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RA & CE Platt Limited

By email

DAVY WAY, LLAY – GREEN INFRASTRUCTURE STATEMENT

BACKGROUND

E3P were commissioned by RA & CE Platt Limited to produce a Green Infrastructure Statement at Davy Way, Llay, hereafter referred to as "the site".

The site is located in the north of Llay within Llay Industrial Estate. Davy Way forms the north western boundary of the site, with Rackery Lane running along the north eastern site boundary. Industrial units border the site to the south east whilst a North Wales Police Station borders the site to the south west. The wider area to the north and east is largely agricultural, whilst the south and west are largely industrial and residential. Llay Reservoir is located approximately 40 m east of the site.

Figure 1 Approximate Site Location



The site predominantly comprised two grassland fields bordered by treelines and scrub. The habitats located on site are anticipated to provide foraging and commuting value for local wildlife, including birds and terrestrial mammals, such as bats, badgers (*Meles meles*), and hedgehogs (*Erinaceus europaeus*).

Multiple areas of woodland are present in proximity to the site with the closest located approximately 300 m north east of the site. These woodland habitats are anticipated to support a wide range of flora and fauna including specialist species of invertebrates, fungi, and birds.

A former quarry is located approximately 280 m south of the site which has been colonised by trees and scrub with areas of bare ground and waterbodies also present. This mosaic of habitats may potentially contain Open Mosaic Habitat on Previously Developed Land, due to previous disturbance and modification. As such, if the habitat is present it is anticipated to provide valuable habitat for a variety of fauna, including rich assemblages of invertebrates. The bare ground, scrub and trees are also anticipated to provide habitat for terrestrial mammals, nesting birds, foraging and commuting bats, common amphibians and reptiles.

The wider landscape to the north and east largely comprises a network of agricultural fields interspersed with hedgerows. The fields are anticipated to provide nesting opportunities for ground-nesting birds including skylark (*Alauda arvensis*) as well as providing habitat suitable for brown hare (*Lepus europaeus*). The hedgerows are anticipated to provide suitable foraging and commuting habitat for bats as well as nesting opportunities for birds.

POLICY CONTEXT

NATIONAL PLANNING POLICY

Future Wales: The National Plan 2040

Future Wales is the national development framework for Wales, setting the direction for development to 2040. It sets a strategy for addressing key national priorities through the planning system. Including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

Of particular relevance is Policy 9 (Resilient Ecological Networks and Green Infrastructure). It requires development proposals to demonstrate measures to maintain and enhance biodiversity (to provide a net benefit) and ensure the resilience of ecosystems and green infrastructure assets. Innovative, nature-based approaches must be taken to site planning and the design of the built environment.

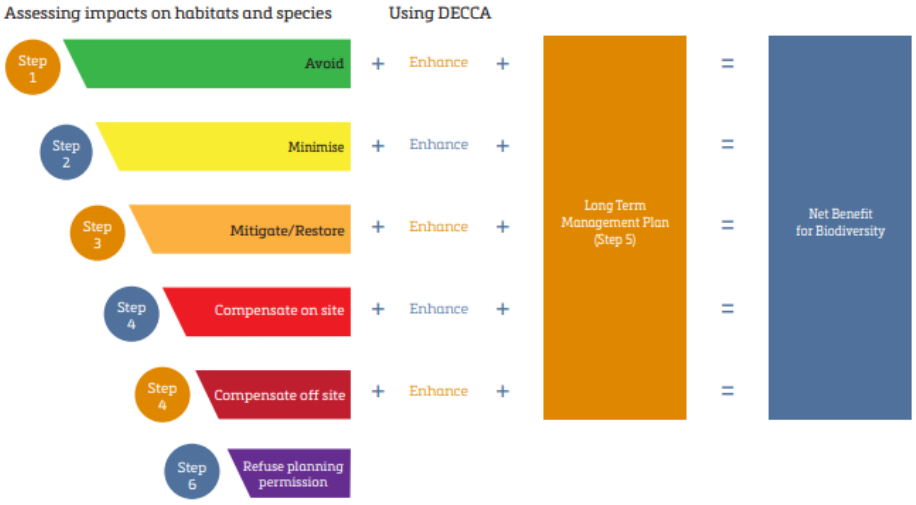
Planning Policy Wales (PPW)

Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. The primary objective is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.

Paragraph 6.2.11 seeks to enhance the quality of the built environment by integrating green infrastructure into development. A green infrastructure statement should be submitted with all planning applications, which is proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. The purpose of this is to be *"an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site… and must be used for demonstrating how the step-wise approach has been applied."*

The PPW goes onto state at paragraph 6.4.11 that planning authorities must follow a step-wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimised, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site over and above that required to mitigate or compensate any negative impact. Paragraph 6.4.12 states that providing evidence in the Green Infrastructure Statement that the step-wise approach has been followed, a scheme of enhancements must be provided to ensure a net benefit for biodiversity.

Figure 12: Summary of the Step-Wise Approach



As set out in paragraph 6.4.37, trees, hedgerows, groups of trees and areas of woodland are of great importance for biodiversity. Planning authorities must promote the planting of new trees, hedgerows, groups of trees and areas of woodland as part of new development. Features of ecological value should be protected. Permanent removal of such features will only be permitted where it would achieve significant and clearly defined public benefits.

Paragraph 6.6.18 requires consideration to be given to the provision of SuDS in the design of new development. Design for multiple benefits and green infrastructure should be secured wherever possible and as part of Green Infrastructure Assessments suitable approaches towards the provision of SuDS should be identified.

LOCAL PLANNING POLICY

Wrexham County Borough Local Development Plan 2013-2028

The Wrexham County Borough Local Development Plan 2013-2028 was adopted on 20th December 2023. A key issue set out within the Local Plan is the need to balance housing and economic development while maintain and enhancing local biodiversity / geodiversity, landscape and tree conservation interests.

Of particular relevance, Policy SP19 (Green Infrastructure) requires development to maintain the extent, quality and connectivity of multi-functional green infrastructure on or near a site. The policy seeks to, where appropriate, enhance it by creating new interconnected areas of green infrastructure between the proposed site and the existing network; protect the features most valuable for both nature and people; and in instances where loss in unavoidable, provide mitigation and compensation for the lost assets on a site-specific basis.

EXISTING GREEN INFRASTRUCTURE (ECOLOGY)

Surveys have been carried out to confirm the green infrastructure features in relation to ecology at the site and its surrounding context comprising a Preliminary Ecological Appraisal and Great Crested Newt eDNA Surveys. The Preliminary Ecological Appraisal of the site was undertaken by E3P, on 04th September 2024.

The majority of the site comprised a large other neutral grassland field, with a smaller field present in the north-west of the site. The grassland comprised a range of grasses and herbaceous species with occasional sedges also recorded in damp areas of the grassland. Species within the grassland included perennial rye-grass (*Lolium perenne*), Yorkshire fog (*Holcus lanatus*), false oat grass (*Arrhenatherum elatius*), creeping bent (*Agrostis stolonifera*), compact rush (*Juncus conglomeratus*), creeping buttercup (*Ranunculus repens*), silverweed (*Potentilla anserina*), curled dock (*Rumex crispus*), tufted hair grass (*Deschampsia caespitosa*), gypsywort (*Lycopus europaeus*), creeping cinquefoil (*Potentilla reptans*), soft rush (*Juncus effusus*), meadow vetchling (*Lathyrus pratensis*), jointed rush (*Juncus articulates*), and selfheal (*Prunella vulgaris*).

The grassland areas were bounded by three treelines largely dominated by pedunculate oak (*Quercus robur*), whilst the remaining boundaries of the field were made up of mixed scrub which also formed the understorey of the treelines.

An area of broadleaved woodland was located within the centre of the site and extended towards the south eastern boundary. The woodland was dominated by grey willow and goat willow (*Salix caprea*) with mature pedunculate oak (*Quercus robur*) also present. A waterbody was also present within the woodland, with a second waterbody located in the northern corner of the site, which was dry during the Preliminary Ecological Appraisal.

Great Crested Newt eDNA surveys were undertaken on the waterbodies on-site during 2024 and returned negative results for the presence of great crested newts (*Triturus cristatus*). Three waterbodies located off-site were assessed as having potential for great crested newts and the terrestrial habitats on-site have suitability for foraging, shelter and hibernation.

With regards to other protected species, the habitats on-site were assessed as having suitability for foraging and commuting bats, whilst the scrub, woodland and treelines provide suitable habitat for nesting birds.

The grassland, woodland, scrub and treelines were also assessed as having suitability for badgers, hedgehogs, common amphibians and reptiles.

Figure 2 UK Hab Plan of On-Site Habitats



GREEN INFRASTRUCTURE STATEMENT (ECOLOGY)

The Green Infrastructure Statement details the effects of mitigation of the individual green infrastructure components, which has informed the preparation of the parameters plan for the site and the indicative landscaping strategy. This is with a view to minimising any negative impacts on biodiversity as far as possible and deliver a net benefit in biodiversity in accordance with national planning policy. The indicative landscaping strategy will inform the development of detailed landscaping proposals, which will be subject to future reserved matters approval.

The Preliminary Ecological Appraisal sets out a series of recommendations for the individual green infrastructure on-site including treelines, woodland, waterbodies and protected species. Informed by the submitted Arboricultural Impact Assessment (prepared by Tree Solutions), the scheme has been designed to avoid locating development on the existing tree corridor (in accordance with Step 1: Avoid) so that these trees, running north-east to south-west through part of the site, can be retained on-site. Consideration has also been given to protecting the root protection areas of these trees to ensure their long-term health.

The parameters plan identifies a large area of landscaping defined by Davy Way to the north-west and this linear tree corridor. This landscaped area at the entrance into the site from Davy Way will help to provide suitable visual screening to the development. This area will deliver an attractive and high-quality landscape setting that will help to better integrate the scheme into its surroundings and provide a suitable transition to the open countryside beyond Rackery Lane. It is envisaged at this stage that this area will incorporate a range of native and non-native plant species, grasses and shrubs as well as planted SuDS features within and surrounding the drainage features to collectively deliver biodiversity and drainage benefits. The scheme will be developed to create species diversity whilst enhancing the biodiversity value on-site. Additionally, the proposals will deliver an attractive environment to promote the wellbeing of future employees. The exact species to be delivered will be determined at reserved matters stage.

Other trees and existing woodland will be retained and protected where possible, however like-for-like replacement will be sought to mitigate any loss of landscape features as a result of the development in line with step 3 (mitigate / restore) and step 4 (compensate on-site) of the step-wise approach.

The parameters plan has also been designed to deliver a series of enhanced landscape corridors that run along the site's boundaries. Therefore, development will be directed away from the site boundaries in accordance with Step 1: Avoid. These corridors will help to improve connectivity for wildlife between the adjoining areas of green infrastructure, located adjacent to the site's southern boundary and to the south-east beyond the North Wales Police Headquarters.The green infrastructure recommendations are in line with Step 2: Minimise, Step 3: Mitigate, Step 4: Compensate, of the Step-Wise Approach.

With regard to protected species, the Preliminary Ecological Appraisal sets out recommendations, including the requirement that measures be taken to prevent harm to common amphibians, badgers and reptiles through the implementation of Precautionary Working Methods. These Precautionary Working Methods are in line with Step 2: Minimise and Step 3: Mitigate, of the Step-Wise Approach. In addition, recommendations for checks of vegetation during any clearance to prevent harm to hedgehogs and nesting birds have been proposed. Furthermore, a bat lighting strategy has been recommended to prevent the fragmentation of bat foraging and commuting routes through the site.

A series of enhancements have been detailed with the Preliminary Ecological Appraisal including the installation of bat and bird boxes on retained mature trees, the installation of hibernacula for amphibians and reptiles, and hedgehog houses across the site. These green infrastructure enhancements are in line with Step 4: Compensate on site, of the Step-Wise Approach.

Yours sincerely,
For and on behalf of E3P Ltd

Huw Morgan
Principal Ecologist