IONITY Wrexham

Net Benefits for Biodiversity - Green Infrastructure Assessment

IONITY

May 2024

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Quality information

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Revision History

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Table of Contents

1. Introduction 1
1.1 Legislation and Policy 1
1.1.1 National Planning Policy 1
1.1.2 Local Policy and Guidance 1
2. Methodology 2
2.1 Baseline Information 3
2.2 Post-Intervention Information 3
2.3 Step-Wise Approach 3
2.4 DECCA Framework 4
2.5 Metric – Quantitative Data 4
3. Discussion 5
3.1 Baseline Biodiversity 5
3.1.1 Designated Sites 5
3.1.2 Habitats 5
3.1.2.1 Baseline Metric Data 6
3.1.3 Species 6
3.2 Post-Intervention Biodiversity 6
3.2.1 Proposed Habitats 6
3.2.1.1 Post-Intervention Metric Data 7
4. Conclusion 8
Appendix A Baseline Plan 9
Appendix B Post-Development Plan 10

Figures

Figure 1. Step-Wise Approach to Mitigation 3
Figure 2. DECCA framework 4

Tables

Table 1. Baseline Area-Based Habitats 6
Table 2. Baseline Hedgerow Habitats 6
Table 3. Post-Intervention Area-Based Habitats 7
Table 4. Post-Intervention Hedgerow Habitats 7
Table 5. Summary of Results 8

1. Introduction

AECOM has prepared this report on behalf of IONITY (hereafter referred to as the 'Client') to support discharging Condition 10 of Application P/2023/0278. Application P/2023/0278 was granted planning consent on 01 February 2024 for the construction of an electric vehicle (EV) charging site and associated infrastructure and works to create 8 parking spaces (hereafter referred to as the 'Scheme') on the car park and land associated with the Ramada Plaza Hotel, Wrexham (hereafter referred to as the 'Site'). The Site's central Ordnance Survey National Grid Reference is SJ 32259 50779.

Condition 10 of Application P/2023/0278 states the following:

"No part of the development shall commence until a plan to provide net benefit for biodiversity (NBB) i.e. a better outcome than if the site was left undeveloped has been submitted to, and approved in writing by, the Local Planning Authority. The measures shall be implemented in full, prior to first occupation / use of the development, and thereafter maintained for the lifetime of the development".

To discharge this condition, AECOM have prepared this Green Infrastructure Assessment (GIA). The objectives of this GIA are to demonstrate how the proposed Scheme has:

1. applied the step-wise approach to mitigation;
2. utilised the DECCA (Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience) Framework to support ecosystem resilience with regards to green infrastructure;
3. achieved Net Benefits for Biodiversity.

Legislation and Policy

National Planning Policy

The Environment (Wales) Act 2016 Part 1 – Section 6: 'Biodiversity and resilience of ecosystems duty' states that public authorities "*must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions"*[1].

Planning Policy Wales (PPW) 12[2] expands on this by stating: "*the planning system has a key role to play in helping to reverse the decline in biodiversity and increase the resilience of ecosystems. Recognising that development needs to take place and some biodiversity may be impacted, the planning system should ensure that overall, there is a net benefit for biodiversity and ecosystem resilience, resulting in enhanced well-being".*

PPW 12[2] also states that: *"All development must deliver a net benefit for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed)".*

Local Policy and Guidance

PPW 12[2] included instructions for planning authorities to adopt a *"strategic and proactive approach to green infrastructure"* by producing *"up to date inventories and maps of existing green infrastructure and ecological assets and networks"* with the intent of forming *"local authority wide green infrastructure strategies".* The long-term plan is for these strategies to be given "*early consideration in development proposals, and inform the design and implementation of projects".*

However, PPW 12[2] was only released in February 2024, thus Wrexham County Borough Council are yet to have developed a Green Infrastructure Strategy. Currently, the 'Wrexham Local Development Plan 2 (LDP2) 2013 to 2028' is under development, with the most recent plan being the Wrexham Unitary Development Plan 1996 – 2011[3], which was adopted in 2005.

[1] Llywodraeth Cymru Welsh Government (2016). Environment (Wales) Act 2016. – Section 6.
[2] Welsh Government (2024) Planning Policy Wales. Edition 12. February 2024.
[3] Wrexham County Borough Council (2005). Wrexham Unitary Development Plan 1996 – 2011.

Wrexham Unitary Development Plan 1996 – 2011[3] contains the following relevant policies:

- **Policy PS11** – 'Biodiversity', which states: *"Encouragement will be given to proposals which improve the biodiversity value of sites".*
- **Policy EC4** – 'Hedgerows. Trees and Woodland', which states: *Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodland, wildlife and other natural landscape and water features, and include new planting in order to enhance the character of the landscape and townscape.*

Natural Resources Wales (NRW)'s North East Wales Area Statement[4] covers Wrexham; this statement contains five themes which act as recommendations for helping to address the climate emergency, these are listed below:

- Theme 1: Climate emergency: resilience and adaptation;
- Theme 2: Develop and improve urban/rural green infrastructure;
- Theme 3: Increasing woodland cover for social, environmental, and economic benefits;
- Theme 4: Promoting the resilience of ecosystems in maintaining and enhancing biodiversity; and,
- Theme 5: Protecting water and soil through farming and sustainable land management.

2. Methodology

The Welsh Government and NRW have yet to release guidance on how to undertake GIAs. With this in mind, this assessment has been carried out by amalgamation of information that has been released to date.

The assessment undertaken in this GIA incorporates guidance from the following resources:

- PPW 12[2];
- NRW's guidance note for local planning authority staff undertaking a Green Infrastructure Assessment[5];
- Welsh Government's Approach to Net Benefits for Biodiversity and the DECCA Framework in the Terrestrial Planning System[6]; and,
- NRW's Terrestrial and freshwater Resilient Ecological Networks: a guide for practitioners in Wales[7].

A key theme that emerges from these resources is the need for any assessment to *"be proportionate to the scale and nature of the development proposed"* and *"in the case of minor development this will be a short description and should not be an onerous requirement for applicants".* This is a key consideration when factoring in the small size and nature of the impacts of the Scheme.

With this in mind, the step-wise approach to mitigation and consideration of the DECCA Framework will inform a qualitative comparison between baseline biodiversity and proposed post-intervention biodiversity to determine whether a net biodiversity benefit is achieved by the Scheme. Wider topics such as the Building with Nature Standards Framework[8] have been scoped out as the topic is considered appropriate due to the small size of the Scheme.

To support this qualitative assessment, a Statutory Biodiversity Metric[9] (hereafter referred to as the 'Metric') calculation has been carried out to provide a quantitative element for the assessment of the proposed Scheme. With this in mind, a Metric calculation has been carried out to aide this GIA.

[4] Natural Resources Wales (2019). Introduction to North East Wales Area Statement.
[5] Natural Resources Wales (2023). Guidance Note For Local Planning Authority Staff Undertaking A Green Infrastructure Assessment.
[6] CIEEM (2022). CIEEM Briefing Paper - Welsh Government's Approach to Net Benefits for Biodiversity and the DECCA Framework in the Terrestrial Planning System.
[7] Natural Resources Wales (2021). Terrestrial and freshwater Resilient Ecological Networks: a guide for practitioners in Wales.
[8] Building with Nature (2022) Standards Framework. Version 2. October 2022.
[9] DEFRA (2023). The Statutory Biodiversity Metric

Baseline Information

The identification of existing Green Infrastructure assets and networks and understanding of existing biodiversity assets forms an essential step in the net benefit assessment. The baseline condition of habitats present within the Site are detailed in the Preliminary Ecological Appraisal (PEA) report[10] and have been considered in this GIA. The baseline situation for the Site is presented in Appendix A.

Post-Intervention Information

The following plans for the Scheme have informed the post-intervention information for this GIA:

- Landscape Layout Southern Car Park – Drawing Number: ACM-WRE-00-DR-LA-1002.

These post-intervention plans are presented in Appendix B. This includes reference to a northern car park area that is to be developed later than the EV charging site. Therefore, the Scheme proposes to deliver enhancements in the southern section to ensure NBB targets are fully met prior to first use of the EV charging site in accordance with Condition 10. With this in mind, consideration of the potential benefits of the proposed northern car park landscaping layout has been scoped out of this assessment (Drawing Number: ACM-WRE-00-DR-LA-1001).

Step-Wise Approach

This assessment demonstrates how the proposed Scheme has applied the step-wise approach to mitigation, as illustrated in Figure 1 and detailed in Section 6.4.15 of PPW.

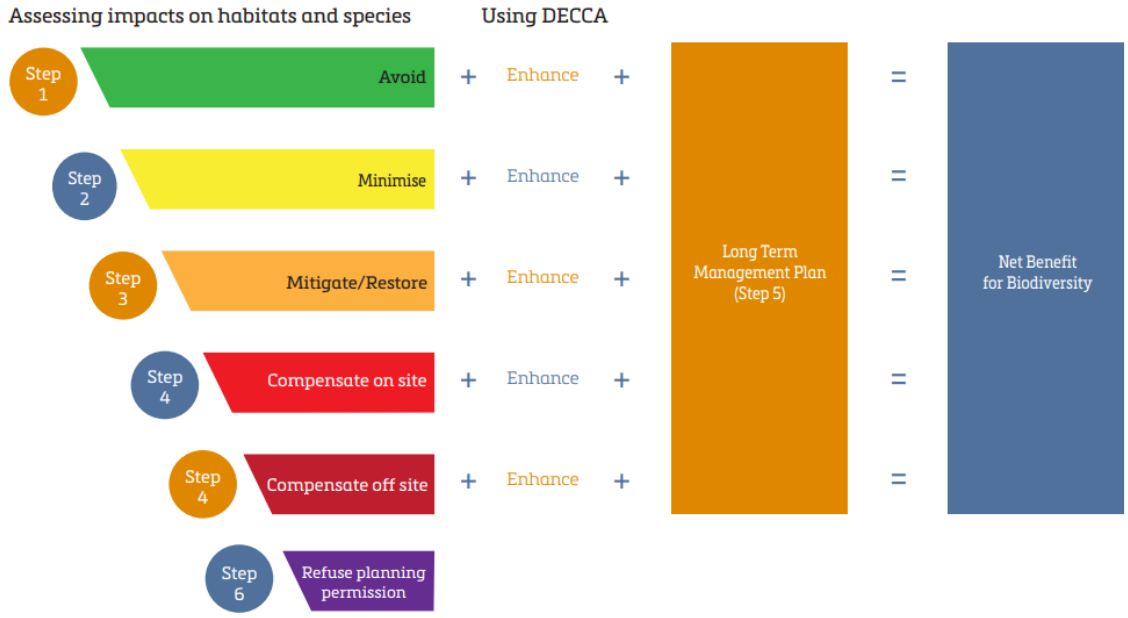


Figure 1. Step-Wise Approach to Mitigation

(Source: Planning Policy Wales[11])

The step-wise approach sets out the steps in order of priority to ensure that adverse effects on biodiversity is reduced. The measures undertaken at each step must be incorporated with enhancement measures and the principles of the DECCA Framework (outlined in Section 6) to ensure a net benefit for biodiversity is achieved.

1. **Avoid –** The first priority is the avoidance of impacts on biodiversity.
2. **Minimise** – If avoidance is not possible, adverse impacts to biodiversity must be minimised, by reducing the scale of any proposed impacts.
3. **Mitigate/Restore** – If impacts cannot be avoided or minimised then adverse effects to biodiversity must be mitigated against, and/ or habitats and features for species restored. The mitigation and restoration must

[10] AECOM (2023). High-Performance Charging Infrastructure for Electric Vehicles - Preliminary Ecological Appraisal.
[11] Welsh Government (2024) Planning Policy Wales. Edition 12. February 2024.

target the specific adverse effects of the impacts, seek to restore in excess of like-to-like, and account for factors like time lags in recovery of habitats and species populations.

4. **Compensate (on- or off-site)** – When the first three steps have been exhausted, compensation within the 'Site' (4a), or off 'Site' (4b) is required. Compensation must always be a last resort and must be of significant magnitude to fully compensate for any loss.
5. **Long Term Management Plan** – A Long-Term Management Plan should be produced setting out the management of the Scheme, and future monitoring arrangements for all secured measures. The management plan must identify the funding mechanisms in place to meet the management plan objectives and the achievement of net benefits for biodiversity.
6. **Refuse Planning Permission** – Failure to action any of these steps will result in a planning application being refused.

DECCA Framework

This Green Infrastructure statement demonstrates how the proposed Project supports ecosystem resilience. Ecosystem resilience is defined by NRW as:

'the capacity of ecosystems to deal with disturbances, either by resisting them, recovering from them, or adapting to them, whilst retaining their ability to deliver services and benefits now and in the future' (Disturbances are interpreted to mean pressures and demands on the ecosystem)."

Efforts to maintain and strengthen the following attributes within the DECCA Framework has been considered to support ecosystem resilience in association with the proposed Scheme:

1. **diversity** at all scales including genetic, species, habitat and ecosystems or landscape scale;
2. **extent** of ecosystems and habitats;
3. **condition** of ecosystems and biodiversity, including their structure and functioning; and
4. **connectivity** between and within ecosystems and habitats

As outlined in Figure 2, these four ecosystem attributes and their emergent properties of adaptability, recovery and resistance from pressures and demands are understood to contribute to ecosystem resilience.

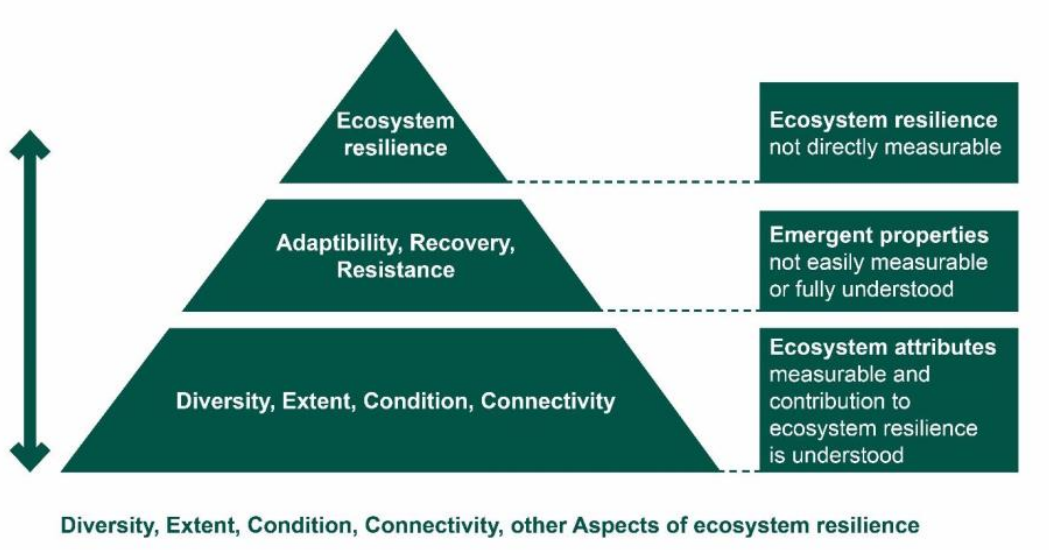


Figure 2. DECCA framework

(Source: Terrestrial and freshwater Resilient Ecological Networks: a guide for practitioners in Wales[Error! Bookmark not defined.])

Metric – Quantitative Data

The Metric calculates the overall loss or gain of biodiversity of development projects by making a comparison between the biodiversity value of habitats present within the Site prior to development (i.e., the 'baseline') and the predicted biodiversity value of habitats following the completion of the development (i.e., 'post-development'). The

comparison is made in terms of 'biodiversity units', with a 'biodiversity metric' providing the mechanism to allow biodiversity values to be calculated and compared.

Though not required as a form of evidence in Welsh planning applications, the Metric offers a robust quantitative assessment of biodiversity impact. With this in mind, a Metric calculation has been carried out to provide supporting evidence for this GIA. This supporting metric calculation can be provided upon request.

Baseline data for the Metric calculation has been informed by habitat condition data that was collected during the surveys associated with the PEA[10], this data is referred to within the PEA report[10]. These surveys took place in February 2023 using Biodiversity Metric 3.1[12], which at the time was the latest available Metric. This condition data has been translated from Biodiversity Metric 3.1[12] to the Statutory Biodiversity Metric[9] to ensure the latest available tools are used to inform this GIA. This survey data determined the Site's baseline area-based and hedgerow habitats; baseline habitats were then digitised in Geographic Information System (GIS) to provide area and length measurements of each habitat type. All baseline habitats were assigned 'Low' strategic significance (SS) because of the Site is not located within a strategically significant location, nor are the habitats present considered to be of particularly high ecological value.

The Landscape Layout Southern Car Park – Drawing Number: ACM-WRE-00-DR-LA-1002 has been used to determine the extent and type of habitats to be retained and created post-intervention. Target condition scores for the proposed habitats were selected in accordance with guidance documents·using professional judgement to ensure the condition scores selected were realistic. The data was utilised to predict the post development biodiversity units. All post-intervention habitats were assigned 'Low' SS, with the same rationale for this as the baseline habitats.

3. Discussion

Baseline Biodiversity

This Section provides a summary of the green infrastructure and biodiversity assets present on the Site; these features are illustrated in Appendix A. Full details are given in the PEA report[10].

Designated Sites

There is one statutory designated site (Gatewen Marsh Site of Scientific Interest), as well as five locally designated sites within two kilometres of the Site (Berse Drelincourt, Moss Valley, Higher Berse Marsh, New Broughton Meadow, Erddig Estate), however, due to the localised nature of the works, no direct or indirect impacts are anticipated to any of these designated sites.

Habitats

The Site is approximately 2,630 m^2 in size and is detailed by the redline boundary shown in Appendix A. These areas comprise mainly of hardstanding (approximately 2,050 m^2), as well as approximately 560 m^2 of the amenity grassland. Small areas of ornamental introduced shrubs are present (roughly 15 m^2 in total) which comprise completely of non-native species. Lengths of species poor intact hedgerows were also present, which were dominated by Beech *Fagus sylvatica*. A total of 23 young standards of hawthorn *Crataegus monogyna*, cockspur hawthorn *Crataegus crusgali*, lime *Tilia x europaea*, and apple *Malus* sp. were present in amongst these hedgerows, however, these have been captured as separate to the hedgerow to appropriately account for any potential losses and retention. In summary, the Site has limited biodiversity value.

The baseline survey assessed a buffer around Site, with an approximate area of 20,000 m^2. This wider survey area is dominated by amenity grassland, with areas of scattered trees present to the north, south and east of the Site. These wider areas are of more value to biodiversity but are still relatively low value; however, these areas are not due to be impacted by the Scheme.

[12] Natural England (2023). Biodiversity Metric 3.1.

Baseline Metric Data

All baseline habitats found on the Site were assessed as being in 'Poor' condition, based on the condition criteria for the relevant habitats. The baseline biodiversity value was calculated as 0.49 units for area-based habitats and 0.24 units for hedgerow habitats. See Table 1 and 2 for details.

Table 1. Baseline Area-Based Habitats

Broad Habitat	Habitat type	Irreplaceable Habitat	Area (m^2)	Distinctiveness	Condition	SS	Habitat Units
Grassland	Modified grassland	No	560	Low	Poor	Low	0.11
Urban	Developed land; sealed surface	No	2,050	V.Low	N/A - Other	Low	0.00
Urban	Introduced shrub	No	20	Low	Condition assessment N/A	Low	0.00
Individual trees	Urban tree	No	930	Medium	Poor	Low	0.37
Total	**-**	**-**	**2,630***	**-**	**-**	**-**	**0.49**

*Individual trees - Urban Tree areas are excluded from total area to prevent double counting of area; however, the unit contributions are included within the habitat unit total.

Table 2. Baseline Hedgerow Habitats

Habitat type	Length (m)	Distinctiveness	Condition	SS	Hedgerow Units
Native Hedgerow	118	Low	Poor	Low	0.24
Total	**118**	**-**	**-**	**-**	**0.24**

Species

Due to the constrained nature of the Site, the habitats present provide very limited habitat provision for protected species. The hedgerows present offer potential habitat for breeding common garden birds, however, beyond that, the habitats present are of low value to protected species.

The wider survey area was identified as being of higher value to protected species, however, as mentioned above, these areas are not due to be impacted by the Scheme.

Post-Intervention Biodiversity

This section provides a summary of the green infrastructure and biodiversity assets proposed as part of the Scheme; these features are illustrated in Appendix B.

Proposed Habitats

The footprint of hardstanding areas is to be increased from approximately 2,050 m^2 to approximately 2,250 m^2, with baseline grassland, hedgerow, and trees in the south of the Site to be lost. This will make way for the proposed EV charging site and associated infrastructure. This loss of grassland habitat is deemed to have a limited impact on the Site's biodiversity value, as this grassland is of low value. It is not proposed that this grassland loss be mitigated for 'like-for-like' and will be compensated for by the proposed green infrastructure discussed below.

The Scheme proposes the removal of 38 m of hedgerows and the removal of 7 small native trees. These impacts are proposed to be mitigated by the creation of 76 m of native hedgerow (hawthorn, blackthorn *Prunus spinosa*, Field Maple *Acer campestre* and Hazel *Corylus avellana*) and 16 trees, all of which are native species (Field Maple, Silver Birch *Betula pendula* and Hazel), proposed to be located in the southern areas of the Scheme. An area of scattered trees is present to the south of the Scheme, which was noted to provide moderate suitability for foraging and commuting bats. The proposed native hedgerows and trees will strengthen this connectivity corridor in the long term.

The proposed plans also include 160 m^2 of introduced shrub planting. Five of the six proposed shrubs are non-native; however, the structural diversity provided by this planting will offer potential for habitats to support a range

of species. The proposed English Lavender *Lavandula angustifolia*, will attract a diverse range of pollinators and insects.

It is proposed that all landscaping (whether retained or created) will adhere to conditions 4, 7 and 8 of the Planning Decision Notice document[13]. These are as follows:

- **Planning condition 4:** The landscaping scheme as carried out in connection with condition no. 3 shall be retained for a minimum of 5 years. Within this timescale, any planting becoming severely damaged or seriously diseased, or is in poor physiological condition and/or are removed without the written permission of the Local Planning Authority shall be replaced with trees or shrubs of similar size and species to those originally required to be planted and within a timescale all to be submitted to and approved in writing by the Local Planning Authority.
- **Planning condition 7:** Within six months of the first use of the development, trees and shrubs shall be planted on the site in accordance with a scheme which has been submitted to and approved in writing by the Local Planning Authority.
- **Planning condition 8:** The existing trees, shrubs and hedges shown on drawing No.60695026/ACM/DDE/WRE/DR/AR/1012/00.6 to be permanently retained shall not be cut down, grubbed out, lopped or uprooted. Any trees, shrubs or hedges removed or being severely damaged or becoming diseased shall be replaced with trees, shrubs or hedging plants of the equivalent size and species.

Post-Intervention Metric Data

All post-intervention habitats have been assigned a target condition in line with best practice. The post-intervention biodiversity value was calculated as 0.55 units for area-based habitats and 0.31 units for hedgerow habitats. See Table 3 and 4 for details.

Table 3. Post-Intervention Area-Based Habitats

Broad Habitat	Habitat type	Retained / Created	Area (m^2)	Distinctiveness	Condition	SS	Habitat Units
Grassland	Modified grassland	Retained	210	Low	Poor	Low	0.04
Urban	Introduced shrub	Retained	10	Low	Condition assessment N/A	Low	0.00
Individual trees	Urban tree	Retained	650	Medium	Poor	Low	0.26
Urban	Introduced shrub	Created	160	Low	Condition assessment N/A	Low	0.03
Urban	Developed land; sealed surface	Created	2,250	V.Low	N/A - Other	Low	0.00
Individual trees	Urban tree	Created	770	Medium	Poor	Low	0.22
Total	**-**	**-**	**2,630***	**-**	**-**	**-**	**0.55**

*Individual trees - Urban Tree areas are excluded from total area to prevent double counting of area; however, the unit contributions are included within the habitat unit total.

Table 4. Post-Intervention Hedgerow Habitats

Habitat type	Retained / Created	Length (m)	Distinctiveness	Condition	SS	Hedgerow Units
Native Hedgerow	Retained	80	Low	Poor	Low	0.16
Native Hedgerow	Created	76	Low	Poor	Low	0.15
Total		**156**	**-**	**-**	**-**	**0.31**

[13] Wrexham County Borough Council (2024). WRO P/2023/0278.

4. Conclusion

Based on the current plans for the Site, the Scheme is predicted to result in a net benefit for biodiversity and thus satisfies Planning condition 10 of Decision Notice P/2023/0278. With this in mind, no additional recommendations are provided.

The proposed increases in tree numbers and hedgerow presence, alongside the proposed areas of introduced shrub planting, outweigh the proposed losses of grassland, trees, and hedgerows. Though the overall footprint, or extent, of the proposed green infrastructure is smaller than the baseline presence, the quality and diversity, both in species and habitat structure, of the proposed habitats are to be improved post-intervention.

The proposed plans for the Site will benefit habitat connectivity in the long term because, once matured, the proposed trees and hedgerows will offer increased habitat connectivity and opportunities for roosts and nests. Similarly, the proposed planting of English Lavender will attract a diverse range of pollinators and insects.

The quantitative Metric assessment that has been carried out to support this GIA provides supporting evidence for the achievement of a net benefit, with predicted increases to the value of area-based and hedgerow habitats of 12.82% and 29.95% respectively (see Table 5).

Table 5. Summary of Results

Habitat Type	Baseline	Post-Development	Total Net Unit Change	Total Net % Change
Area-Based Units	0.49	0.55	+0.06	12.82%
Hedgerow Units	0.24	0.31	+0.07	29.95%

Appendix A Baseline Plan

Revision: 0 Drawn: JW Checked: VC Approved: GCD Date: 2024-05-09



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LEGEND

- NBB Assessment Boundary

UK Habitat

- Urban tree
- Native hedgerow
- Grassland - Modified grassland
- Urban - Developed land; sealed surface
- Urban - Introduced shrub

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ISSUE PURPOSE

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FIGURE TITLE

Baseline Habitat

FIGURE NUMBER

Appendix A

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Appendix B Post-Development Plan

Revision: 0 Drawn: JW Checked: VC Approved: GCD Date: 2024-05-09



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LEGEND

- NBB Assessment Boundary

UK Habitat

- Urban tree
- Native hedgerow
- Grassland - Modified grassland
- Urban - Developed land; sealed surface
- Urban - Introduced shrub
- Northern Car Park Area (Potential for future development)

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FIGURE TITLE

Post Development Habitat

FIGURE NUMBER

Appendix B

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