

The ECoW will attend site at the following stages as a minimum. Additional visits will be undertaken where required by the licensed method statement or where requested by the site manager.

- Pre-commencement: to deliver the toolbox talk, to mark out and demarcate the invasive species exclusion zones around the three stands below the retaining wall, to supervise the cutting back and containment of the fourth Japanese knotweed stand beneath a root-barrier membrane, to undertake the pre-works check for Himalayan balsam, to confirm that the receptor bat boxes have been installed, and to confirm that the European Protected Species Licence has been granted.
- Prior to and during works affecting bat roost features: to undertake the pre-works endoscope inspection of each feature and to supervise exclusion, removal, re-pointing and enclosure works.
- During installation of the cladding: to confirm that the battening, open base and access features have been correctly installed.
- On completion of works to the stonework: to confirm that the eight created crevice features have been correctly formed and that the retained roost features remain unobstructed.
- At completion: to confirm that all bat roosting features, swift boxes and habitat piles are in place and fit for purpose, that no external lighting has been installed, and that the site has been left clear of waste and materials.

A written record will be made of each visit. Any non-compliance will be recorded, together with the remedial action agreed and the date by which it is to be completed. Significant non-compliance will be notified to Wrexham County Borough Council, and to Natural Resources Wales where it relates to the licensed works, within five working days.

9.3 Key Performance Indicators

The key performance indicators against which compliance will be measured are set out in Table 4 below.

Table 4 – Ecological Compliance Audit: Key Performance Indicators

Key performance indicator	***Evidence***	***Responsibility***
A European Protected Species Licence is granted by NRW before any works affecting bat roost features commence	Written confirmation issued to the LPA	ECoW / Applicant
A toolbox talk is delivered to all operatives before commencement, and to any new operatives joining the site	Signed attendance record	ECoW / Site manager
A printed copy of this Conservation Plan is kept on site at all times and made available to all contractors	Document available on site at each ECoW visit	Site manager
No exclusion of crevices behind cladding or re-pointing of crevice features between 1st November and 1st March	Site records and ECoW visit reports	Site manager
Roosts 4 to 6 are retained in situ and are not re-pointed, blocked, obstructed or illuminated	ECoW inspection and photographs	ECoW
Eight created crevice features are formed in the stonework (six south-east, two south-west)	ECoW inspection and photographs	ECoW
Cladding is fixed to battens of at least 25 mm, left open at the base, with twelve access features at a height of at least 5 m	ECoW inspection and photographs	ECoW
Only timber treatment products approved for use in or near bat roosts are used on the cladding	Product data sheets retained on site	Site manager
Three tree-mounted bat boxes are installed before works affecting roost features commence	ECoW inspection	ECoW
Six swift boxes are installed prior to first use of the development	ECoW inspection and photographs	ECoW
Two habitat piles are created prior to first use of the development	ECoW inspection	ECoW
Invasive species exclusion zones are demarcated before commencement and remain intact throughout the works	ECoW visit reports	Site manager
The fourth Japanese knotweed stand within the works area is cut back and contained beneath a root-barrier membrane before scaffolding is erected	ECoW / specialist watching brief record and photographs	ECoW / INNS specialist

Key performance indicator	*Evidence*	*Responsibility*
No spread of Japanese knotweed or Himalayan balsam occurs as a result of the works, and the root-barrier membrane over the fourth stand remains intact for the duration of the works	ECoW visit reports	ECoW
No works are undertaken between sunset and sunrise and no overnight lighting is used	Site records	Site manager
No external lighting is installed at the site	ECoW completion inspection	Site manager
Nil pollution incidents affecting the River Dee	Site incident log; ECoW visit reports	Site manager
No waste, spoil or materials are deposited on the riverbank, sandbar or within the river channel	ECoW visit reports	Site manager
Open excavations are inspected each morning and open pipework is capped overnight	Site records	Site manager
No works are undertaken within the river channel; works below the level of the retaining wall are limited to the erection, use and dismantling of scaffolding	ECoW visit reports	Site manager

9.4 Reporting

A completion Ecological Compliance Audit report will be prepared by the ECoW and submitted to Wrexham County Borough Council within eight weeks of the completion of the construction works. The report will confirm the outcome against each key performance indicator, will include photographic evidence of the installed ecological features, and will record any non-compliance together with the remedial action taken.

A copy of the completion report will also be provided to Natural Resources Wales in connection with the European Protected Species Licence.

10 Compliance with Planning Condition

This Conservation Plan has been prepared to discharge Condition 3 of planning permission P/2025/0848. Table 5 below identifies where each element of the condition is addressed.

Table 5 – Compliance with Condition 3

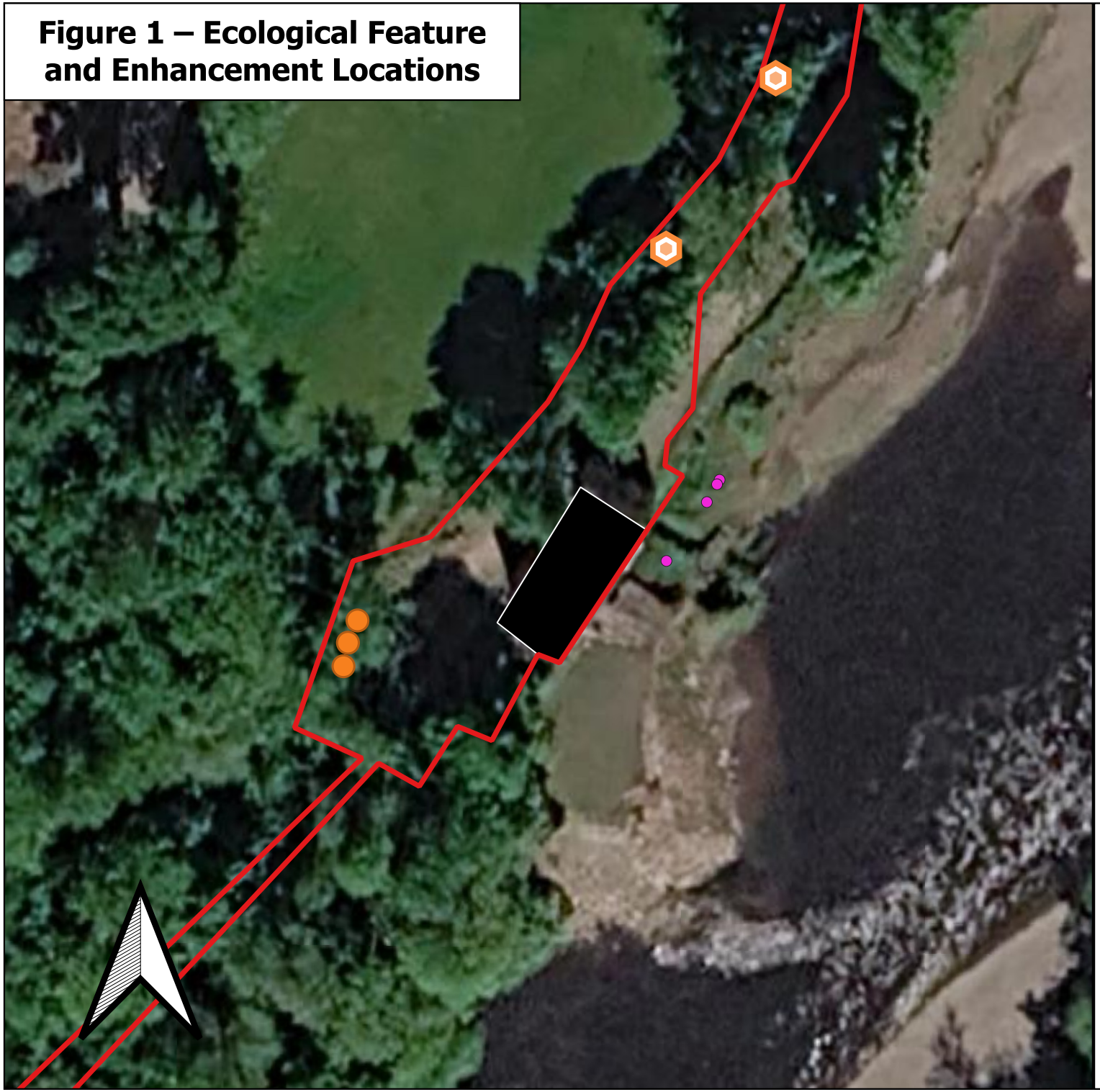
Requirement of Condition 3	***Addressed at***
Details of protective measures to ensure no disturbance or harm of otters during the construction phase	Sections 1.3.3 and 5
Details of timing, phasing and duration of construction activities and conservation measures	Section 3
Details of a biosecurity strategy, specifically Japanese knotweed and Himalayan Balsam	Sections 1.3.4 and 6
Details of any external lighting, and how it has been considered to prevent any lighting of the river corridor	Section 7
Details of suitable pollution prevention and waste management measures to be undertaken during the construction works	Section 8
Ecological Compliance Audit, including key performance indicators	Section 9
Persons responsible for implementing the works	Section 2

Upon approval of this Conservation Plan by Wrexham County Borough Council, all works will proceed in full accordance with the approved details. A printed copy of this document will be kept on site at all times during the works and will be made available to all contractors.

Measures to deliver a net benefit for biodiversity at the site, as required by Condition 4, are set out within the accompanying Erbistock Mill Net Biodiversity Benefit Plan.

Appendix

Figure 1 – Ecological Feature and Enhancement Locations



KEY

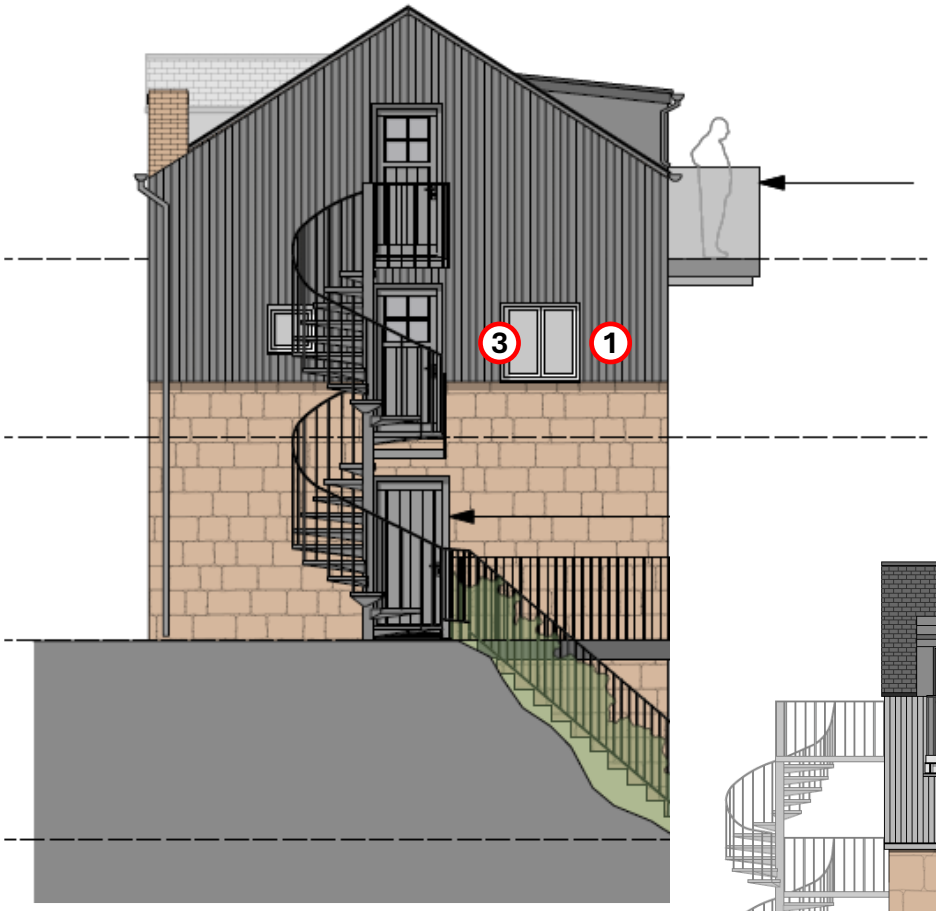
- Red Line
- Tree Box Location
- Building
- Japanese knotweed

See Figures 2 and 3 for Bat Roosting and Bird Box Features installed on Building exterior

0 10 20 30 m

Map data ©2026 Google

Figure 2- Retained and Impacted Bat Roosts



Southwest elevation

Roost lost with number

Roost retained in situ with number

Southeast elevation

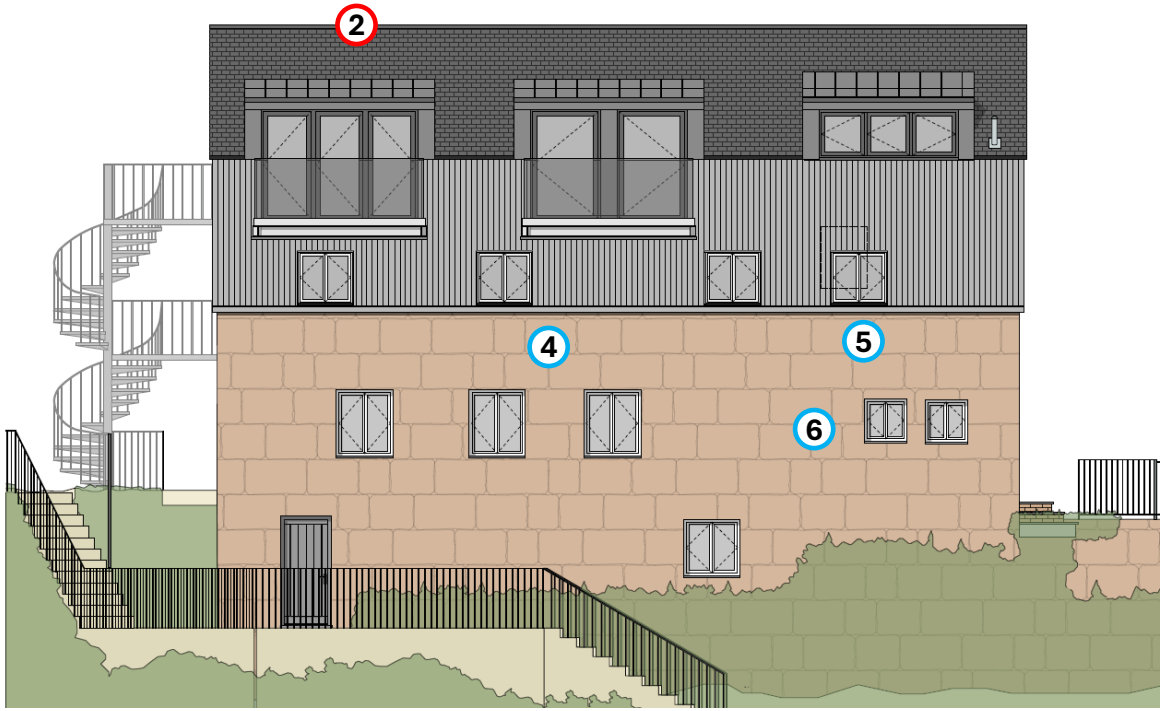
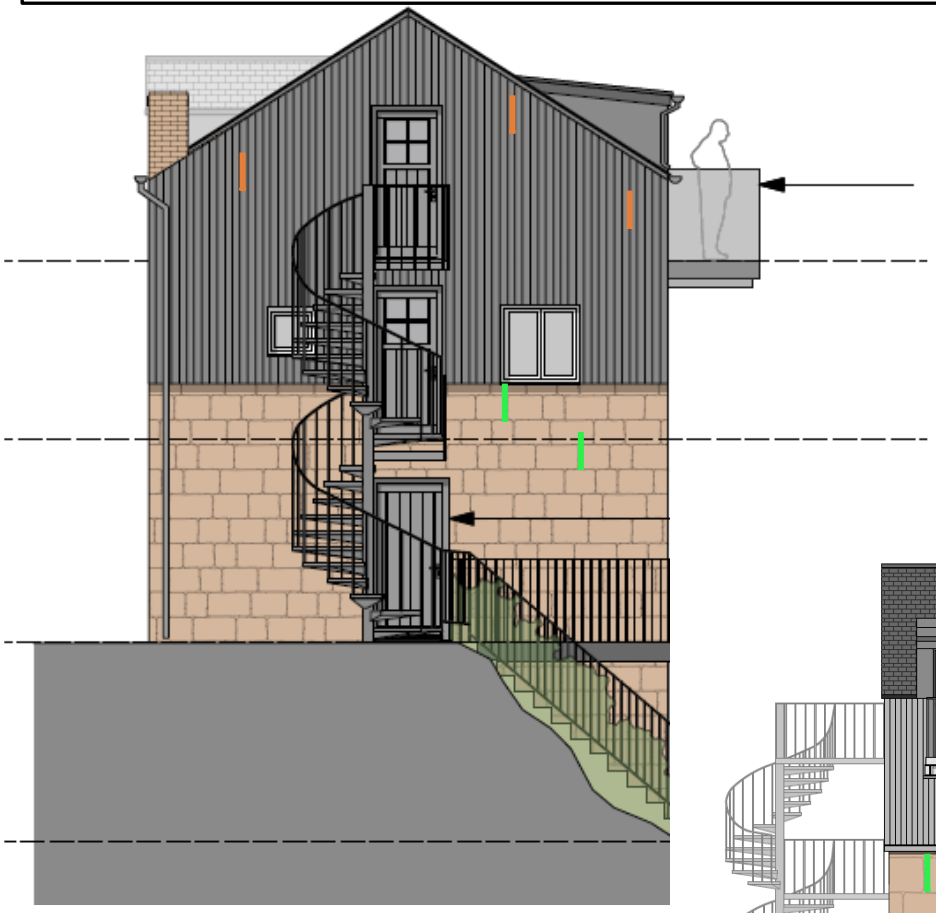


Figure 3a – Mitigation and Compensation: South-West and South-East Elevations



Southwest elevation

Roost retained in situ with number

Crevice features in sandstone blocks (x8)

Crevices between over lapping wooden cladding (x 3 per face)

Southeast elevation

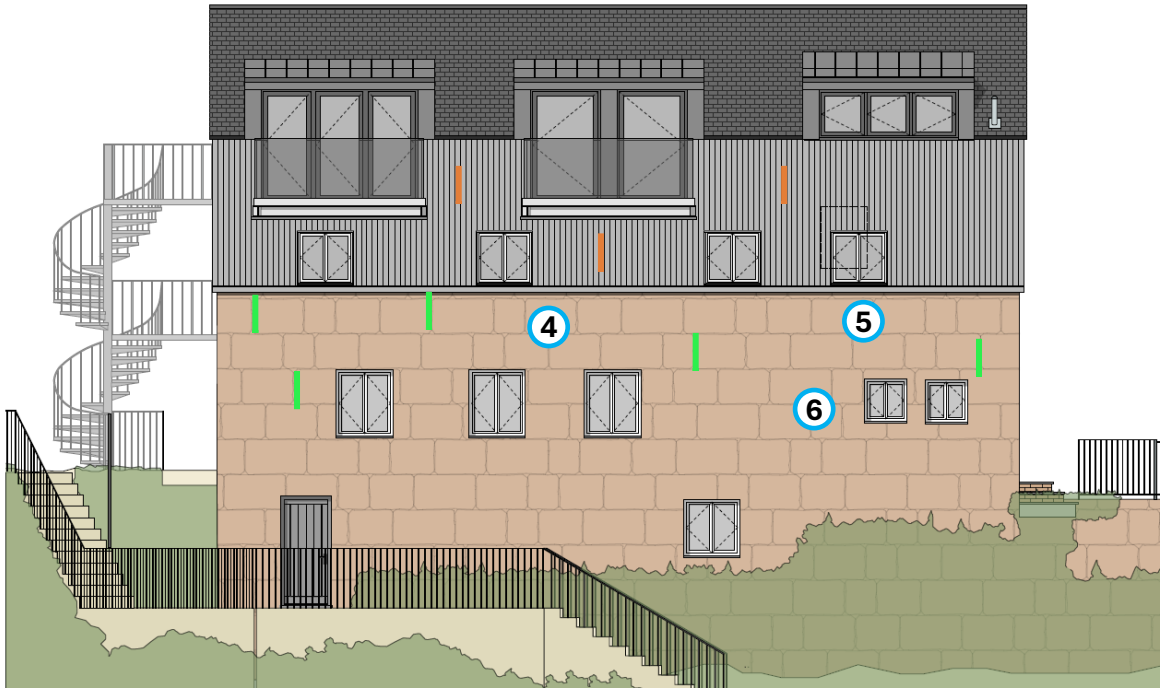


Figure 3b – Mitigation and Compensation: North-East and North-West Elevations



North east elevation

Roost retained in situ with number

Crevices between over lapping wooden cladding (x 3 per face)

6 x Swift Boxes

North west elevation

