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Great Crested Newt Non-Licenced Mitigation Plan

Survey site:

Ruabon Brickworks, Hafod Road, Ruabon, Wrexham LL14 6ET

Client:

ST Demolition and Groundwork Ltd

Report date:

13th May, 2026

Project:

This report is prepared to inform a planning application with Wrexham County Borough Council. This proposal can be described as Deconstruction of the buildings and grub up hard standing ground.

Planning Reference: unsubmitted.

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Industry Guidelines and Standards

This report has been written with due consideration to:

- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.

Proportionality

> The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate. The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) might in some cases be all that is necessary.
>
> (BS 42020, 2013)

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Ltd. was commissioned by ST Demolition and Groundwork Ltd to produce a Great Crested Newt (GCN) Non-Licenced Mitigation Plan (NLMP) for d*econstruction of the buildings and grub up hard standing ground at* Ruabon Brickworks, Hafod Road, Ruabon, Wrexham LL146ET (hereafter referred to as "the site").

The site has been subject to a previous ecological assessment, as follows:

- Preliminary Ecological Appraisal (PEA) (Arbtech Consulting Ltd, April 2026).

1.2 Project Description

The proposed works are described as d*econstruction of the buildings and grub up hard standing ground.*

1.3 Site Location

The site is located at National Grid Reference SJ 31129 46207 and has an area of approximately 4ha comprising five buildings, developed land; sealed surface, sparsely vegetated land, willow scrub, mixed scrub, bramble scrub and modified grassland. The site is situated ~1km east of the residential town of Johnstown, Wrexham. The town comprises of dense residential settlements with associated vegetated gardens. To the north of the site is dense woodland which connects to priority parkland, containing ponds designated for GCN, along the western boundary of the site and extending to the south. The land to the east of the site is parkland and agricultural land.

A site location plan is provided in **Appendix 1**.

1.4 Scope of This Report

This report provides the necessary detail required for works to lawfully proceed to include Reasonable Avoidance Measures for amphibians including GCN to be implemented throughout the proposed works.

2.0 Ecological Baseline Conditions Relevant to This Report

The ecological baseline conditions at the site of relevance to this GCN NLMP were determined as a result of the PEA undertaken in April 2026 (Arbtech Consulting Ltd).

2.1 Habitats Recorded on Site

Habitats recorded on the site include:

- Mixed scrub
- Developed land, sealed surface
- Sparsely vegetated land
- Line of trees
- Buildings
- Modified grassland
- Bramble scrub
- Willow scrub

A baseline conditions plan is included within **Appendix 2.**

2.2. Value to Great Crested Newts and Other Common Amphibians

EPSL and survey data

Records of GCN within 2km of the site is unknown without records from COFNOD.

Habitat suitability

No ponds are located on site. There are a total of 23 ponds within 500m, all of which are considered suitably connected to the site via parkland, scrub and woodland. It should be noted that ~25m to the west is Johnstown Newt Site (SAC) which is designated for populations of great crested newts. The closest pond is situated <100m west from the development area and has been assessed to be suboptimal for GCN.

The linear bramble scrub on site likely enables amphibians to commute along the length of the site. Scattered scrub on site also offers refuge and foraging opportunities. The parkland and woodland within the local landscape elevate the area for amphibians by providing a good quality abundance of foraging, commuting and shelter resources.

The site offers suboptimal habitat for GCN in the form of modified grassland, and areas of scrub. Although the site offers suboptimal habitat for GCN, the presence of high value habitat surrounding the site, and the close proximity of a designated site for GCN populations and a pond (P1) located ~25m from the southern boundary, the presence of commuting GCN cannot be discounted. However, the proposed development will not result in the loss of any shelter or breeding habitat for GCN and will largely impact buildings and areas of developed land sealed of no value for GCN.

2.3 Scope for Mitigation and Enhancement

The presence of GCN and other common amphibians on site and within the wider site curtilage cannot be discounted. Mitigation will be required during construction activity to ensure great crested newts and other common amphibians potentially present within the site are suitably protected. There is limited scope to enhance the site for amphibians as part of the current proposals, however hibernaculum are recommended to create new shelter/resting opportunities within the site as part of any future development proposals brought forward for the site.

3.0 Ecological Mitigation Plan

3.1. Mitigation

Mitigation prescriptions to reduce adverse impacts to existing ecological features and biodiversity as identified through previous ecological assessment are detailed in **Table 1** below.

Table 1: Mitigation Prescriptions

Mitigation	Specification
Obtain European Protected Species Licence	Not required - In the unlikely event that a GCN is recorded within the site during any construction works, all works will cease immediately, and an appropriate European Protected Species Licence will be obtained from Natural England before works can resume.
Ecological Clerk of Works	All works detailed below will be supervised by a GCN licensed (or appropriately accredited) ecologist acting as an Ecological Clerk of Works (ECoW). The ECoW will work alongside the Development Biodiversity Champion and all other site contractors to ensure that the mitigation and enhancement measures detailed below are implemented correctly and that any amphibians displaced during the works are removed and relocated unharmed. Once the ECoW confirms this has been achieved, development works can continue in the absence of the ECoW, whereby contact between the Development Biodiversity Champion and project ecologist can be maintained to resolve any ecological issues that may arise during works.

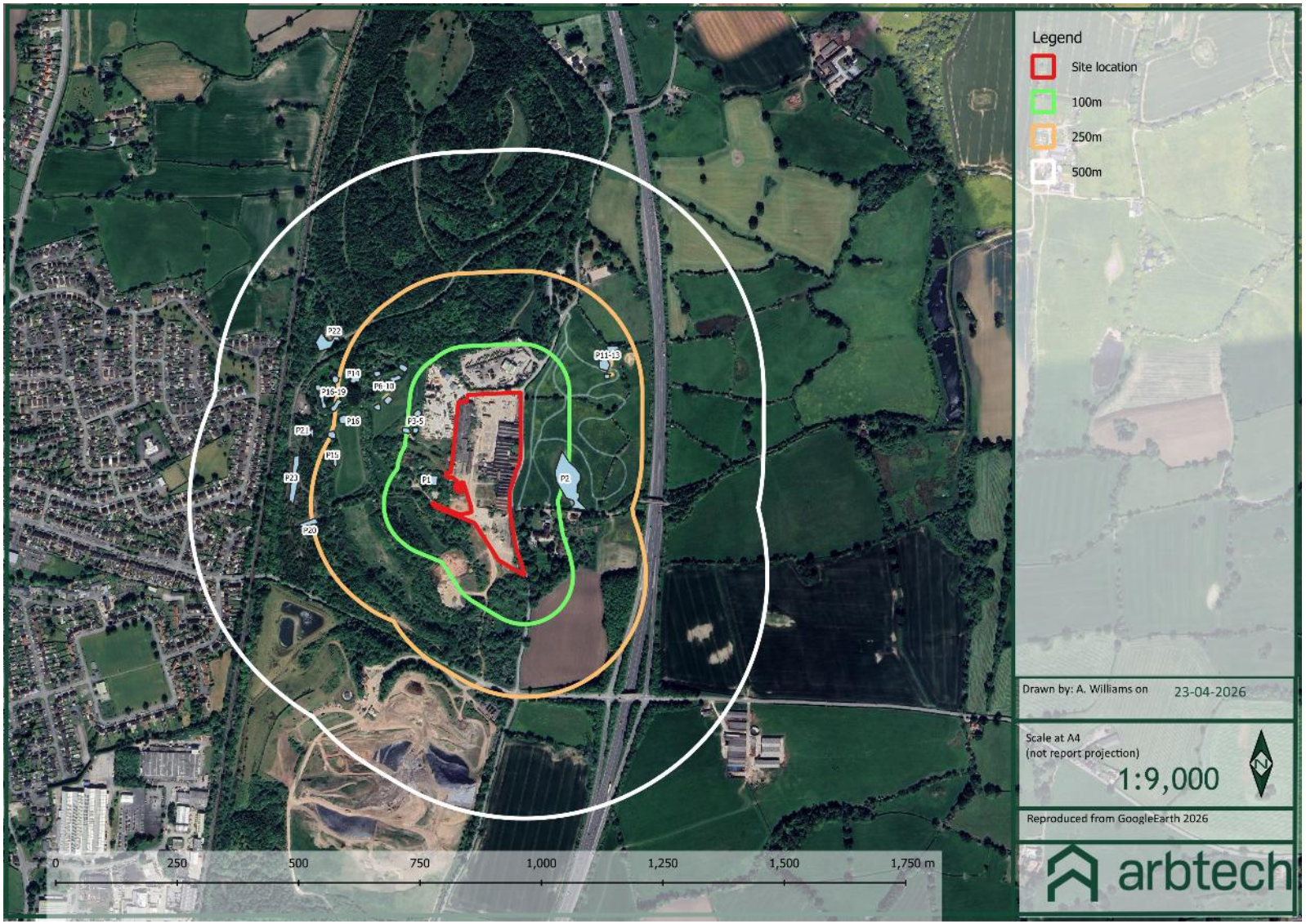
Persons responsible and lines of communication	**Overview** Effective communication between the site and project teams will need to be maintained to ensure mitigation and enhancement measures outlined within this GCN NLMP are adhered to. Should mitigation and enhancement measures not be implemented correctly, the anticipated protection of ecological features and gains to biodiversity as a result of the proposed development may not be achieved. **Mitigation** It is recommended that a Development Biodiversity Champion is selected for the construction phase of the development. The Biodiversity Champion should be someone with significant influence during construction, such as the contract or project manager. The Development Biodiversity Champion is responsible for ensuring all actions outlined in this GCN NLMP are implemented. Any queries with regards to the mitigation and enhancement prescriptions should be addressed to the project ecologist and communication should be retained between the Development Biodiversity Champion and project ecologist throughout the project. The project ecologist's contact details are located on the title page of this report. It is recommended that the Biodiversity Champion informs the project ecologist of the commencement of enhancement installation works and provides updates where necessary.
Reasonable Avoidance Measures (RAMS)	**Timing of Works** Works must commence outside of the hibernation period for amphibians, which is typically between November and February inclusive. Amphibians are mostly torpid during this timeframe and are thus most vulnerable to injury or death. Undertaking initial site clearance works during their active period, typically between March and September, will allow individuals to disperse unperturbed to adjacent retained habitats if disturbed. **Toolbox Talk** The ECoW will provide a toolbox talk to contractors on the first day of works, immediately prior to site preparation. The aims of the toolbox talk will be to highlight the potential presence of amphibians, outline indicators of their presence, highlight ID characteristics of each species, especially GCN, and to inform of protocol if an amphibian is encountered. **Finger-tip Search and Soft Strip** The vegetated land within the site and any areas of potential amphibian refugia (rubble piles) will be subject to a finger-tip search by the ECoW to check for any amphibians, followed by a supervised staged vegetation removal and soft strip by hand and using light plant machinery. Once the vegetation has been removed / reduced, the exposed substrate can be subject to light trampling or rolling. This will create compact bare ground of very little value to amphibians and will deter colonisation during development activity. **Displacement of Amphibians** In the unlikely event that a GCN is encountered during development activity, all works must stop and the project ecologist will be contacted for advice on how to lawfully proceed. If any other common amphibians are encountered during the works (such as common frog, common toad, and other

	common newt species), these should be moved carefully by hand by the Development Biodiversity Champion and placed within an area of dense vegetation offsite to the southwest. **Progression of Construction Without ECoW Supervision** Once the development area has been sensitively cleared of amphibian habitat, construction works can then progress. However, during this time it is expected that the Development Biodiversity Champion will remain vigilant and contact the project ecologists with any queries. **Removal of Debris and Storage of Building Materials** In order to prevent the creation of large debris piles resulting from development works that could in turn become suitable refuge hibernacula for amphibians, all debris will be stored over hardstanding or within a skip. Furthermore, the storage of building materials will be located over hardstanding or stored on pallets. **Prevent Trapping Amphibians During Works** Deep excavations may be required during construction activity. Deep excavations could trap amphibians and cause injury or death. All excavations will therefore either be suitably sealed overnight, or a ramp will be installed to enable any trapped animals to escape such as a piece of rough timber that is long enough to reach the base of the excavation from ground level. Should any trapped amphibians be found, the Development Biodiversity Champion should contact for project ecologist for advice on how to proceed.
Enhancements	The site will be enhanced for amphibians' post-development through creation of habitat piles from removed material from the development. These habitat piles should be created within the southern area of the site.
Evidence of compliance	Upon completion of the proposed works, the ECoW will provide written confirmation that works were undertaken in accordance with this report.

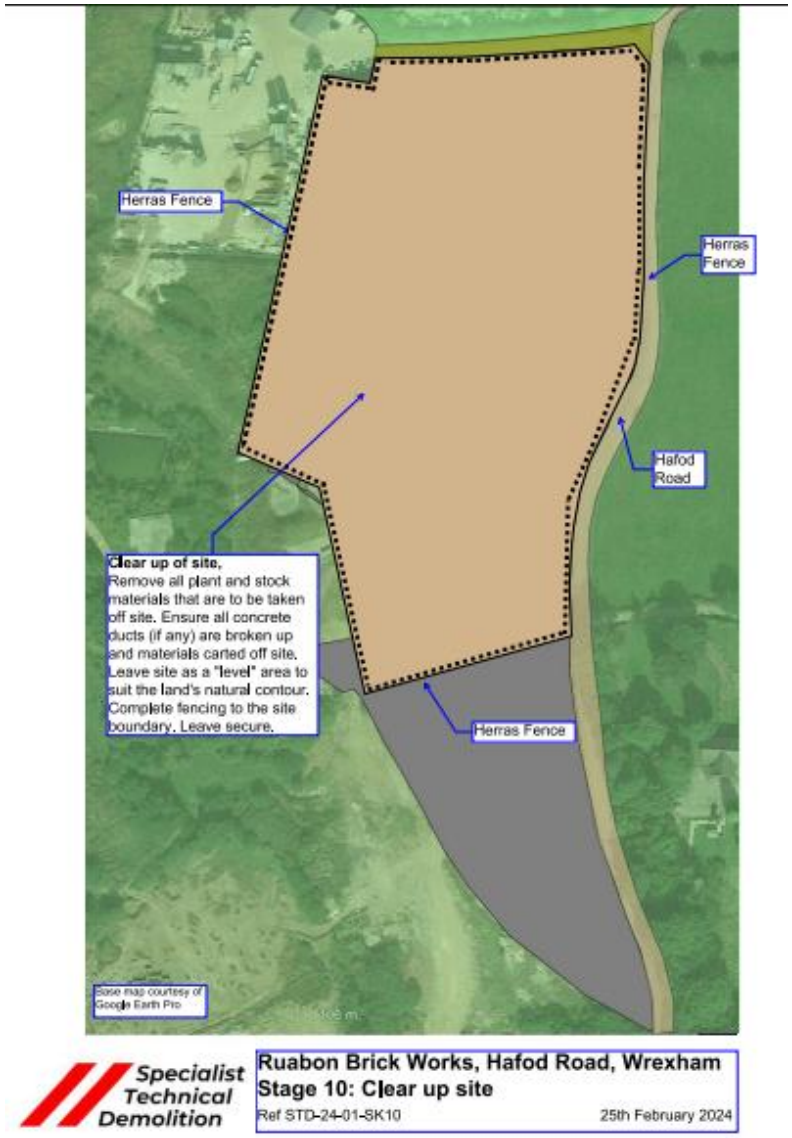
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- HMSO: The Conservation of Habitats and Species Regulations (2010) http://www.legislation.gov.uk/uksi/2010/490/contents/made
- National Planning Policy Framework. (2021). https://www.gov.uk/government/publications/national-planning-policy-framework--2
- Preliminary Ecological Appraisal and Preliminary Roost Assessment (Arbtech, 2026)

Appendix 1: Site and Pond Location Plan



Appendix 2: Proposed Plans



Version control			
Status	**Issue**	**Name**	**Date**
Draft	0.1	Kayleigh Davies BSc (Hons) MSc Consultant Ecologist	13/05/2026
Review	0.2	Leo Plevin BSc (Hons) MSc, MCIEEM Technical Manager (Ecology)	13/05/2026
Final	1.0	Kayleigh Davies BSc (Hons) MSc Consultant Ecologist	13/05/2026