Green Infrastructure Statement
Land at 24 Salisbury Road Wrexham
For Mr A Saidu

This statement aims to set out the client's approach to the consideration of green infrastructure (GI) in relation to their new development and meet the objectives raised in the revised Chapter 6 of Planning Policy Wales for:



- Green Infrastructure
- Net Benefit for Biodiversity and the Step Wise Approach
- Protection for Sites of Special Scientific Interest
- Trees and Woodlands

The Environment (Wales) Act 2016, provides a context for the delivery of multi-functional green infrastructure. Its protection and provision can make a significant contribution to the sustainable management of natural resources, and in particular to protecting, maintaining and enhancing biodiversity and the resilience of ecosystems in terms of the diversity within and connections between ecosystems and the extent and condition of these ecosystems, so that they are better able to resist, recover from and adapt to pressures. This means that the development of green infrastructure is an important way for local authorities to deliver their Section 6 duty.

Providing green infrastructures offers numerous benefits to the locality, both socially and economically as well as environmental enhancements. The advantages in considering green infrastructure during the development process can benefit flood management, water purification, improved visual aesthetics, reduce noise / air pollution and contribute positively to local climate and wellbeing. Introducing these key changes within urban environments can boost civic pride and improve social interaction and the tranquillity of the spaces.

Green Infrastructures can work towards improving local townscapes in urban environments and generate community opportunities.

It is recognised that all development proposals need to explore a step wise approach when considering green infrastructure, to ensure each development has an environmental net gain.

At 24 Salisbury Road development project, we have undertaken the step approach as follows:

1.
a) The first priority for planning authorities is to avoid damage to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
Where there may be harmful environmental effects, planning authorities will need to be satisfied that any reasonable alternative sites (including alternative siting and design options) that would result in less harm, no harm or benefit have been fully considered.



The proposal is a development is a change of use on land and within a building which has no biodiversity merits. The site is located in an urban location adjacent to areas of housing . The site is level and dominated by traditional street scene.

The development will not damage any existing biodiversity. The scheme therefore poses low or no significance to protected species and habitats and does not offer potential for them.
There are no trees or hedges within the curtilage nor on land adjacent to the site.
On this basis, we feel the proposal does not cause any harmful environmental effect.

b) Proposals in statutory designated sites are, as a matter of principle unacceptable, and therefore,
must be excluded from site searches undertaken by developers. This principle also extends to those sites containing protected species and habitats which are irreplaceable and must be safeguarded. Such sites form the heart of resilient ecological networks and their role and the ecosystem services they provide must be protected, maintained and enhanced and safeguarded

from development. It will be wholly exceptional for development to be justifiable in such instances.

This site is not within any statutory designated area, nor has it any protected species or habitats.

2.
When all locational, siting and design options for avoiding damage to biodiversity have been exhausted, applicants, in discussion with planning authorities must seek to minimise the initial impact on biodiversity and ecosystems by:

- maintaining the largest possible area of existing habitat supporting biodiversity and functioning ecosystems, particularly Section 7 habitats and species where present, by minimising development size and appropriate orientation on site, paying due regard to the potential for continued long term maintenance and management of retained areas to benefit biodiversity.

The site is restricted to 520m2, of which the development footprint occupies 31%. The remaining area will be used for private gardens (20%), parking and turning as required, small front amenity areas and refuse storage.

- ensuring that retained habitats continue to be well connected to adjacent habitats to provide connectivity for key species and ensuring that the favourable conservation status of local species populations is maintained.

There are no habitats on site therefore there is a lack of potential connectivity.



- retaining existing features, develop a management plan for their future care (e.g., trees,
hedgerows, species rich grasslands, heath, wetlands, ponds and freshwater habitats) and use appropriate buffers to protect these from construction and operational impacts.

Any existing soft landscaping features that are adjacent to the site, including trees and hedges are outside the scope of this development's control. The client will promote management for present and future care of habitats and protected species.

- using proven innovative/creative solutions (where required) to minimise damage and maintain existing biodiversity features and ecosystems in tandem with robust monitoring and rectification strategies.

This is not applicable to this scheme as no features will be affected by the proposal.

3.
a) Where, after measures to minimise impact, biodiversity and ecosystems could still be damaged, or lost through residual impacts, the proposed development should mitigate that damage.
Mitigation measures must be put in place to limit the negative effects of a development.

No biodiversity and ecosystem will not be damaged given the existing nature of the site.

b) Effective mitigation or restoration measures should be incorporated into the design proposal following the consideration of steps one and two above. Mitigation or restoration measures must be designed to address the specific negative effects by repairing damaged habitats and disturbed species. They should seek to restore in excess of like for like, accounting for disturbance and □me lags for the recovery of habitat and species, and in every case, mitigation or restoration measures should seek to build ecosystem resilience within the site and where possible the wider area. In some circumstances, where like for like mitigation measures are not possible, particularly in respect of restoration measures, it may be necessary to consider on site compensation measures in the first instance. In designing mitigation measures where uncertainty exists, applicants should follow the precautionary principle and assume a significant effect. Offsite compensation measures (as set out in step four below) should be considered as a last resort.

The proposal will not have any environmental impact given its nature with limited potential for protected species.

4.
When all the steps above have been exhausted, and where modifications, alternative sites,

conditions or obligations are not sufficient to secure biodiversity outcomes further onsite/immediately proximate, and as a last resort off-site compensation for unavoidable damage must be provided. This must be of significant magnitude to fully compensate for any loss. In the absence of a planned approach, compensation measures must be guided by place-based evidence and the onus are on applicants to address the following:



a) Off-site compensation should normally take the form of habitat restoration, or habitat creation,
or the provision of long-term management agreements to enhance existing habitats and deliver
a net benefit for biodiversity. It should also be informed by a full ecological assessment to
establish a formal baseline before habitat creation or restoration starts and secured far enough
in advance before the loss of biodiversity on site.

The proposals do not impact the environment. The scheme brings a currently disused property back into use, and providing much needed HMO housing to the immediate area. Off-site compensation is not required given there will be no damage, together with the environmental gain provided through softer landscaping to amenity areas.

b) The Green Infrastructure Assessment should be used to identify suitable locations for securing off-site compensation. Where possible, a landscape–scale approach, focusing on promoting wider ecosystem resilience, should help guide locations for compensation. The Green Infrastructure Assessment should provide a spatial guide to opportunities already identified for securing a net benefit for biodiversity. Using the assessment will help determine whether locations for habitat compensation should be placed close to the development site, or whether new habitat or additional management located further away from the site would best support biodiversity and ecosystem resilience at a wider scale.

No off-site compensation is required. The retention of existing rear on-site garden area will encourage connectivity with habitats .

c) Where compensation for specific species is being sought, the focus should be on maintaining or enhancing the population of the species within its natural range. This approach might also identify locations for providing species-specific compensation further away from the site. Where they exist, Spatial Species Action Plans should be used to help identify suitable locations.

Some existing native planting exists on-site ,to the rear area which has been designed to ensure it complements the natural range in the immediate area.

d) Any proposed compensation should be place based, take account of the Section 6 Duty (Biodiversity and Resilience of Ecosystems Duty), the DECCA framework and appropriate ecological advice from the local authority Ecologist, NRW and, or a suitably qualified ecologist.

Section 6 has been considered, with the existing biodiversity enhancements on site.

5.
Each stage of the step-wise approach must be accompanied by a long-term management plan of agreed and appropriate avoidance, minimisation, mitigation/restoration and compensation measures alongside the agreed enhancement measures. The management plan should set out the immediate and on-going management of the site, future monitoring arrangements for all secured measures and it should clearly identify the funding mechanisms in place to meet the management plan objectives. The management plan must set out how a net benefit for biodiversity will be achieved within as short a time as possible and be locally responsive and relevant to local circumstances.

As noted, there is an extremely limited opportunity to enhance biodiversity potential on the site. The management of this existing rear lawned and shrub planted area will be down to the building owner.



6.
Finally, where the adverse effect on biodiversity and ecosystem resilience clearly outweighs other
material considerations, the development should be refused.

It is clear the proposal does not have any adverse effect on existing biodiversity or ecosystem resilience and therefore should be considered acceptable.