RICHARDS

MOOREHEAD & LAING LTD

LANDSCAPE | ENVIRONMENT

Bodnant Avenue, Prestatyn

Preliminary Ecological Appraisal

For

May 2025 Updated September 2025

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QUALITY ASSURANCE PROCEDURES: Qp4, QP7.3Doc6

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Approved by:	Jon Stoddard	Date:	20/05/2025

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Executive Summary

Richards, Moorehead and Laing (RML) Ltd were commissioned by ADRA, to undertake a Preliminary Ecological Appraisal (PEA), on land adjacent to Bodnant Avenue, Prestatyn at central OS grid reference SJ 33490 50431. ADRA are proposing to develop the land as affordable housing comprising around 62 units and means of access subject to obtaining planning consent.

The site comprises of an agricultural field featuring a Public Right of Way (PRoW) that traverses the site from north to south. It is bounded by Bodnant Avenue, Ffordd Parc Bodnant, and Prestatyn Road to the north, Nant Hall Road to the south, and Nant Hall Touring Caravan Park to the east. The site encompasses an area of approximately 2.5 hectares.

The site was assessed using an Extended Phase 1 survey methodology, with a specific focus on its potential use by any protected and/or notable species. Furthermore, Habitat Suitability Index was carried out of a pond immediately next to the site, returning a score of average.

The surveys were required to identify potential ecological constraints of the proposals and to advise of any mitigation measures, further survey requirements and measures to avoid, reduce and minimise ecological effects, during the pre- and post-construction phases are recommended.

The proposed development has the potential to impact habitats of currently low to moderate ecological value. The potential loss of hedgerows and mature trees should be minimised to maintain connectivity with the wider landscape.

The site has the potential to support several protected and notable species including bats, and nesting birds. No bat roosts have been identified to date. No direct or indirect effects to statutory or non-statutory designated sites have been identified in this report. Detailed recommendations have been made in section 6 of this report.

While the development proposals are anticipated to result in minimal biodiversity losses, several enhancements are recommended for integration into the development proposals to deliver net gains for biodiversity

eDNA survey for the presence of great crested newts (GCN) was carried out on the 25th June 2025 on an adjacent pond outside the site boundary, the results were **negative for the presence of GCN** no further surveys have been recommended.

Several enhancements have been recommended to be integrated into the development proposals for the site to maximise biodiversity opportunities in accordance with Planning Policies Wales 12. These enhancements include the implementation and management of new landscape planting featuring native species, the installation of bat and bird boxes as well as hedgehog highways throughout the site.

The details in this report will remain valid for a period of 18 months from the date of this report (September 2026) after which if no site works have commenced, the validity of this assessment should be reviewed to determine whether further updates are necessary.

1 INTRODUCTION

1.1 Scope of commission

1.1.1 Richards, Moorehead and Laing Ltd (RML) were commissioned by ADRA to undertake a Preliminary Ecological Appraisal (PEA) survey report of a proposed development on land adjacent to Bodnant Avenue, Prestatyn at central OS grid reference SJ 33490 50431 (hereafter referred to as 'the site').

1.1.2 This report presents the findings of a preliminary ecological appraisal, Habitat Suitability Index (HSI) and provides an assessment of the potential effects on habitat and protected species which may result from the proposed development.

1.2 Site location and description

1.2.1 The site comprises an agricultural field featuring a Public Right of Way (PRoW) that traverses the site from north to south. It is bounded by Bodnant Avenue, Ffordd Parc Bodnant, and Prestatyn Road to the north, Nant Hall Road to the south, and Nant Mill Touring Caravan Park to the east. The site encompasses an area of approximately 2.5 hectares.

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

1.3 Scheme proposal

1.3.1 Adra have agreed terms of purchase of the land at Bodnant Avenue, Prestatyn.

1.3.2 At the time of writing, the scheme comprises 62 affordable dwellings.

1.3.3 The land at present is one open field which is laid to grass. There are trees at the southern edge of the site which are subject to a 1950 Tree Preservation Order (TPO).

1.3.4 The proposed site masterplan (at the time of writing) is shown in **Appendix B**. The proposed development which fronts onto Bodnant Avenue would involve the following:

- Construction of a new site access.
- Affordable dwellings and associated parking and infrastructure.
- Active travel routes.
- Amenity and public open space.
- SuDS including swales.
- Boundary fencing, and a
- New sub station

1.4 Survey and report objectives

1.4.1 This report presents the methodology and results of a desk study, and habitat appraisal, as well as making initial recommendations for potential mitigation and enhancement measures to inform a future application for planning permission for the site.

1.4.2 The aims of the survey and report are to:

a) Provide the results of the Preliminary Ecological Appraisal (PEA) survey carried out by RML on the 20th August 2024 of the proposed works footprint and adjacent habitats located at the site.

b) An assessment of the habitats present, the potential for these to support protected species and the likely impacts due to construction at the site.

c) to establish whether any areas of potential bat habitat support bats, and what species are present on site.

d) to establish whether any areas of potential reptile habitat support reptiles, and what species are present on site.

e) Identify any further survey requirements.

f) Identify appropriate enhancement measures including mitigation and,

g) Highlight the potential requirement for protected species licensing.

1.5 Consultations and meetings

1.5.1 A pre-application consultation (DCC Ref 43/2023/0751) has been sought with Denbighshire County Council (DCC) and a response received on 22nd January 2024. The response identified a number of constraints on the site that included the following factors :-

- The site is of Grade 1 quality under the Predictive Agricultural Land Classification (2019). This is classed as Best and Most Versatile agricultural land.
- There is a significant Tree Preservation Order along the southern boundary to the site.
- The site lies within the Prestatyn Castle Mound and Nant Hill Conservation Area (see plan extract below of Conservation Area).
- The site is in close proximity to the Prestatyn Castle Scheduled Ancient Monument.
- A Public Right of Way crosses the site.

- A section of the site to the northern boundary adjoining Prestatyn Road is subject to flood risk

1.5.2 An arboricultural survey was undertaken in accordance with BS 5837 by ROAVR in September 2024 and subsequently updated by Arbtech in November 2024 to verify the extent of the Root Protection Area (RPA) of the trees along Nant Hall Road protected by a TPO.

1.5.3 A site visit was held with the Local Planning Authorities' Tree Officer and Ecologist on Monday 3rd March 2025 to agree the extent of the RPA.

1.5.4 Regular Design Team Meetings (DTM) have been held. These included discussions regarding constraints in respect of bats (and other species) and to advise of measures to avoid and minimise any negative effects to bats and appropriate mitigation and or enhancement measures which can be incorporated into the final design.

1.6 Personnel and quality assurance

1.6.1 This report has been written by Katy Morris reviewed by Robert Jones) and approved by Jon Stoddard. The report is issued by RML Ltd. The surveys were led by Katy Morris and assisted by Rhodri Edwards and Dr Adam Lynch.

1.6.2 Ecologist Katy Morris is an Associate member of CIEEM. Katy has a BSc in Environmental Science from Liverpool John Moores University. She has a keen interest in bats. Katy has experience of surveying bats, dormice, otters, water vole, reptiles, and great crested newts. She is also proficient in Phase 1 habitat surveys and is extending her repertoire to include invertebrates, NVC habitat surveys, Green Infrastructure Statement, Habitat Regulation Assessment, QGIS and Qfield. Katy is currently involved in numerous voluntary bat activities, including roost monitoring, bat care and handling working towards her own survey licence and accredited on Donna Hall survey licence) bat licensed # S091777-2 . Katy has completed the Certificate of Bat Acoustics Analysis (CoBAA) and has achieved Technician Level: Graded B Assessment Result.

1.6.3 Robert Jones is an associate member of CIEEM and has been involved in ecology work for over 14 years and holds NRW licences for dormice and GCN. Rob has been involved in surveying, mitigating for and the monitoring of various protected species on major/trunk road improvement schemes throughout Wales (eg. M4, A487, etc) including bats, badgers, dormouse, reptiles and great crested newts. He also has extensive experience being the Ecological Clerk of Works for a variety of schemes.

1.6.4 Assistance for the bat surveys were provided by experience surveyors Rhodri Edwards and Dr Adam Lynch

2 LEGISLATION AND PLANNING POLICIES

2.1 Habitats and Species

2.1.1 Certain habitats and species are subject to protection as laid out in the Wildlife and Countryside Act (as amended) [1] and/or the Conservation of Habitat and Species Regulations 2017 (the 2017 Regulations) as amended[2] or by their own separate protection, for example, the Badgers Act 1991[3]. Wild birds are supported by Regulation 10 of the 2017 Regulations which require local authorities and others to take steps to contribute to the diversity and extent of habitat for wild birds.

2.1.2 For a summary of the offences under this legislation refer to **Appendix C**.

2.2 Environment (Wales) Act 2016[4]

2.2.1 Welsh legislation confirms Wales' legal commitment to biodiversity conservation. Section 6 of the Environment (Wales) Act 2016 introduced an "enhanced biodiversity and resilience of ecosystems duty (the S6 duty)" for public authorities, which requires that they "seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems".

2.3 Planning Policy Wales (PPW12) [5]

2.3.1 Planning Policy Wales 12 (PPW12) Section 6.4.3 sets out the responsibilities of the Local Planning Authority when assessing development proposals and their impacts on biodiversity. This document states:

'The planning system has a key role to play in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement'.

2.3.2 It sets out the requirement for planning authorities to demonstrate that they have sought to fulfil the duties and requirements of Section 6 of the Environment (Wales) Act 2016 by taking all reasonable steps to maintain and enhance biodiversity in the exercise of their functions.

2.4 Biodiversity Policy and Net Benefits for Biodiversity

2.4.1 Wales Biodiversity Partnership (WDP) have produced biodiversity checklists for local authority and public authority staff in Wales. The checklists will assist public and local

[1] https://www.legislation.gov.uk/ukpga/1981/69
[2] https://www.legislation.gov.uk/uksi/2017/1012/contents/made
[3] https://www.legislation.gov.uk/ukpga/1991/36/enacted
[4] https://www.legislation.gov.uk/anaw/2016/3/contents/enacted
[5] https://www.gov.wales/sites/default/files/publications/2024-02/planning-policy-wales-edition-12_1.pdf

authorities to take account of biodiversity in their operational activities and will help organisations to remain legal under the Environment (Wales) Act 2016 Biodiversity Duty and other biodiversity related legislation. In addition, the implementation of the checklists and guidance will help build towards the biodiversity outcomes contained in the Environment Strategy for Wales.

2.4.2 The net-benefits for biodiversity approach by Welsh Government has the intention to deliver an overall improvement in biodiversity by putting an emphasis on proactive consideration of biodiversity and wider ecosystem benefits within a placemaking context to be considered early in the design process. The aim is to design schemes that positively impact ecosystem resilience. Natural Resources Wales (NRW) has developed a framework for evaluating ecosystem resilience based on five attributes and properties specified in the Environment (Wales) Act 2016. This is referred to as DECCA: Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience[6].

[6] Garrett HM, and Ayling SC. 2021.Terrestrial and freshwater Resilient Ecological Networks: a guide for practitioners in Wales. 43 pp. NRW Report No. 483 Natural Resources Wales. Dolgellau

3 METHODOLGY

3.1 Desk Study

3.1.1 Third party consultation was undertaken as part of the proposal. Data was requested from Cofnod, the Local Environmental Records Centre for North Wales on 12th August 2024 to obtain the following ecological data:

- Details of any statutory and non-statutory nature conservation designations within 10 km of the site.
- Records of any legally protected or other notable species within 2 km of the site; and
- SSSIs and Special Areas of Conservation (SACs), with bats as a qualifying feature, within 10km of the site.

3.1.2 A copy of the public records available from Cofnod are provided in **Appendix D**.

3.1.3 Open source 1:25,000 Ordnance Survey mapping and Google Earth Pro satellite imagery were used to identify any mapped water bodies and watercourses within 500 m of the Site and to assess habitat connectivity.

3.2 Field Survey

Extended phase 1 habitat survey

3.2.1 An Extended Phase 1 habitat survey was conducted on the 20th August 2024 by Katy Morris of RML to determine the current baseline conditions of the site. The survey area included all land affected by the proposals and immediate adjacent land, where accessible. The weather conditions during the survey were, calm and dry with an ambient temperature of 19°C.

3.2.2 Habitats were described and mapped following the standard Phase 1 habitat survey methodology (JNCC, 2010). Phase 1 habitat survey is a standard technique for classifying and mapping British habitats. The dominant plant species were recorded, and habitats were classified according to their vegetation types. Where appropriate, consideration was given to whether habitats qualify, or could qualify, as a Habitats of Principal Importance following habitat descriptions published by the Joint Nature Conservation Committee (JNCC, 2008). The Phase 1 survey method is 'extended' through the additional recording of specific features indicating the presence, or likely presence of, protected species or other species of nature conservation significance (also referred to as 'notable' species).

3.2.3 The scientific naming of plant species follows those in Stace (2010). Habitats were marked on a paper base map and were subsequently digitised using a Geographical Information System (QGIS). Target notes (TN) were made to provide information on specific features of ecological interest or habitat features too small to be mapped. These are shown and described in **Appendix E**.

3.2.4 Any invasive plant species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) recorded during the Phase 1 habitat survey was also target noted. Detailed mapping of such species; or a full survey of the site for all invasive plant species is beyond the scope of this commission.

Protected Species Assessment

3.2.5 Any evidence, or potential for protected species and notable species were recorded and, where appropriate, marked as a target note on the Phase 1 habitat plan. The assessment of habitat suitability for protected and notable species was based on professional experience and judgement and supplemented by standard sources of guidance on habitat suitability assessment for key faunal groups. This modified approach to Phase 1 habitat survey is in accordance with the approach recommended by Guidelines for Preliminary Ecological Appraisal (CIEEM, 2017[7]).

3.2.6 Bat surveys and assessment are reported separately[8].

3.3 Habitat Suitability Index (HSI)

3.3.1 One pond was assessed using the Habitat Suitability Index (HSI) survey in the field and then by desk study (for pond density via OS mapping and aerial imagery) using the methodology developed by Oldham et al. (2000). The survey was conducted on the 20th August 2024 by one surveyor.

3.3.2 The HSI assessment follows a standardised assessment process using habitat components such as water quality, fish and/or waterfowl presence, and surrounding terrestrial habitat quality to derive a suitability score or 'index'. Water bodies with high scores are considered more likely to support great crested newts (GCNs) than those with lower scores. HSI scores and the inferred suitability of the ponds to support GCN are listed in **Table 1.**

[7] https://cieem.net/wp-content/uploads/2018/01/Guidelines-for-Preliminary-Ecological-Appraisal-Jan2018-typo-edit.pdf

[8] Morris.K; 2025; *Bat Survey and Report*; Richards Moorehead and Laing

Table 1 *HSI Score*

HSI Score	Habitat Suitability
<0.50	Poor suitability
0.50 – 0.59	Below average suitability
0.60 - 0.69	Average suitability
0.70– 0.79	Good suitability
> 0.80	Excellent suitability

3.4 eDNA Sampling

3.4.1 Samples were collected by RML surveyors accredited on license number S0955024/1 Robert Jones. The samples were collected on the 25th June 2025. These results informed whether subsequent further presence /absence surveys (torching and bottle trapping) were required based on Natural Resources Wales (NRW) guidance [9].

3.4.2 The protocol for eDNA sampling followed that outlined within the technical advice note[10] for field and laboratory sampling of great crested newts which required the collection of 20 x 30 ml subsamples from the pond, spaced as evenly as possible around the pond margin where access was possible.

3.4.3 Once collected, the samples were sent to SureScreen Scientifics Ltd for analysis.

3.4.4 NRW guidance accepts the use of eDNA surveys as evidence of presence or absence of great crested newts, provided samples are taken when newts are likely to be present. Natural Resources Wales will only accept eDNA survey results undertaken between mid-April and 30th June[11].

3.4.5 Any presence of other amphibians within the ponds was also recorded.

3.5 Survey Constraints and Limitations

3.5.1 The habitat surveys were undertaken at an optimal time of year and were unhampered by access restrictions. The results are therefore considered appropriately robust.

3.5.2 Records held by local ecological record centres, local recording groups and on the internet are often collected on a voluntary basis; therefore, the absence of records does not demonstrate the absence of species, rather, it may simply indicate a gap in recording coverage.

3.5.3 As the behaviour of wild animals is unpredictable and can change over time, the results of the survey reflect site conditions on the dates of surveys.

[9] https://naturalresources.wales/media/3509/guidance-on-use-of-dna-sampling-of-great-crested-newts.pdf
[10] https://www.thebhs.org/publications/the-herpetological-journal/volume-10-number-4-october-2000/1617-03-evaluating-the-suitability-of-habitat-for-the-great-crested-newt-triturus-cristatus/file
[11] NB: This guidance is currently under review; however, it remains the current published guidance at the time of the surveys and reporting.

4 BASLINE ECOLOGICAL CONDITIONS

4.1 Desk study

4.1.1 The following section summarises the results of the desk study and field surveys. A copy of the public records available from Cofnod is provided in **Appendix D**.

Statutory designated sites

4.1.2 There are nine statutory designated sites: one Ramsar, two Special Protection Area (SPA) and four Site of Special Scientific Interest (SSSI), one Local Nature Reserve (LNR), and one Area of Outstanding Natural Beauty (AONB), located within 2 km of the site. These are detailed in **Table 2.**

Table 2: *Statutory Designated sites with 2km of the site.*

Site name	Distance from site	Reason for notification (as taken form site citations)
UK11082 Dee Estuary (Wales)[12] (Ramsar)	420 m northeast.	This SSSI supports a range of sand dune habitats and associated flora and fauna including many rare and uncommon plant and animal species as well as shingle, swamp and saltmarsh habitats. This contiguous piece of sand dune habitat, wide sandy foreshore and its associated habitats adds to the wetland interest already found within the existing site. Both natterjack toad and sand lizard have been reintroduced to this dune system in recent years and are both now well established. The site also supports the only breeding population of little tern in Wales and the shingle feature used by the breeding terns also provides a high tide overwintering roost location for the Dee Estuary waterfowl populations.
Dee Estuary / Aber Afon Dyferdwy (SSSI)	420 m northeast.	The Dee Estuary/Aber Afon Dyfrdwy is of special interest for its total populations of internationally important wintering waterfowl, its populations of individual waterfowl and tern species. The Dee Estuary/Aber Afon Dyfrdwy is also an important staging post for migrating birds during both spring and autumn.
Prestatyn Hillside (SSSI)	900 m south	A steep west-facing hillside on Carboniferous limestone at the northern end of the Vale of Clwyd. The glacial drift of the site supports a range of semi-natural plant communities including calcareous and acidic grassland, calcareous heath and scrub and broadleaved woodland. Limestone outcrops and disused quarries also occur.
Gronant Dunes and Talacre Warren (SSSI)	920 m northeast	Gronant Dunes and Talacre Warren has special interest for botanical, entomological and ornithological reasons.

[12] https://jncc.gov.uk/jncc-assets/RIS/UK11082.pdf

Site name	Distance from site	Reason for notification (as taken form site citations)
Teilia Quarry (SSSI)	1060 m south	Geological interest. Teilia Quarry SSSI has one special feature: • Palaeozoic plant fossils found in rocks exposed in a disused quarry. This is the only known locality for the distinctive Upper Black Limestone flora (late Dinantian). It has yielded twenty recognisable species, mostly pteridosperms and progymnesperms, three of which are unique to the locality.
UK9013011 Dee Estuary / Aber Afon Dyferdwy (SPA)[13]	420 m northeast.	Qualifying Features: A048 *Tadorna tadorna;* Common shelduck (non-breeding) A052 *Anas crecca*; Eurasian teal (non-breeding) A054 *Anas acuta*; Northern pintail (non-breeding) A130 *Haematopus ostralegus*; Eurasian oystercatcher (non-breeding) A141 *Pluvialis squatarola;* Grey plover (non-breeding) A143 *Calidris canutus;* Red knot (non-breeding) A149 *Calidris alpina alpina;* Dunlin (Non-breeding) A156 *Limosa limosa islandica*; Black-tailed godwit (non-breeding) A157 *Limosa lapponica*; Bar-tailed godwit (non-breeding) A160 *Numenius arquata*; Eurasian curlew (non-breeding) A162 *Tringa totanus*; Common redshank (non-breeding) A191 *Sterna sandvicensis*; Sandwich tern (non-breeding) A193 *Sterna hirundo*; Common tern (Breeding) A195 *Sterna albifrons*; Little tern (Breeding) Waterbird assemblage
UK9020294 Liverpool Bay / Bae Lerpwl SPA	990 m north	Qualifying Features: A001 *Gavia stellata*; Red-throated diver (non-breeding) A065 *Melanitta nigra*; Common scoter (non-breeding) A177 *Hydrocoloeus minutus;* Little gull (non-breeding) A193 *Sterna hirundo*; Common tern (Breeding) A195 *Sternula albifrons*; Little tern (Breeding) Waterbird assemblage
Gronant Dunes (LNR)	895 m north	Little Terns are not the only protected species that make their home here, others occur in the dunes including Sand Lizards and Natterjack Toads.
Clwydain Range and Dee Valley / Bryniau Clwyd a Dyffryn Dyfrdwy (AONB)	470 m southeast	AONB is a designated part of our landscape whose distinctive character, beauty, and cultural heritage are so precious that it is safeguarded in the national interest.

[13] https://publications.naturalengland.org.uk/publication/6557770283220992

Non-statutory designated sites

4.1.3 There are seven Local Wildlife Site (WS) located within 2 km of the site; these are detailed in **Table 3** below.

Table 3: Non statutory designated sites within 2 km.

Site name	Distance from site	Reason for notification
Prestatyn Golf Links (WS)	470 m north	This site includes roughs within the golf course, which is immediately behind a coastal sand dune SSSI. The grassland is dominated by golden oatgrass (*Trisetum flavescens*), common bent, (*Agrostis capillaris*), red fescue (*Festuca rubra*)and ribwort plantain (*Plantago lanceolata*) with frequent Bird's-foot-trefoil (*Lotus corniculatus*), common restharrow (*Ononis repens*), Sand Sedge (*Carex arenaria*) and creeping cinquefoil (*Potentilla reptans*). A drainage ditch runs through the site, but it is regularly cleared for flood defence. There are areas of reedbed in the centre of the site and wet ditches. This site supports large numbers of breeding sedge warbler (*Acrocephalus schoenobaenus*)and occasional reed bunting (*Emberiza schoeniclus)* and grasshopper warbler (*Locustella naevia*).
Top Y Nant Woods (WS)	690 m southeast	This is a small broadleaved woodland on the steep north-west facing slopes of a limestone hill that overlooks Prestatyn. The woodland canopy is dominated by hawthorn (*Crataegus monogyna*) with ash (*Fraxinus excelsior*), sycamore (*Acer pseudoplatanus*), beech (*Fagus sylvatica*), and yew (*Taxus baccata*) scattered throughout. There is a well-developed shrub layer too.
Y Morfa(WS)	820 m west	This is a flood plain grazing marsh with open ditches of floristic interest and standing open water in winter. There are discrete patches of scrub, some crack willow (*Salix viminalis*) and a small area of fen. The site supports significant areas of snipe (*Gallinago gallinago*) in winter with peak counts of over 100 birds recorded.
The Dingle(WS)	870 m east	This site is a broadleaved woodland in a steep sided stream valley on the hillside north-east of Prestatyn.
Coed Bell(WS)	1200 m east	An oak woodland, carpeted with bluebells (*Hyacinthoides sp*), on a north facing slope near the coast.
Y Ffrith(WS)	1700 m northwest	*No information found.*

Site name	Distance from site	Reason for notification
Home and Stoney Woods	1900 m southeast	*No information found.*

4.1.4 There are nine areas of ancient woodland (either ancient semi-natural, plantation or restored) within 2 km of the site. The closest lies 930 m to the southeast of the Site.

4.1.5 There are two notable trees within 2 km of the site which are listed on the Ancient Tree Inventory[14]. One tree is 1.3 km northeast, and the other is 1.2 km northwest.

4.1.6 Plans showing the location of statutory and non-statutory designation sites are provided in **Appendix F.**

Habitat

4.1.7 The following habitat records were returned for the site (within the last 10 years) by Cofnod (JNCC alphanumeric codes in parentheses).

- Improved Grassland (B4)

Protected and notable species

4.1.8 The following section presents the findings of the desk study (species records within 2 km of the site within the last 10 years) from Cofnod.

Amphibians

4.1.9 There were 50 records of amphibians within 2km of the site in the last ten years. The majority of the records are associated with the Gronant Dunes LNR. The closest record to the site was for a palmate newt (*Lissotriton helveticus*) 392m north in 2018. Other species of amphibians recorded are:

- Common frog (*Rana temporaria*) 556m south in 2019.
- Common toad (*Bufo bufo*) 1789 m northeast in 2023.
- Natterjack toad (*Epidalea calamita*) 1847 m northeast in 2017.
- Smooth newt (*Lissotriton vulgaris*) 1934 m northeast in 2014.

Badger

4.1.10 There were 22 records of badger (*meles meles*), the nearest record was for a dead badger on the road 366 m northeast of the site. No badgers have been identified on site; the nearest sett is 540 m southeast of the site, the record was for *'hair and latrine observed; Likely to be a main sett, under the concrete slab on which a small DCWW building sits'.*

[14] https://ati.woodlandtrust.org.uk/

Bats

4.1.11 There were 17 records for bats returned within 2 km of the site, no bat species have been identified on site; the nearest records are:

- Common pipistrelle (*Pipistrellus pipistrellus*) 542m northwest emerging from the building.
- Myotis sp (*Myotis*) 574 m west in 2014
- Noctule (*Nyctalus noctule*) 583 m east in 2023.
- Soprano pipistrelle (*Pipistrellus pygmaeus*) 583 m east in 2023.
- Lesser horseshoe (*Rhipolophus hipposideros*) 33 bats counted over a period of 30 years during winter hibernation 1622 m south.

Birds

4.1.12 There were 1303 records of birds within 2km of the site, the only record within the site was for a rook (*Corvus frugilegus*) ~38 nests in 2022.

Hedgehog

4.1.13 There were 60 records of hedgehogs, no records were returned for the site, the nearest record was 170m south which included live sightings and a hedgehog dead on the road.

Invertebrates

4.1.14 There were 189 records for invertebrates within 2km of the site, no records within the site, the nearest record to site was for a dingy skipper (*Erynnis tages*) 299m north.

Otter

4.1.15 There was one record of an otter which was 1716 m northwest of the site in 2023 swimming alongside the walkway.

Reptiles

4.1.16 There were 238 records of reptiles within 2 km of the site, the majority of the records are associated with Gronant Dunes LNR. The nearest reptile record to site was for a common lizard (*Zootoca vivipara*). The nearest sand lizard (*Lacerta agilis*) record is 940m north from 2015.

4.2 Field study

Habitats

4.2.1 The surveyed site area comprises of an agricultural field (**Photographs 1 & 2**), characterised by extensive improved grassland, with areas of tall ruderal vegetation, plantation woodland and hedgerows. The site is bounded to the east by a caravan park, by Bodnant Avenue to the north and west, and Nant Hall Road to the south.

4.2.2 The main habitats recorded within the surveyed area are described in the following paragraphs. The location and extent of habitats present and Target Notes (TN), are shown on the Phase 1 Plan in **Appendix E**. Photographs of key habitat features, where appropriate, are provided in **Appendix G**).

Scattered broad leaved tree (A3.1)

4.2.3 There are two mature beech (*Fagus sylvatica*) trees which are notable within hedgerow (HR2) to the east of the site **(Photograph 3)**. There is a line of sycamore (*Acer pseudoplatanus*) trees which follows the hedgerow (HR1) (**Photograph 4**) boundary along Bodnant Avenue. None of the trees were highlighted as having Tree Protection Orders (TPOs)[15] and none are listed on the Ancient Tree Inventory[16].

Mixed plantation woodland (A1.3.2)

4.2.4 This habitat type (**Photograph 5**) is found along the southern boundary with Nant Hall Road and is covered by a blanket TPO. Species comprised ash (*Fraxinus excelsior*) hawthorn (*Crataegus monogyna*), sycamore, beech, Turkey oak (*Quercus cerris*) and pine trees including Scots pine (*Pinus sylvestris*).

Improved grassland (B4)

Improved grassland is the predominant habitat on the site (**Photograph 6**). This habitat is characterized by a mix of plant species, including creeping thistle (*Cirsium arvense*), cock's-foot (*Dactylis glomerata*), perennial ryegrass (*Lolium perenne*), dock (*Rumex sp.*), and common knapweed (*Centaurea nigra*). Other species present include yarrow (*Achillea millefolium*), dandelion (*Taraxacum sp.*), and ribwort plantain (*Plantago lanceolata*).

Dense/continuous scrub (A2.1)

4.2.5 Dense scrub was present, dominated by bramble (*Rubus fruticosus)* to the southeast and northeast corners of the site.

[15] https://maps.denbighshire.gov.uk/MyDenbighshire.aspx?mapsources=AllMaps&Layers=tpo&tab=1
[16] https://ati.woodlandtrust.org.uk/

Tall ruderal

4.2.6 Tall ruderal species were associated with the hedgerows and along the dense scrub in the southeast corner of the field. Species included scattered dock (*Rumex sp),* common knapweed, creeping thistle, and common nettle (*Urtica dioica).*

Intact species-poor hedge (J2.1.2)

Hedgerows are present along the Bodnant Avenue boundary (**Photograph 7**) and the eastern site boundary adjacent to the caravan park (**Photograph 8**). These hedges are primarily composed of hawthorn, with occasional ash (*Fraxinus excelsior*), dog rose (*Rosa canina*), and elder (*Sambucus nigra*). Occasional mature beech and sycamore trees are also present within the hedgerows.

Building (J3.6)

4.2.7 A small electric substation (**see Photograph 9**) is located in the southeast corner of the site, near the public footpath and kissing gate that leads to Nant Hall Road. This building has a moderate potential for roosting bats due to some slipped, missing, and lifted tiles on both the north and south sides of the roof. The brickwork pointing is in good condition, with no missing sections, and there are no gaps beneath the fascia boards.

4.3 Hedgerow Regulation Assessment

Table 4 Hedgerow Assessment HR1 and HR2

Criteria description[17]	HR1	HR2
The hedge has existed for 30 years or more	No	Potentially
The hedgerow contains protected or otherwise notable species[18]	None highlighted though likely to contain habitat for nesting birds and small mammals. Bats recorded close by are likely to use the hedgerows for foraging and commuting.	Yes. Bats recorded foraging and commuting along the hedgerow. Likely to contain habitat for nesting birds and small mammals.
The hedgerow includes:		
at least 7 woody species/30 m	No	No

[17] Please refer to the Hedgerow Regulations for the full explanation http://www.legislation.gov.uk/uksi/1997/1160/contents/made, this is a summary

[18] Presence of protected animal and plant species within the last 5 years as identified from the Cofnod data and surveys conducted in 2019 and 2020.

Criteria description[17]	HR1	HR2
at least 6 woody species/30m and at least 3 features (refer to the key for a list of features)	No	No
at least 6 woody species/30m, including one of the following— black-poplar tree (*Populus nigra* ssp *betulifolia*); large-leaved lime (*Tilia platyphyllos*); small-leaved lime (*Tilia cordata*); wild service-tree (*Sorbus torminalis*)	No	No
at least 5 woody species and has associated with it at least 4 features.	No	No

Key
Features:
• Bank/wall: The hedgerow is supported along at least half of its length by a bank/wall
• Intact: The hedgerow contains less than 10% gaps in total along its length
• Trees: The hedgerow supports at least 1 standard tree per 50 m length
• 3 flora spp.[19]:The hedgerow supports at least 3 of the valuable ground flora species defined by the Regulations.
• Ditch: There is a ditch along at least half of the length of the hedgerow
• Connections ≥4 points: A hedgerow must score 4 or more 'connection points' where connections with an adjoining hedgerow(s) score 1 point each, and a connection with a pond or woodland (in which the majority of the trees are broad-leaved) scores 2 points each. A hedgerow is considered to be connected if it meets the feature, or if it has a point within 10 m of it and would meet it if the line of the hedgerow continued
• Parallel hedge: A parallel hedgerow is present within 15 m

[19] Valuable ground flora species within the Hedgerow Regulations (1997)

4.4 Priority habitats

4.4.1 **Table 5** lists the habitats found within the surveyed area and whether these habitats are listed as Priority Habitats in Section 7 of the Environment (Wales) Act 2016[20] .

Table 5 Summary of Priority Habitats

Habitat Ref	Habitat Description	Priority Habitat	Site Context/Justification
A3.2	Mixed plantation	x	The southern boundary is a mixed plantation woodland, these trees are covered by a blanket TPO
A3.1	Scattered broadleaved trees	x	Broad-leaved trees were notable within the hedgerow HR2 to the east of the site.
A2.1	Dense/continuous scrub	x	Dense scrub is present on site associated with the hedgerow along the eastern boundary.
B4	Improved grassland	x	The majority of the land surveyed is improved neutral grassland
C3.1	Tall ruderal	x	Tall ruderal species were associated with the hedgerows.
J2.1.2	Hedgerows	✓	The hedge rows on site comprised of native species.
Key: ✓ Listed as priority habitat X Not listed as priority habitat			

4.5 Protected and Notable Species

4.5.1 Where a species or species group has been omitted, this is due to there being no evidence or no suitability on site to support the species and as such are not considered to be affected by the schemes proposals.

Flora

4.5.2 No species of note were recorded during the survey.

[20] https://www.biodiversitywales.org.uk/environment-wales-act

Reptiles and Amphibians

4.5.3 There are no ponds on site, however there is an off-site pond located within close proximity to the site, approximately 50 m to the east. A HSI assessment was carried out with the results shown in **Table 6**.

4.5.4 There are suitable areas which offer more habitat structure and diversity within the surveyed area, these include the hedgerows and scrub.

4.5.5 The site consists of improved grassland, scrub with tall ruderals, scrub and bound by hedgerows. The suitability of the habitat for reptiles and amphibians in these locations tends to be good in terms of foraging, cover and for dispersal.

Table 6: HSI Score Results

SI #	SI description	SI value P2
1	Geographic location	1.00
2	Pond area m^2	0.95
3	Pond permanence	0.9
4	Water quality	0.67
5	Shade	1.0
6	Waterfowl effect	0.67
7	Fish presence	0.67
8	Pond density (ponds within 1 km)	0.1
9	Terrestrial habitat	0.67
10	Macrophyte cover	0.7
	HSI Score	**0.64**
		Average

eDNA

4.5.6 One pond was sampled for eDNA, located outside of the red line boundary on the Nant Hall Road, the results returned from the laboratory was – A **Negative result,** the results form is provided in **Appendix H.**

Badger

4.5.7 No signs of badger were noted during the Extended Phase 1 survey.

Bats

4.5.8 Two trees, identified as T3 and T35 in the Tree Survey Report by ROAVR 2024[21], are either dying or dead and may provide Potential Roost Features (PRF). Additionally, there are several mature trees located within the southern treeline.

4.5.9 An electrical substation is currently located within the site. This building has moderate potential to support roosting bats, due to the presence of slipped, missing, and lifted tiles on the roof, and the connectivity it offers to the wider landscape for commuting and foraging bats, via adjacent habitats such as the tree line and hedgerow.

The site is predominantly characterised by semi-improved grassland, which offers limited foraging opportunities for bats due to its open nature and lack of structural diversity. However, the trees and hedgerows along the site boundaries provide linear features that serve as flight paths for these species.

Birds

4.5.10 The scrub, hedgerows and scattered trees all provide suitable nesting and foraging habitat for birds. Birds were not in abundance during the survey. Those common species encountered included collared doves (*Streptopelia decaocto*), pigeon (*Columba livia*), robin (*Erithacus rubecula*) blackbirds (*Turdus merula*) and swallows (*Hirundo rustica*).

Hedgehog

4.5.11 This species could utilise the field boundaries and areas of scrub for foraging and dispersal into the wider landscape.

4.6 Priority and Notable species

4.6.1 **Table 7** lists the species with known presence or potential to be present on the site which are Priority Species listed on Section 7 of the Environment (Wales) Act 2016[22] or are considered notable and relevant to the site in question.

Table 7: Summary of Priority Species

Species group	Species	Site Context
Reptiles	Slow worm Common lizard	Some suitable habitats on site. Scrub and hedgerows.
Amphibians	Common toad	Some suitable territorial habitats on site. Scrub and hedgerows. However no freshwater habitats on site.

[21] Barnes A; 2024; *Tree Survey*; ROAVR Group
[22] https://www.gov.wales/sites/default/files/publications/2023-01/list-living-organisms-principal-importance-purpose-maintaining-enhancing-biodiversity-wales.pdf

Species group	Species	Site Context
	Great crested newt	
Birds	Environment Wales Act (2016) S 7 list 51 species of bird of which at least one was noted on site.	The trees, woodland and hedgerows provide suitable nesting and foraging habitat for birds.
Mammals	Bats	Potential roosts sites present on site. Optimal habitat for foraging and commuting bats. The existing hedgerows, grassland and treelines provide foraging and commuting corridors.
	Hedgehog	Suitable habitat within the field boundaries and scrub habitat.
	Badgers	Not none to be present on site. Suitable foraging on site

5 Potential Effects

5.1 Summary

5.1.1 The following sections discuss the potential effects of the works, current at the time of writing, upon the ecological interest at the site and advises upon methods which can either avoid, mitigate, or compensate for these effects.

5.1.2 Potential effects which could arise from the development of a residential scheme consisting of affordable homes and associated infrastructure include the following:

- Direct mortality and disturbance to protected and notable species.
- Direct loss of and disturbance to habitats; and,
- Increased noise, disturbance, and risk of pollution during construction.

5.2 Designated sites

5.2.1 The proposed development will not result in any direct effects on the statutory designated sites, the nearest is The Dee Estuary SPA, Ramsar, and SSSI sites, located approximately 400 m northeast. Construction operations will not encroach upon these sites.

5.2.2 The Gronant Dunes LNR is located approximately 900 m north of the site, given this distance, no effects on the LNR is anticipated.

5.2.3 The Clwydian Range and Dee Valley AONB is located approximately 360m southeast of the site. Existing developments within Prestatyn, along with the A547 Nant Drive Road, create a distinct separation between the site and the AONB. Therefore, the proposals are unlikely to cause any adverse effects on this statutory designation.

5.2.4 The nearest wildlife site, Prestatyn Golf Links is located approximately 365 m north from the site. However, the site is separated from the wildlife site by the A548 Marine Road and the North Wales Main Line railway.

5.3 Effects on Habitat

5.3.1 The site is predominantly comprised of semi-improved agricultural grassland, characterised by a species composition of low diversity, limited to common and widespread species, and consequently, assessed as having low ecological value.

Scattered broad leaved tree (A3.1)

5.3.2 The proposals result in the loss of several semi-mature trees within the development footprint to facilitate the creation of the new access point into the development.

Mixed plantation woodland (A1.3.2)

5.3.3 The potential effects of the development on an existing southern boundary of mixed plantation woodland covered by a TPO include:

- root damage: Construction activities can harm tree roots, affecting their health and stability.
- Edge effects: The development can alter the woodland's environment, leading to increased light levels, noise, and pollution. These changes can harm sensitive woodland species.
- Habitat fragmentation: The development might disrupt wildlife corridors, isolating the woodland and reducing its ecological value.

Improved grassland (B4)

5.3.4 The development will lead to the loss of improved grassland; however, this habitat has limited ecological value.

Tall ruderal

5.3.5 Areas of tall ruderal habitat may be lost temporarily during construction, as these species are notably present within the grassland and hedgerow communities under the development footprint.

Intact species-poor hedge (J2.1.2)

5.3.6 The hedgerows on the site present some ecological value within the local context, forming continuous linear features that could serve as potential wildlife corridors, despite being composed of common species. these habitats are located along the site boundaries. The hedgerow along Bodnant Avenue partial removal will be necessary to facilitate the creation of the new access point into the development.

Building (J3.6)

5.3.7 The only building (TN4) currently on the site is a small electric substation located in the southeast corner adjacent to the public footpath near the entrance to the site from Nant Hall Road. The building is of brick construction with a pitched tiled roof. The proposed development includes demolishing the current building and the construction of a new electrical substation adjacent to its current location.

5.4 Protected and Notable Species

Amphibians and Reptiles

5.4.1 While the site lacks ponds, which are essential for amphibian breeding, habitats suitable for amphibian and reptile dispersal into the wider landscape, as well as foraging, are present within the development's redline boundary.

5.4.2 There is a pond located 50m east of the redline boundary, which had an average HSI score, indicating potential connectivity to the site via grassland, hedgerows, and scrub habitats. GCN are known to travel considerable distances, especially during their breeding season. While ponds are their primary breeding habitat, GCNs also spend a significant portion of their time in surrounding terrestrial habitats for foraging, shelter, and overwintering. Development within the 250m zone of a pond has the potential to impact GCN populations, even if the breeding pond itself is not directly affected.

5.4.3 The field margins and scrub areas are potentially the primary habitat of interest for reptiles and amphibians. Activities with the potential to harm reptiles include the removal of grassland, scrub, trees, and ruderal vegetation, along with excavation, stockpiling of waste or soils, and the movement of machinery across sensitive areas.

Badger

5.4.4 No evidence of badger was noted during the extended Phase 1. No effects on badgers are envisaged.

Bats

5.4.5 There is one building on site (TN4) which has been characterised as having moderate potential for roosting bats is present.

5.4.6 Based on survey data collected to date the following bat species have been confirmed as utilising the site for commuting and foraging:

- Common pipistrelles (*Pipistrellus pipistrellus*) and
- Soprano pipistrelles (*Pipistrellus pygmaeus*)

5.4.7 There is the potential loss or degradation of commuting and foraging habitat (hedgerows and permanent pasture). There will be the loss of scattered trees along Bondant Avenve to facilitate the creation of the new access,

5.4.8 It is assumed that all works would be undertaken during daylight hours, and no night-time work would be required.

5.4.9 Should any semi-mature or mature trees be identified for removal, these should be inspected by a suitably qualified bat worker and advice sought before their removal.

5.4.10 More detail is provided in the bat report by Morris K; 2024; *Bat Survey and Report*; RML

Birds

5.4.11 No evidence of any Schedule 1 bird species was observed at the site during the survey work. Nevertheless, it is probable that the suitable habitats within the site, specifically the trees and hedgerows, may occasionally be utilised by a variety of common bird species.

5.4.12 The main impact on nesting birds would arise if vegetation clearance or disturbance are conducted within the nesting bird season (considered to be March - August inclusive but can be earlier or later in the season dependent upon local climatic conditions).

Hedgehogs

5.4.13 The surveyed area may be used by hedgehogs for foraging, nesting, and dispersal into the wider landscape. The development could result in the direct loss of foraging and nesting habitat, and isolate hedgehog populations, restricting their access to food and mates.

5.4.14 Hedgehogs may face increased mortality due to the risk of injury or death from construction activities, and increased road traffic within the development.

5.4.15 The loss of natural foraging areas, such as grasslands and hedgerows, could reduce food availability for hedgehogs.

5.4.16 Obstacles including new fences and walls can obstruct hedgehog movement. A lack of "hedgehog highways" (gaps in fences) would limit their range.

Invertebrates

5.4.17 The area of grassland to be affected by the proposed construction is of low biodiversity value, being predominantly improved grassland. Consequently, there is no significant effect on invertebrates, most of which would likely re-colonise within gardens and the public open areas upon the completion of the development.

Invasive Non-native species/problematic species (INNS)

5.4.18 No Schedule 9 species were found to be on site during surveys.

6 Recommendations

6.1 Habitats

6.1.1 The current master plan incorporates landscape planting, particularly along the site boundaries, which will enhance valuable ecological corridors for wildlife movement. This planting will not only enhance the existing hedgerows and create a new tree-lined public footpath along through the development but will also integrate native plant species characteristic of the local area. To maximise the benefits for local wildlife, a detailed management plan should be implemented to ensure the long-term health and biodiversity of these newly created habitats.

6.1.2 A Sustainable Drainage System (SuDS) consisting of a detention basin will be created within the northern section of the site. This area will be a semi-permanent pond/basin, meaning it will not hold water continuously but will instead fill during rainfall events, gradually releasing water through ground infiltration. This design contrasts with a retention pond, which maintains a permanent water level. Additionally, swales will be established along the boundary with Bodnant Avenue for further surface water runoff management.

Scattered broad leaved tree (A3.1)

6.1.3 Ideally, construction of the new buildings and associated infrastructure should aim to minimise the loss of semi-mature and mature trees.

6.1.4 Works near trees should be conducted following best practice guidance BS 5837:2012 Trees in relation to design, demolition, and construction. This includes the requirement for a buffer zone known as the Root Protection Area (RPA), to be established around retained trees during construction to avoid unnecessary compaction and physical damage within the tree's rooting system, thereby safeguarding its long-term health and viability.

6.1.5 To enhance the ecological value of the development, any additional trees to be planted should be native species.

Mixed plantation woodland (A1.3.2)

6.1.6 It is understood that the trees within this habitat will not be affected by the development.

6.1.7 Replace any trees removed with new trees of the same species or other suitable native species.

6.1.8 Incorporate new tree planting into the development design to compensate for the loss of existing trees and enhance the overall tree cover.

6.1.9 Any work affecting TPO-protected trees requires consent from the local planning authority. A detailed arboricultural assessment[23], in accordance with BS 5837:2012, is essential to inform development design and minimize impacts on TPO-protected trees.

6.1.10 Establish adequate buffer zones / RPA around the woodland to protect it from edge effects such as increased light levels, noise, and pollution.

6.1.11 Develop a long-term management plan for the retained woodland to ensure its health and resilience. This plan should include measures to control invasive species, promote natural regeneration, and enhance biodiversity.

Improved grassland (B4)

6.1.12 The loss of improved grassland can be mitigated by enhancing the species diversity of the proposed grassland to exhibit characteristics of species-rich meadow grassland. This can be achieved through appropriate seeding and management, including a less intensive management regime and the introduction of pollinator-friendly and night-scented plant species to enhance bat foraging opportunities.

Intact species-poor hedge (J2.1.2)

6.1.13 Retain existing hedgerows wherever possible. Where enhancement is feasible, including the in-filling of species poor hedgerows, this should be done with native species planting to improve connectivity and provide habitat for wildlife.

Building (J3.6)

6.1.14 The proposed development involves the demolition of an existing substation (TN4) and the construction of a new building in an adjacent location. Given that the existing substation has moderate potential to support roosting bats, two emergence surveys are recommended to determine whether bats are currently using the structure. This is crucial for ensuring compliance with wildlife protection legislation and informing appropriate mitigation strategies.

6.2 Protected and Notable Species

Amphibians and Reptiles

6.2.1 It is important to note that a lack of existing records for this location should not be interpreted as evidence of GCN absence, but rather an absence of survey data. An eDNA survey was carried out during the GCN breeding season to optimise detection probability, which typically extends from mid-April to June, which returned a negative result, no further surveys are recommended.

[23] Pearce R; 2024; *Arboricultural Survey to BS5837:2012;* Arbtech

6.2.2 If work is carried out within habitat considered as suitable terrestrial habitat for amphibians and reptiles, then it is recommended that a Method Statement and Toolbox Talk should be given to all contractors involved with site clearance works to make them aware of amphibians and reptiles which could be encountered, and what to do if they are found.

6.2.3 If any amphibians or reptiles are found, these must be removed away from the works, into suitable habitat. If great crested newts are found, then all work must stop, and follow up consultation with a suitably qualified ecologist.

Badgers

6.2.4 If sett entrances are found at any time during site clearance works, works must stop, and a suitably qualified ecologist must be consulted on the way forward. Location of the of the sett and extent of potential disturbance will need to be assessed and if setts are discovered within 30 m of any works, a licence from Natural Resources Wales (NRW) may be required.

Bats

6.2.1 Specific detail is provided in the bat report by Morris K; 2025; *Bat Survey and Report*; RML 2025. **Which include two additional surveys to the electric substation.**

Birds

6.2.2 Removal of vegetation which could support nesting birds should be undertaken outside the bird breeding season (March to August inclusive). It is advised that if works are programmed to start at a time which conflicts with this, then site clearance works (i.e., the removal of the tall ruderal habitat, scrub, trees etc.) should be conducted following a nesting bird check by a suitably experienced ecologist. Any regrowth should be kept short to deter nesting birds. Any active nests should be left undisturbed with a suitable buffer (dependent upon species found) until the nest is no longer in use and checked by the ecologist.

6.2.3 It is recommended that a variety of bird boxes be incorporated into proposals to offer additional nesting opportunities while the planting scheme matures examples are shown in **Appendix I**.

Hedgehogs

6.2.4 Preserve as much of the existing natural habitat as possible, including hedgerows, trees, and grasslands.

6.2.5 Incorporate hedgehog-friendly features into the development, such as log piles and compost heaps for nesting and shelter, native tree and shrub planting for foraging and cover.

6.2.6 Recommendations to have safe construction practices include, to implement measures to prevent hedgehogs from being injured or killed during construction, such as:

- Checking areas for hedgehogs before starting work.
- If any trenches/excavations are dug, then these must be either covered over each night or an egress ramp installed.
- Storing materials carefully to prevent hedgehogs from becoming trapped.

6.2.7 Any hedgehogs encountered during site clearance and preparation activities must be safely moved to a suitable location outside the construction area.

6.2.8 All fencing within the development requires provisions for hedgehog passage, such as hedgehog holes or appropriately sized gaps underneath fences. These gaps are known as "hedgehog highways" and should be incorporated into fencing between plots. The gaps should be approximately 13cm x 13cm and located at ground level to allow hedgehogs to pass through. It is recommended that these gaps are included in all new fencing within the development to maintain connectivity and allow hedgehogs to roam freely. **Appendix H** indicates the location of the hedgehog highways on a plan of the site.

Invertebrates

6.2.9 The development preserves existing natural habitat, including hedgerows and trees.

6.2.10 Measures to include resources for invertebrates within the development designs include the inclusion of water features, retention of areas of grassland with a longer sward, in particular around the SuDS proposals and adjacent to hedgerows, and the incorporation of features for invertebrates, for example bee brick within stone or retaining walls, preferable south facing.

6.2.11 The inclusion of bee bricks[24] in new housing developments offers a simple yet effective strategy to support solitary bee populations, which are vital pollinators facing decline due to habitat loss. By providing dedicated nesting spaces within the built environment, bee bricks can enhance local biodiversity and contribute to the ecological value of the development. For optimal use, bee bricks should be integrated into south-facing walls to maximise sun exposure, ideally at least one meter above ground level to reduce dampness and predation.

6.2.12 Minimise artificial lighting by use directional lighting to reduce light pollution, which can disorient nocturnal invertebrates.

[24] https://www.nhbs.com/solitary-bee-bricks

7 Conclusion

7.1 Summary

7.1.1 This report presents the findings of the Extended Phase 1 habitat survey and provides an assessment of the potential effects on ecological features which may result from the proposed development works.

7.1.2 No designated sites will be affected directly by the proposed development.

7.1.3 The site was assessed using an Extended Phase 1 survey methodology, with a specific focus on its potential use by any protected or/and notable species. Furthermore, targeted survey work was conducted for GCN suitability.

7.1.4 The site supports and has the potential to support several protected and notable species including bats, and nesting birds. No bat roosts have been identified to date. Recommendation have been made is **Section 6**.

7.1.5 There is minimal biodiversity losses anticipated because of the scheme proposals. However, there are numerous opportunities of net benefits for biodiversity.

7.1.6 Several enhancements have been recommended to be integrated into the development proposals for the site to maximise biodiversity opportunities in accordance with Planning Policies Wales 12. These enhancements include the implementation and management of new landscape planting featuring native species indigenous to the local area, as well as the installation of bat and bird boxes.

7.1.7 The details in this report will remain valid for a period of 18 months from the date of this report (May 2027) after which if no site works have commenced, the validity of this assessment should be reviewed to determine whether further updates are necessary.

8 Reference

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- Stace, C, 2019. New Flora of the British Isles (Fourth Edition).
- The use of environmental DNA test for Great crested newt licensing purposes. NRW: https://cdn.naturalresources.wales/media/3509/guidance-on-use-of-dna-sampling-of-great-crested-newts.pdf?mode=pad&rnd=131611854000000000
- TPO https://maps.denbighshire.gov.uk/Documents/Tree%20Preservation%20Orders/Prestatyn/Prestatyn%20Blanket%20TPO%201950.pdf

APPENDIX A: Site Location

1 Llys Clwyd, Cwrt Y Dderwen, Ffordd Celyn, Ruthin, Denbighshire LL15 1NJ
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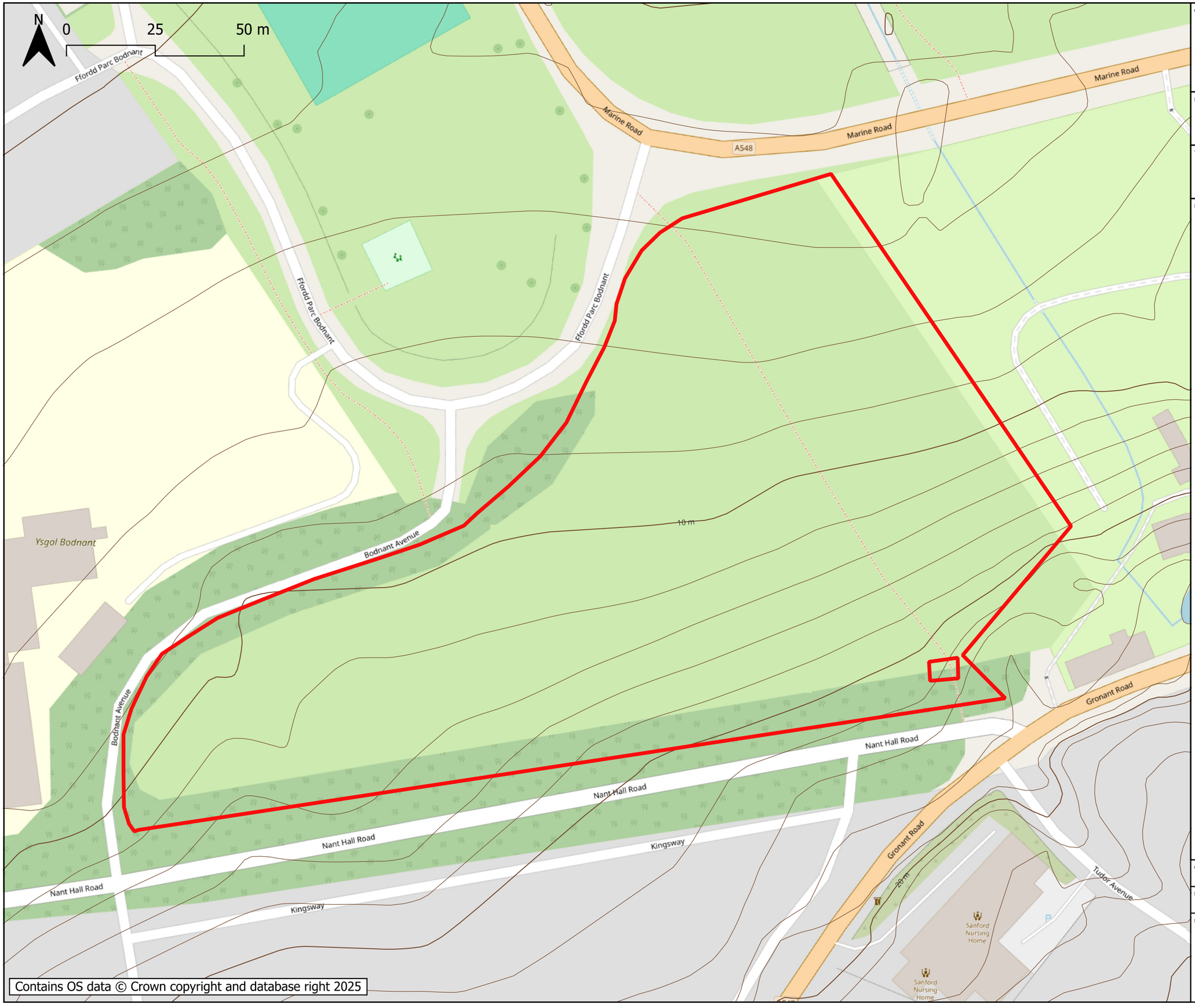
Registered in England and Wales No. 1848683 VAT Reg No. 401 424 313



Cleient / Client:

Adra

Enw project / Project name:

BODNANT AVENUE, PRESTATYN

Teitl lluniad / Drawing title:

Site Location

Eglurhad / Key:

Redline Boundary

Insert map 1:2,000,000 @ A3
Based upon Getmapping Aerial Photography. © Getmapping plc

Graddfa / Scale (A3):	Dyddiad / Date:	Darlunwyd gan: Drawn by: KM
1:1000 @ A3	May/2025	Gwirwyd gan: Checked by: JS
Rhif lluniad / Drawing number: 3307-RML-PEA-DR-01		Cywiriad: Revision: 01

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APPENDIX B: Proposed Plans

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email: rml@rmlconsult.com web: www.rmlconsult.com
Tel: +44(0)1824 704366
Registered in England and Wales No. 1848683 VAT Reg No. 401 424 313

14x	2P1B FLAT	53m²
8x	3P2B BUNGALOW	58m²
18x	4P2B HOUSE	83m²
10x	5P3B HOUSE	93m²
10x	5P3B DA CORNER HOUSE	93m²
2x	7P4B HOUSE	114m²

TOTAL - 62 PLOTS

TOTAL SITE AREA - 25019m²

Prestayn Road

Prestayn Road

6.7m

Ffordd Parc Bodnant

Play Area

Bench

Public Open Space
2800m²

Active Travel Footpath

Flood Basin

Swale

Swale

Swale

Swale

Bodnant Community School

New Site Access

34m Visibility Splay

Amenity Space 180m²

Bodnant Avenue

ARB SURVEY RPA

Woodland Walk

Amenity Space 1050m²

Possible Stock Proof Fence

Nant Hall Road / Ffordd Llys Nant

13.1m

New Access Point

11.0m

N 383,000.000 m
E 307,025.000 m

Mostyn Ave

Proposed Sub Station?

Existing Sub Station

17.7m

Nant Mill Cottage

The Coach House

Gronant Rd

PROPOSED SITE LAYOUT

SCALE: 1 : 500

0m 10m 20m 30m 40m 50m

VISUAL SCALE 1:500 @ A1

N

REV	DESCRIPTION	DATE	BY

PROJECT

BODNANT AVE, PRESTATYN
for ADRA

DRAWING TITLE

PROPOSED SITE LAYOUT

SCALE	DATE	DRAWN	CHECKED
1 : 500 @A1	24/10/24	ED	SV

DRAWING STATUS: PRELIMINARY

JOB No	DRAWING No	REVISION
C1148	SK008	

AINSLEY GOMMON ARCHITECTS
THE OLD POLICE STATION, 15 GLYNNE WAY, HAWARDEN, CH5 3NS
Tel: 01244 537 100 | wales@agarchitects.co.uk | www.agarchitects.co.uk
Ainsley Gommon Architects Ltd. Registered in England & Wales No.4187948
Registered Office: 1 Price Street, Hamilton Square, Birkenhead CH41 6JN

PRINTED: 10/12/2024 11:52:14

A1

APPENDIX C: REVEVANT PROTECTED SPECIES LEGISLATION

The following has been produced as a guide, to outline possible offences that could occur during the scheme. For a definitive list of all species of flora and fauna, and a full interpretation you should refer to relevant Acts listed below.

Conservation of Habitats and Species Regulations 2017 (as amended)

Schedule 2 applies to all European Protected Species (EPS) which includes all bat species, otters, great crested newts, dormice, otters, sand lizards, smooth snake and natterjack toad amongst others. The protection afforded is overlapping but separate from the Wildlife and Countryside Act 1981 (as amended).

It is an offence:

- to deliberately capture, injure or kill
- to deliberately disturb
- to damage or destroy a breeding site or resting place of an EPS; this applies whether species are present or not.

The Wildlife and Countryside Act 1981 (as amended)

Applies to all wild birds where it is an offence:

- to kill, injure or take any wild bird (subject to certain exceptions)
- to take, damage or destroy a nest whilst it is in use or being built
- to take or destroy the egg of any wild bird

Schedule 1

It is also an offence to disturb any wild bird listed on Schedule 1 of the Wildlife & Countryside Act 1981 (as amended)

- while it is nest building
- at a nest containing eggs or young
- disturbs the dependant young of any such bird.

Schedule 5

For animals fully protected under Schedule 5 which includes all bats, great crested newts, otters, water voles, sand lizards, smooth snake and natterjack toad, it is an offence:

- to intentionally kill or injure or take
- to intentionally damage or destroy or obstruct access to any structure or place which a species uses for shelter or protection, at any time even if the animal is not there
- to intentionally disturb whilst it is occupying a place which it uses for shelter or protection
- to obstruct access to any structure or place which an animal uses for shelter or protection

Adder, grass snake, common lizard and slow worm are only protected from being killed or injured and the white- clawed crayfish is only protected from being taken.

Schedule 9

Invasive non-native species are listed under Schedule 9. It is an offence:

- to plant or otherwise cause to grow in the wild any species listed on Schedule 9.

In addition, The Invasive Alien Species (Enforcement & Permitting Order took effect on the 1st December 2019. It introduces enforcement provisions, offences and penalties needed to comply with the requirements of EU Regulation (1143/2014) on the prevention and management of the introduction and spread of invasive alien species. The provisions apply to 66 species known as 'species of Union concern'. Under the Order, NRW and the police may impose criminal sanctions in Wales relating to an offence under the Order. As the regulator, NRW may also impose civil sanctions.

Licences may be issued under the Order allowing activities which are prohibited under the EU Regulation to be carried out. These activities can only be carried out in compliance with the conditions of a licence. Natural Resources Wales are the licensing body in Wales.

APPENDIX D: Cofnod Data – within a separate document

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APPENDIX E: Phase 1 and Target Notes

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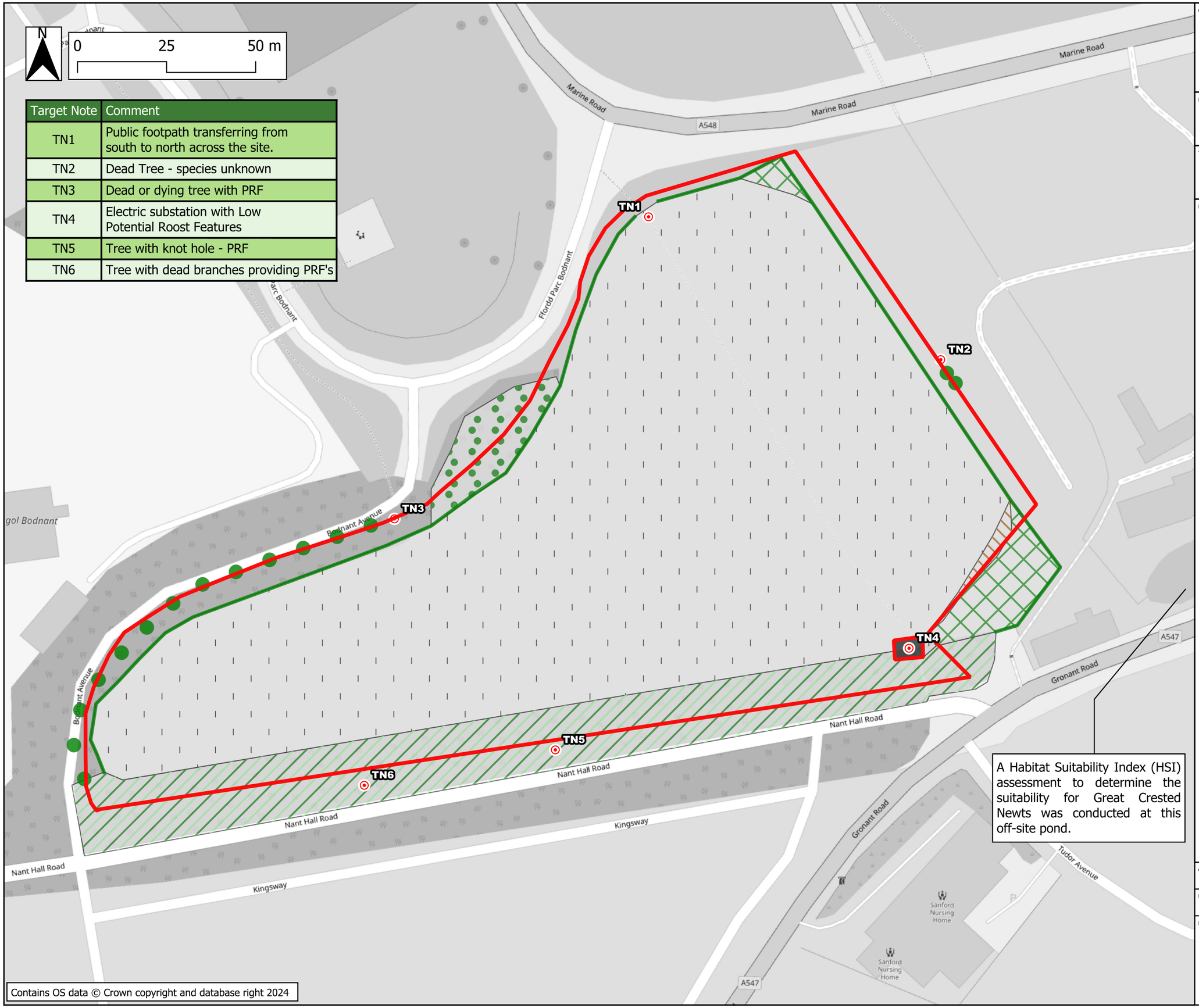

Target Note	Comment
TN1	Public footpath transferring from south to north across the site.
TN2	Dead Tree - species unknown
TN3	Dead or dying tree with PRF
TN4	Electric substation with Low Potential Roost Features
TN5	Tree with knot hole - PRF
TN6	Tree with dead branches providing PRF's

Cleient / Client:

Adra

Enw project / Project name:

BODNANT AVENUE, PRESTATYN

Teitl lluniad / Drawing title:

Phase 1 Plan

Eglurhad / Key:

- Redline Boundary
- A1.3.2 - Mixed woodland - plantation
- A2.1 - Scrub - dense/continuous
- A3.1 - Broadleaved Parkland/ scattered trees
- B4 - Improved grassland
- C3.1 - Other tall herb and fern - ruderal
- J3.6 - Buildings
- A3.1 - Broadleaved Parkland/ scattered trees
- J2.1.2 - Intact hedge: species -poor
- Parkland, scattered trees, broad-leaved
- Target Note

Graddfa / Scale (A3): 1: 1000@ A3	Dyddiad / Date: Oct 2024	Darlunwyd gan: Drawn by:	KM
		Gwiriwyd gan: Checked by:	JS
Rhif lluniad / Drawing number: 3307-RML-PEA-Dr-05		Cywiriad: Revision:	01

Darparwyd gan / Prepared by:

RML
Y Cwrwd, Cwrt Y Dderwen, Ffordd Celyn, Ruthin, Denbighshire LL15 1NJ
Rhif Ffon/Tel: +44 (0)1824 704366, Ffacs/Fax: +44 (0)1824 705450
e-bost/e-mail: rml@rmlconsult.com, Gwefan/Website: www.rmlconsult.com

APPENDIX F: Designated Sites Plans

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N

0 250 500 m

Liverpool Bay / Bae Lerpwl (SPA)

Gronant Dunes (LNR)

Dee Estuary / Aber Afon Dyferdwy (SPA) (SSSI) (RAMSAR)

Clwydain Range and Dee Valley / Bryniau Clwyd a Dyffryn Dyfrdwy (AONB)

Prestatyn Hillside (SSSI)

Cleient / Client:

Adra

Enw project / Project name:

BODNANT AVENUE, PRESTATYN

Teitl lluniad / Drawing title:

Designated Sites

Eglurhad / Key:

- Redline Boundary
- Special Protection Areas (SPA)
- Ramsar
- Sites of Special Scientific Interest (SSSI)
- Local Nature Reserves (LNR)
- Area of Outstanding Natural Beauty (AONB)

Graddfa / Scale (A3):	Dyddiad / Date:	Darlunwyd gan: Drawn by:	KM
1:10000@ A3	Apr/2025	Gwirwyd gan: Checked by:	JS
Rhif lluniad / Drawing number: 3307-RML-PEA-DR-03		Cywiriad: Revision:	01

Darparwyd gan / Prepared by:

RML
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N

0 250 500 m

Prestatyn Golf Links

Coed Bell

Y Morfa

The Dingle

Top Y Nant Wood

Cleient / Client:

Adra

Enw project / Project name:

BODNANT AVENUE, PRESTATYN

Teitl lluniad / Drawing title:

Non Designated Sites

Eglurhad / Key:

Redline Boundary

Wildlife Sites

Graddfa / Scale (A3): 1:10000@ A3	Dyddiad / Date: Oct 2024	Darlunwyd gan: Drawn by:	KM
		Gwirwyd gan: Checked by:	JS
Rhif lluniad / Drawing number: 3307-RML-PEA-DR-04		Cyfrwiad: Revision:	01

Darparwyd gan / Prepared by:

RML
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APPENDIX G: Photographs

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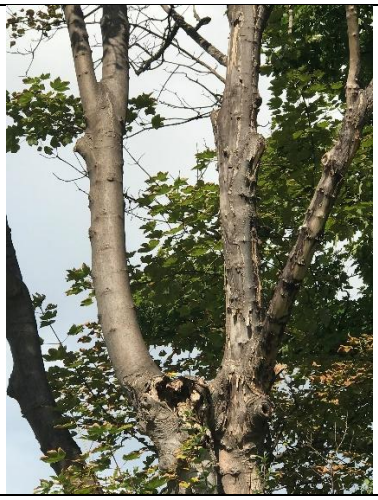
Table x: Photograph Reference

<table>
<tr><td colspan="2">  </td></tr>
<tr><td colspan="2">Photograph 1: Panoramic view of the site from the southeast footpath entrance</td></tr>
<tr><td>  </td><td>  </td></tr>
<tr><td>Photograph 2: view across the site from northeast looking southwest.</td><td>Photograph 3: a two mature beech (Fagus sylvatica) which is notable within hedgerow (HR2) to the east of the site.</td></tr>
<tr><td></td><td></td></tr>
</table>

	
Photograph 4: There is a line of sycamore (*Acer pseudoplatanus*) trees which follows the hedgerow (HR1).	**Photograph 5**: mixed plantation woodland along the northern boundary with Nant Hall Road.
	
Photograph 6: Improved grassland which is the main habitat on site, looking north.	**Photograph 7**: Hedgerow (HR1) along the eastern boundary with the caravan site.
	
Photograph 8: Hedgerow (HR2) along the northern boundary with Bodnant Avenue.	**Photograph 9**: Is a small building, an electric substation, located in the southeast which is classed as having low potential for roosting bats.



Photograph 10: A dead tree with low potential for roosting bats TN3

Photograph 11: a tree along the southern boundary with knot holes which have a low potential for roosting bats, TN6.

Photograph 12: a tree along the southern boundary with two potential roosing location for bats, within a knothole and within the dead wood of a dead branch TN5.

Photograph 13: a tree along the southern boundary with two potential roosing location for bats, within a knothole and within the dead wood of a dead branch TN5.

Photograph 14: the substation provides a low potential for roosting bats under slipped and lifted tiles.

APPENDIX H: Surescreen Results

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Folio No:	3080-2025
Purchase Order:	29017
Contact:	RML Consult
Issue Date:	11.07.2025
Received Date:	27.06.2025

GCN Report

Technical Report

SureScreen Scientifics

Folio No: 3080-2025
Purchase Order: 29017
Contact: RML Consult
Issue Date: 11.07.2025
Received Date: 27.06.2025

SureScreen Scientifics

GCN eDNA Analysis

Summary

When great crested newts (GCN), *Triturus cristatus* , inhabit a pond, they continuously release small amounts of their DNA into the environment. By collecting and analyzing water samples, we can detect these small traces of environmental DNA (eDNA) to confirm GCN habitation or establish GCN absence.

Results

Lab ID	Site Name	OS Reference	Degradation Check	Inhibition Check	Result	Positive Replicates
GCN25 9343	Bodnant Avenue P1		Pass	Pass	Negative	0/12

Matters affecting result: none

Reported by: Lauryn Jewkes

Approved by: Consuela Sopronyi

Folio No:	3080-2025
Purchase Order:	29017
Contact:	RML Consult
Issue Date:	11.07.2025
Received Date:	27.06.2025

SureScreen Scientifics

Methodology

The samples detailed above have been analyzed for the presence of GCN eDNA following the protocol stated in DEFRA WC1067 'Analytical and methodological development for improved surveillance of the Great Crested Newt, Appendix 5.' (Biggs et al. 2014). Each of the 6 sub-sample tubes are first centrifuged and pooled together into a single sample tube which then undergoes DNA extraction. The extracted sample is then analyzed using real-time PCR (qPCR), which uses species-specific molecular markers to amplify GCN DNA within a sample. These markers are unique to GCN DNA, meaning that there should be no detection of closely related species.

If GCN DNA is present, the DNA is amplified up to a detectable level, resulting in positive species detection. If GCN DNA is not present then amplification does not occur, and a negative result is recorded. Analysis of eDNA requires attention to detail to prevent the risk of contamination. True positive controls, negative controls, and spiked synthetic DNA are included in every analysis and these have to be correct before any result is declared and reported. Stages of the DNA analysis are also conducted in different buildings at our premises for added analytical security.

SureScreen Scientifics Ltd is ISO9001 accredited and participates in Natural England's proficiency testing scheme for GCN eDNA testing.

Interpretation of Results

Sample Integrity Check: When samples are received in the laboratory, they are inspected for any tube leakage, suitability of sample (not too much mud or weed etc.) and absence of any factors that could potentially lead to inconclusive results. Any samples which fail this test are rejected and eliminated before analysis.

Degradation Check: **Pass/Fail**. Analysis of the spiked DNA marker to see if there has been degradation of the kit or sample between the date it was made to the date of analysis. Degradation of the spiked DNA marker may lead indicate a risk of false negative results.

Inhibition Check: **Pass/Fail.** The presence of inhibitors within a sample is assessed using a DNA marker. If inhibition is detected, samples are purified and re-analyzed. Inhibitors cannot always be removed, if the inhibition check fails, the sample should be re-collected.

Result: **Presence of GCN eDNA (Positive/Negative/Inconclusive)**
Positive: GCN DNA was identified within the sample, indicative of GCN presence within the sampling location at the time the sample was taken or within the recent past at the sampling location.
Positive Replicates: Number of positive qPCR replicates out of a series of 12. If one or more of these are found to be positive the pond is declared positive for GCN presence. It may be assumed that small fractions of positive analyses suggest low level presence, but this cannot currently be used for population studies. In accordance with the WC1067 Natural England protocol, even a score of 1/12 is declared positive. 0/12 indicates negative GCN presence.
Negative: GCN eDNA was not detected or is below the threshold detection level and the test result should be considered as evidence of GCN absence, however, does not exclude the potential for GCN presence below the limit of detection.
Inconclusive: Controls indicate inhibition or degradation of the sample, resulting in the inability to provide conclusive evidence for GCN presence or absence.

APPENDIX I: Example Bat / Bird Boxes and Hedgehog Highways

Bat access slates Links to suppliers[25] and images	
Bat access slate https://beddoesproducts.com/products/bat-access-slate	
Bat access tile for slated & tiled pitched roofs https://www.justlead.co.uk/product/bat-access-tile-weathering/	
Bat Access Slate For Natural Spanish Slates 500mm x 250mm https://www.aboutroofing.com/bat-access-slate-natural-spanish-slate-500mm-x-250mm.html	
https://www.manthorpebp.co.uk/environmental/bat-ridge-roost/bat-ridge-roost-0	

[25] Other suppliers are available

Ibstock Enclosed Bat Box 'C' https://www.nhbs.com/4/practical-conservation-equipment?q=&hPP=60&idx=titles&p=0&fR%5Bhide%5D%5B0%5D=false&fR%5Bhide%5D%5B1%5D=false&fR%5Blive%5D%5B0%5D=true&fR%5Blive%5D%5B1%5D=true&fR%5Bshops.id%5D%5B0%5D=4&fR%5Bshops.id%5D%5B1%5D=4&fR%5Bsubsidiaries%5D%5B0%5D=1&hFR%5Bsubjects_equipment.lvl1%5D%5B0%5D=Bat%20Boxes%20%3E%20Integrated%20Bat%20Boxes&gad_source=1&gclid=Cj0KCQjw1Yy5BhD-ARIsAI0RbXbX4ycA1cB7y_1rzcgHSOGRZUQDPwKJFtDuzOskjO_l_HNyBlU1e10aAicWEALw_wcB&qtview=193867	
Externally mounted – trees	
2F Schwegler Bat Box (General Purpose) https://www.nhbs.com currently out of stock from this supplier - **usually dispatched between 1 – 2 weeks**	
Eco Kent Bat Box https://www.nhbs.com/ currently out of stock from this supplier - **Usually dispatched within 1-2 months**	
2FN Schwegler Bat Box https://www.nhbs.com//bat-boxes currently out of stock – **usually dispatched between 1 – 2 weeks**