P/2024/1285 – Response to NRW & WCBC

This letter sets out a response against comments made by NRW and WCBC's Ecologist on the above application. It is included alongside updated drawings provided by Nicholsons & Tier Consult.

In summary, the submitted drawings present a landscaping scheme which is a demonstrably better solution from an ecological and landscape perspective than the original submission.

Regularising the profile of the existing bunding will provide a solid basis for an adjusted planting palette on the eastern and western bund slopes. Angles of slopes will be at maximum 1:2.5 gradient (improved from a maximum of 1:1 gradient in places) to follow the natural angle of repose for unsupported topsoil. The planting approach takes into account the aspect of the bund slopes and the required nutrient levels for the type of planting proposed on those slopes. A total of 82 trees are proposed.

Eastern boundary proposals

The originally submitted drawings featured proposed thicket mix planting (300mm depth of top soli onto 600mm depth subsoil) and extra heavy standard trees (14-16cm gith, 4.25,-6.0m height) on top of the southern end of the bund. A wildflower mix was proposed throughout.

The new proposals include a native thicket (scrub) mix planted as whips/transplants (60-90cm height) with 2 different sizes of standard tree planted within the 1.5m grid to provide a mixed height native planting matrix.

Larger canopy species will be planted at the lower parts of the bund slopes in positions where the existing offsite large hedgerow species have gaps. Medium and smaller canopy trees and feathered species are to be planted at higher positions within the slopes, to provide ground stabilisation and visual screening following establishment. This is to provide clumps of larger canopy trees within the site periphery to follow the landscape character of the surrounding area with its large Oak trees and similar local species.

Western boundary proposals

The originally submitted drawings followed the same approach for this boundary as the eastern boundary described above.

The new proposals include 'nutrient-poor' subsoils to be used in the regraded areas to provide the required conditions for the establishment of species rich wildflower meadow. The meadow grass species mix follows the ecological recommendations for the site for the

open areas and aquatic margins to the ponds. Various habitat creation elements have been included such as log piles, bare earth scrapes for butterfly and bee habitats, amphibian hibernacula and rock piles.

A native hedge has been included towards the centre of the boundary area which runs on the north-south axis to connect the existing hedgerow to the north to the Wrexham Industrial Estate Strategic Ecological Network to the south.

Comments	Response
WCBC Ecologist	
The submitted management plan doesn't appear to fit the revised landscape layout either and this will require amending.	TEP have updated this document to reflect the proposed drawings
***Bunding** - Given the material, height of the bund and gradient it is ridiculous to suggest that a wildflower mix will be created and retained on them. Existing weed growth demonstrates the fertility of the soil, and ongoing management to reduce fertility and the existing seed bank on the current slopes will not be possible. Establishment of trees will also require modification of the bund and a more specialist planting plan. If the bunds were reduced in height and gradient and then planted entirely with suitable trees they may be acceptable, but not in their current form.*	Bund reprofiled allowing for an overall reduction in height and aggregation, maximum gradient reduced to 1:2.5 from 1:1. Wildflower meadow now only proposed for western elevation and new proposals will include nutrient-poor' subsoils to be used in the regraded areas to provide the required conditions for the establishment of species rich wildflower meadow The planting approach takes into account the aspect of the bund slopes and the required nutrient levels for the type of planting proposed on those slopes, including the selection of tree species. A successful outcome from planting trees on this gradient has been achieved on other Nicholson's projects.
***Loss of hedgerow which was to be retained** – 2 lengths of hedgerow running N-S on the Ridley Wood Road were due to be retained but have been removed. These need replanting with mixed native species.*	A replacement, native hedgerow is now proposed, running north-south. This is a double-staggered row with a length of 376m, compared to the two original hedgerows which were 104m
***Wildflower meadow** – the only area which looks capable of sustaining a wildflower meadow is the area adjacent to Ridley*	See above for approach on wildflower meadow which is seen as appropriate and deliverable.

Comments	Response
Wood Road or around the carpark. However it is not proposed as such.	
Lack of large trees *– there is a general lack of large long-lived tree species in the planting plan. The area is known for its mature and distinctive oak trees, more of these should be included.*	The planting plan now includes 45 heavy standard trees, including 12 "quercus robus (pendunculate oak)" trees.
This site has been subject to a European Protected Species Licence due to the presence of great crested newt on the application site. The site therefore has an agreed management plan secured by the licence and a Section 106 agreement.	The previously submitted management plan has been updated to reflect the current proposals which represent an improvement in ecological value for the Site.
NRW	
The current revised landscaping proposals do not include a series of ponds or woodland blocks. Consequently, we are of the view that the revised proposals do not accord with the obligations under the Section 106 Agreement or the requirements of the European protected species licence numbers S088525-1, S088525-2, and S088525-3	The previous proposed ponds on site have been retained, with supporting hibernaculum and rock piles proposed within the landscaping scheme. A total of 82 trees have been proposed within the landscaping plan, across the entire bund. These have been selected with regard for the aspect of the bund slopes and the required nutrient levels required. It is considered that this constitutes a woodland block. The Applicant is developing a strategic approach for ecology that will complement these proposals and their wider portfolio of sites, delivering a greater ecological benefit for the wider Wrexham Industrial Estate.