Title	**Proposed Demolition of Greenacres, Rhosddu Road, Wrexham – Biodiversity Statement**
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Client	**Wrexham County Borough Council**
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1 Introduction

Background

1.1 It is proposed to demolish Greenacres, Rhosddu Road, Wrexham (Approximate OS Grid Ref. SJ 3322 5108). This Statement is provided as supporting information to the submission of a 'Notice of Intended Demolition' (*Building Act 1984*, *Sections 80-83*).

1.2 The ecology survey and reporting requirements have been discussed with Wrexham County Borough Council's (WCBC) Ecology and Biodiversity Officer. It was agreed that a bat Preliminary Roost Assessment (PRA)/ nesting bird assessment and a Biodiversity Statement should be submitted with the application. The PRA is provided as a separate standalone report. The PRA should be consulted for details of proposed bat and nesting bird mitigation/ compensation measures. This Biodiversity Statement largely considers enhancement measures only.

1.3 At the present time the future site disposal plans are not known. This Biodiversity Statement considers required enhancement measures in relation to the proposed demolition only. Measures to offset the loss of small areas of grassland and possibly trees, *etc*, will therefore need to be considered when a plan for the site is brought forward in the future.

1.4 This Biodiversity Statement includes the following:

1. A brief description and assessment of the existing habitat immediately around the building.
2. Identification of locations and opportunities for potential ecological enhancements.
3. Consideration of the potential for off-site provision at Rhosddu Park.
4. Demonstration of how net benefit for biodiversity (and ecosystem resilience) will be secured and maintained. Full details of the recommended ecological enhancements.
5. Reasonable Avoidance Measures with regards nesting birds and Hedgehogs.

1.5 This document has been produced by Marches Ecology to provide the above information.

Site Description

1.6 A site visit was undertaken on 5th February 2024 by Tom Knight of Marches Ecology. The weather during the visit was sunny spells with 20% white/ grey cloud cover and a strong breeze. One of the purposes of the visit was to broadly characterise the existing ecological resource and vegetation/ habitat immediately around the building. An Extended Phase 1 Habitat Survey or other similar ecological survey has not been undertaken. The brief description provided here is based entirely on information collected during the site visit.

1.7 The existing building is located in Rhosddu just to the northwest of the centre of Wrexham. It is an urban location being surrounded by a range of residential and commercial properties, along with roads including Rhosddu Road to the northeast.

1.8 The northern section of the existing Greenacres building has two storeys. That is approximately a sixth or seventh of the building by area of footprint. The remainder of the building is single storey. It has an irregular shape with four or five linked sections. The roof is flat and laid with bitumen felt with various skylights. The lower part/ ground floor of the elevations is constructed with exposed brick. The first floor/ wall-top has white plastic cladding.

1.9 Greenacres is largely bounded by areas of tarmac hard-standing including car parking and internal service roads. There are small patches of amenity grassland scattered around the building and the edges of this hard-standing, and some raised planters. There are two semi-mature/ mature trees located to the northeast and a small number of further trees scattered around the car park to the southwest and near the Cunliffe Centre. There is a very large, mature *Quercus robur* (Pedunculate Oak) to the north of the Cunliffe Centre.

1.10 Some of the amenity grassland is infrequently managed or unmanaged. The grassland to the northeast of the building is dominated by *Lolium perenne* (Perennial Rye-grass) with frequent *Taraxacum officinale* (Dandelion), locally frequent *Festuca rubra* (Red Fescue), *Achillea millefolium* (Yarrow), occasional *Plantago lanceolata* (Ribwort Plantain) and *Ranunculus repens* (Creeping Buttercup). The sward varies between 0.1-0.2 m high.

1.11 There is a strip of species-poor unmanaged grassland to the southeast of the building. It contains frequent *Dactylis glomerata* (Cock's-foot), *Arrhenatherum elatius* (False Oat-grass) and *Agrostis stolonifera* (Creeping Bent). The sward varies between 0.3-1 m high. There are some patches of *Urtica dioica* (Common Nettle), a brash pile and dense *Hedera helix* agg. (Ivy) on the fence.

1.12 There is a strip of unmanaged species-poor grassland, tall ruderals and scattered shrubs along the southeast edge of the car park to the southwest of the building. This vegetated strip contains several trees including a large *Acer pseudoplatanus* (Sycamore). There are also accumulated leaves and several piles of brash/ rubbish.

1.13 One of the walled planters on the northeast side of the building contains a multi-stemmed *Aesculus hippocastanum* (Horse-chestnut), *Prunus* sp. and *Rubus fruticosus* agg. (Bramble). There is a lot of accumulated leaves, rubbish and brash in the bottom. Two old bird nests are present: likely to be Blackbird (*Turdus merula*).

1.14 The Cunliffe Centre is a similar building to Greenacres although it includes a tall 'chimney' structure.



Northeast elevation of Greenacres.



Amenity grassland to the northeast of Greenacres.



Walled planter on the northeast side of Greenacres.



Southwest elevation of Greenacres.



Unmanaged grassland and brash pile to the southeast of Greenacres.



Strip of unmanaged grassland, scattered shrubs and trees on southeast side of car park to the southwest of Greenacres.

Rhosddu Park

1.15 Rhosddu Park is located approximately 120 m to the south of Greenacres. It is bounded by roads on three sides including Rhosddu Road to the northeast. The Park is characterised by regularly managed amenity grassland. At the time of the survey visit the sward was approximately 0.1 m high. It is species-poor and dominated by Perennial Rye-grass.

1.16 There are lines of semi-mature/ mature Sycamore and *Tilia* sp. (Lime) trees around the northern, eastern and southern boundaries. Scattered trees are located elsewhere.



View of Rhosddu Park from close to eastern corner looking towards southwest end.



The southwest end of Rhosddu Park.



Some of the trees along the southeast boundary.

The Proposal

1.17 It is proposed to demolish the existing Greenacres building.

2 Biodiversity Enhancement

Introduction

2.1 Technical Advice Note 5 (Nature Conservation and Planning) (Welsh Assembly Government, 2009)[1] and Wrexham County Borough Council (2011)[2] seek developments to achieve net biodiversity gain. The requirement to secure and maintain net benefit for biodiversity (NBB) (through enhancements) was reinforced in a letter issued by the Chief Planner (Welsh Government) to all planning departments in October 2019. NBB has been defined as '*the concept that development should leave biodiversity and ecosystems in a better state than before, through securing long term, measurable and demonstrable benefit, primarily on site*.'[3]

2.2 This was reiterated in a letter from the Minister for Climate Change to the Heads of Planning dated October 2023. An Annex[4] attached to this letter provided text to update Planning Policy Wales (PPW). Subsequently, Chapter 6 of PPW has been updated as of 11/10/23 which provides '*further clarity .... on securing net benefit for biodiversity through the application of the step-wise approach, including the acknowledgement of off-site compensation measures as a last resort, and, the need to consider enhancement and long-term management at each step.*'

2.3 WCBC (2011) lists '*examples of how enhancements could be achieved on development sites*'. The options provided include planting native trees of local provenance. CIEEM (2022) states that '*a key requirement is that the measures put forward are suitable in the local context of the site*'[5]. As future plans for the wider site at Greenacres are currently not known it is deemed more appropriate to provide the NBB measures in Rhosddu Park. It is proposed to plant a small number of native trees and plant some bulbs.

2.4 It is proposed to plant nine *Sorbus aucuparia* (Rowan) trees. The fruit on these trees will provide a potential food source for priority species such as the Song Thrush (*Turdus philomelos*). The flowers also provide a potential source of nectar for insects.

2.5 The trees would be under-planted with spring- and autumn-flowering Crocus bulbs to provide a possible source of nectar for pollinating insects.

[1] Welsh Government (2009). *Planning Policy Wales - Technical Advice Note 5: Nature Conservation and Planning*. September 2009.

[2] Wrexham County Borough Council (2011). *Local Planning Guidance Note 32 Biodiversity and Development*. Adopted March 2011.

[3] https://www.gov.wales/targeted-policy-changes-planning-policy-wales-net-benefit-biodiversity-and-ecosystems-resilience

[4] *Annex to Heads of Planning Letter Dated 11 October 2023: Addressing the Nature Emergency through the Planning System: Updated National Planning Policy for Chapter 6 of Planning Policy Wales*.

[5] CIEEM (2022). *Welsh Government's Approach to Net Benefits for Biodiversity and the DECCA Framework in the Terrestrial Planning System. CIEEM Briefing Paper September 2022*. CIEEM, Romsey.

Assessment of Required Level of Provision

2.6 Demolition of the existing building can be categorised as a small/ low impact proposal. It is largely surrounded by hard-standing with some small fragments of amenity grassland/ unmanaged species-poor grassland. This grassland is of low ecological value. The building is not connected to any other habitat types, and is not close to other valued ecological resources. It is assumed that all of the existing trees would be retained unaffected.

2.7 The bat PRA report concluded that the Greenacres building is not of particular potential value for (roosting) bats or nesting birds. The loss of this building would not result in a significant impact on any valued ecological resource at this location. NBB provision '*should be proportional to the extent and impact of development*' (CIEEM 2022). The proposed enhancements will therefore target a priority species likely to be present in the area as well as increasing the biodiversity value of a local park.

Biodiversity Enhancement Recommendations

Planting Native Trees

2.8 A cluster of nine *Sorbus aucuparia* (Rowan) trees will be planted towards the southwest end of Rhosddu Park in an area of existing amenity grassland.

2.9 The Rowan trees can be sourced from the Woodland Trust[6]. The Woodland Trust website confirms that all of their trees are sourced and grown in the UK. If vandalism may be an issue, then larger tree specimens may be required and/ or metal tree guards considered. The trees will need to be staked and fitted with strimmer guards[7].

2.10 The trees should be checked annually by Wrexham County Borough Council. Any losses will be replaced. Some maintenance including possibly watering, may need to be undertaken during establishment.

2.11 The trees will be planted between November and March. They will be planted in accordance with the advice provided by the Woodland Trust[8].

Planting Crocus Bulbs

2.12 The proposed trees will be under-planted with spring- and autumn-flowering Crocus. The spring-flowering Crocus would be *Crocus tommasinianus* (Early Crocus)[9]. Seventy-five bulbs will be planted. This Crocus flowers from February to March and will provide an important food source for early-flying insects.

2.13 The autumn-flowering Crocus would be *Crocus speciosus* (Autumn Crocus)[10]. Ninety bulbs will be planted. This Crocus flowers from September to November and provides late foraging bees with an additional food source.

2.14 The bulbs should be planted in naturalistic drifts beneath the trees at a depth of approximately 5-10 cm with the shoots facing upwards. Individual bulbs should be at least 7-8 cm apart. Planting should be undertaken between early September to November. This

[6] https://shop.woodlandtrust.org.uk/rowan

[7] https://www.green-tech.co.uk/tree-planting-products/tree-protection-and-shelters/premium-strimmer-guards

[8] https://www.woodlandtrust.org.uk/plant-trees/advice/how-to-plant/

[9] https://www.crocus.co.uk/plants/_/crocus-tommasinianus/classid.1000000372/

[10] https://www.crocus.co.uk/plants/_/crocus-speciosus/classid.1000000347/

could be undertaken in conjunction with school children/ the local community. First flowering would be in the following year.

2.15 The grass should not be cut until the Crocus leaves have died back. The planted area will need to be defined with some kind of marker posts to minimise the possibility of inadvertent mowing. The grass in the planted area will need to be cut when the Crocus plants have died back, *e.g.* during the summer.

2.16 If Squirrels become a problem (eating the bulbs) chicken wire may need to be installed over the bulbs. This would also prevent dogs from digging them up.

Maintenance and Monitoring

2.17 The importance of securing long-term management/ maintenance and monitoring is central to the NBB approach (*e.g.,* CIEEM 2022). This should also be proportional to the scale and impact of the development.

2.18 The newly planted trees and Crocus bulbs should be checked annually by Wrexham County Borough Council as part of the ongoing maintenance of Rhosddu Park. The trees may need some aftercare until they are properly established and any losses will be replaced. The Crocuses are unlikely to require aftercare other than the implementation of an appropriate mowing regime. The installation of chicken wire to protect the bulbs should also be considered.

3 Reasonable Avoidance Measures

Nesting Birds

3.1 Two old bird nests (likely to be Blackbird) were noted in the walled planter on the northeast side of the building. This feature is likely to be impacted during the proposed demolition works. The risk that any active nests may be present during the demolition works is considered to be low but cannot be entirely ruled out.

3.2 If the proposed demolition proceeds during the bird nesting season (March to August inclusive) a precautionary approach should be adopted. All features within, or in close proximity to, the proposed demolition site should be checked by a suitably qualified ecologist prior to commencement of any works.

3.3 Should any occupied nests be found at this time or during the works, a buffer zone (determined on the basis of the species concerned and the location of the nest in the context of the surrounding vegetation, but no less than 5 m) would be retained until it can be ascertained that the chicks have left the nest. The buffer zone will be appropriately fenced and signed. This accords with the recommendations of the PRA report.

Hedgehog

3.4 A Hedgehog was found in leaf litter beneath Bramble during the vegetation clearance and associated hand-searches for this species conducted prior to the demolition of the Centre 67 building. Greenacres is adjacent to the Centre 67 plot and Hedgehogs are known to be present in the area.

3.5 There are less features of potential value for Hedgehogs around Greenacres, than there were around Centre 67. However, due to their known presence a precautionary approach should be adopted.

3.6 Prior to the commencement of site clearance/ demolition works all features within, or in close proximity to, the proposed demolition site should be checked by a suitably qualified ecologist. Hand-searches will be undertaken as necessary. This is likely to include features such as the walled planter on the northeast side of the building and the brash pile to the southeast of the building.

3.7 Any Hedgehog that may be found (when not hibernating) would be moved to a similar, safe location within suitable habitat nearby. Ideally, this work should not be undertaken within the hibernation period (October/ November to March/ April). However, if it is necessary to undertake the work at this time periods of cold weather should be avoided. Should a hibernating Hedgehog be found, it should be covered back up and left where it is until the end of the hibernation period.