BRYMBO METHODIST CHURCH AND ENGEDI CHAPEL, BRYMBO

GREEN INFRASTRUCTURE STATEMENT

Llys Garth
Garth Road
Bangor
Gwynedd
LL572RT
01248 351541

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1. INTRODUCTION

1.1 This Green Infrastructure Statement has been produced by Enfys Ecology for Wales & West Housing and provides a brief statement associated with the proposed development of the site at Brymbo Methodist Church and the adjacent Engedi Chapel. The proposed works are for the demolition of the two buildings, which are to be replaced with two apartment buildings, parking areas, access road and landscaping.

1.2 Green infrastructure (GI) is defined in Planning Policy for Wales (PPW) Edition 12[1] as "*the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places*". Development proposals should take GI into consideration in order to avoid negative impacts on habitats and species, and seek ways to maintain and enhance biodiversity. Impacts on habitats and species should be treated in a step-wise manner (PPW 12, paragraph 6.4.15), by seeking to:

- **Avoid** damage to biodiversity in its widest sense by maintaining the largest possible area of existing habitat supporting biodiversity and functioning ecosystems, particularly Section 7 habitats and species where present, through careful development design and consideration of long-term maintenance and management and ensuring that retained habitats continue to be well connected to adjacent habitats to provide connectivity for key species.

- **Mitigate** or **restore** by identifying measures to address the specific negative effects by repairing damaged habitats and disturbed species. The measures should seek to restore in excess of like for like, accounting for disturbance and time 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.

- 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.

- 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).

[1] See: https://www.gov.wales/planning-policy-wales

1.3 The Wrexham Local Development Plan (LDP) 2013 – 2028 and Local Planning Guidance Notes provide relevant information associated with biodiversity and green infrastructure in Wrexham Borough County Council area:

- WCBC LDP 2013-2028 Policy SP5: Planning Obligations
- WCBC LDP 2013-2028 Policy SP12: Design Principles & Masterplanning Framework
- WCBC LDP 2013-2028 Policy SP14: Natural Environment
- WCBC LDP 2013-2028 Policy SP19: Green Infrastructure
- WCBC LDP 2013-2028 Policy NE1: International and National Nature Conservation Designations
- WCBC LDP 2013-2028 Policy NE2: Local Designations for Nature Conservation and Geological Importance
- WCBC LDP 2013-2028 Policy NE3: Trees, Woodlands and Hedgerows
- WCBC LPG Note No 7 – Landscape and Development.
- WCBC LPG Note No 17 - Trees and Development.
- WCBC LPG Note No 26 - Landscape and Industrial Developments.
- WCBC LPG Note No 32 – Biodiversity and Development.
- WCBC LPG Note No 35 – Great Crested Newt Mitigation Requirements Johnstown Newt Site SAC and the Wider Countryside.

2. Site Details

2.1 The site comprised Brymbo Methodist Church and the adjacent Engedi Chapel, located within the residential area of Brymbo, Wrexham.

2.2 Brymbo Methodist Church comprised a single storey, brick-built building with a slated roof at the southern end of the site, and to the north, was Engedi Chapel, comprising a stone-built chapel and a brick built former school house.

2.3 The proposed works are for the demolition of the two buildings which are to be replaced with sixteen flats within two apartment buildings, parking areas, access road and landscaping.

2.4 The reports / drawings reviewed in the production of this Green Infrastructure Statement are detailed in Table 2.1.

Table 2.1: Project Information Sources

Information	Organisation	Reference and Date
Preliminary Roost Assessment and Emergence Surveys	Enfys Ecology	EE.4159.23.LB - Brymbo Methodist Church & Engedi Chapel - PRA & Emergence Surveys V2 28.02.2024
Bat Mitigation Strategy	Enfys Ecology	EE.4159b.24.LB Brymbo Church & Engedi Chapel Bat Mitigation Strategy 28.02.2024
Proposed Elevations	Creu Architecture	Creu-C484-013-E-Proposed Elevations 01 30.11.2023
Lighting Plan	Thorlux Lighting	Drawing No.577649-00

3. Site Baseline and Connectivity

The site is located within the residential area of Brymbo village (see Figure 3.1). The site had good connectivity with an area of woodland, approximately 20m to the west of Engedi Chapel, which ran southwards connecting to further areas of woodland and hedge and tree lined fields to the south.

The area immediately surrounding Engedi Chapel was overgrown with young trees including ash, silver birch, scrub and tall ruderal vegetation, particularly to the east of the former school house and the narrow area immediately to the south and west of the former school building.

Bat surveys undertaken by Enfys Ecology in 2023, found Brymbo Methodist Church to be a historic roost of a single crevice dwelling bat, which is unlikely to return. Engedi Chapel was found to be a day and night roost for approximately 15 lesser horseshoe and individual/low number of common pipistrelle, soprano pipistrelle, brown long-eared and *Myotis* sp.

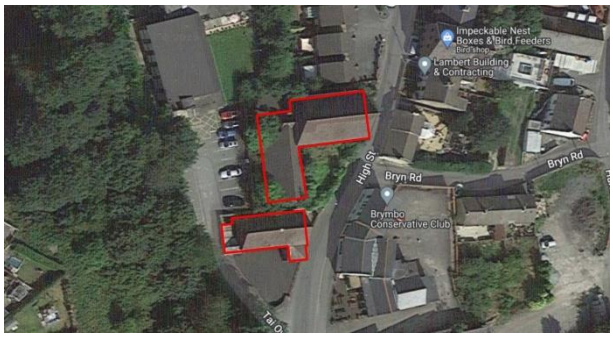


Fig. 3.1: Site Context
Background Image © Google Maps 2024



Fig. 3.2: Site Context
Background Image © Google Maps 2024

There is no public access or footpaths within the site, however there is a footpath, which runs along the small road along the site's western boundary (Tai Owain), providing a link for pedestrians from High Street to the east, to Pen Y Graig Road to the west.

There are no blue infrastructure resources (rivers, streams, ditches or other watercourses) within or adjacent to the property. As the site comprises two former church and chapel buildings, there are current connections to the local foul and surface water systems.

4. Summary of Green Infrastructure Proposals

As set out in PPW 12, paragraph 6.4.21, the impacts on habitats and species from a proposed development should be treated in a step-wise manner. Table 4.1 summarises how the proposed works at Brymbo Methodist Church and Engedi Chapel has adopted these step-wise principles and details the Green Infrastructure contribution of the proposed scheme. The Green Infrastructure contribution proposed is considered to be proportionate to the proposed development.

TABLE 4.1: SUMMARY OF GREEN INFRASTRUCTURE PROPOSALS FOR BRYMBO METHODIST CHURCH AND ENGEDI CHAPEL, BRYMBO

Step-Wise Stages	Summary of Project Proposals
Avoidance	• Engedi Chapel is currently in a state of disrepair and is structurally unstable. It would be economically unviable to retain and repair the building and the bat roosts within. If the development were not to go ahead, it is very likely that there would be further damage to the building and the roosts would be lost.
Mitigation	*Destructive Works* • Mitigation with regard to the destructive works are detailed in the Bat Mitigation Strategy (Enfys Ecology, 2024) and includes requirements for the timing of works, a tool box talk, method of works, pre-work checks and supervision. *Pre-construction – Temporary Roost* • A temporary bat roost will be built at the southern end of the site prior to the demolition of the buildings and destruction of the existing roosts. The temporary bat roost will be based on a 'tower' design by Vincent Wildlife Trust (VWT), specifically for lesser horseshoe bats. Roosting opportunities within the 'tower structure' and bat boxes will also be provided for crevice dwelling bats. *Lighting* • The entrances to the temporary roosts (bat tower and bat boxes), the new permanent roost entrances and the woodland edge to the west of the site will be kept as dark as possible. There will be 'darker corridors' from the roost entrances and along the western site boundary to the woodland to the west *Birds* • No evidence of nesting birds was found during the works; however, the site is suitable. If the area of works has potential for nesting birds, a nesting bird check must be carried out no less than 48 hours before works commence. If birds are found nesting in the buildings or vegetation during any point in the works, all works to that area must stop and only continue once the chicks have fledged.
Compensation	• Two large compensatory roosts will be created within the roof voids of the two apartment blocks (one within each apartment block), that will be designed to meet the needs of a wide variety of bat species present in the area. Other external roosting opportunities will be created for crevice dwelling bats. • To compensate for the loss of potential bird nesting habitat and enhance the site for birds; four in-built bird boxes will be incorporated into the apartment blocks.
Enhancement	• There will be planting across the site to provide cover and foraging opportunities for bats.

5. STATEMENT

The proposed development at Brymbo Methodist Church and Engedi Chapel will result in sixteen flats within the two apartment buildings, which will supply much needed affordable housing to the area. The scheme has been designed taking a step-wise approach to impacts on habitats and species, and ecological enhancement will be provided through the creation of two large bat roosts and other roosting opportunities for a range of bat species, that will be maintained in the long term.

Planning Policy Wales identifies the importance of "*paying due regard to the potential for continued long term maintenance and management of retained areas to benefit biodiversity*" (PPW12, paragraph 6.4.15). As a bat licence will be required, the licence conditions and required monitoring under the licence, will ensure the future maintenance and management of the site and compensatory and enhancement measures.

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