Title	**Change of Use of Land for Use as a Forest School and Erection of Fencing, St. Giles Primary School, Madeira Hill, Wrexham, LL13 7HD – Biodiversity Statement**
Date issued	**11th March 2025**
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Client	**St. Giles' CiW Primary School**
Report Version	**C568/ Biodiversity_Statement/ 1.0**

1 Introduction

Background

1.1 St. Giles Primary School has received planning consent (Ref. P/2024/1063) for the change of use of land for use as a forest school and the erection of fencing on land off Madeira Hill, Wrexham (Approximate OS Grid Ref. SJ 3352 4992). The forest school area is located immediately to the northeast of the existing school and will form part of the education facilities at this site.

1.2 The planning consent is the subject of six planning conditions. Condition 6 is as follows:

'*Prior to the first use of the land for the purpose hereby permitted, a scheme of measures to provide net benefit for biodiversity (NBB) i.e. a better outcome than if the site was left undeveloped, shall be implemented in accordance with details that shall first have been submitted to and approved in writing by the Local Planning Authority. The measures shall thereafter be maintained for the lifetime of the development.*'

This Statement (along with an associated plan) seeks to provide the information required to discharge this condition. This Biodiversity Statement considers enhancement measures only.

1.3 This Biodiversity Statement includes the following:

1. A brief description and assessment of the existing habitat within the survey site.
2. Identification of locations and opportunities for potential ecological enhancements within the survey site.
3. Consideration of the potential for off-site provision (elsewhere within the school grounds).
4. Demonstration of how net benefit for biodiversity (and ecosystem resilience) will be secured and maintained. Full details of the recommended ecological enhancements.

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

Site Description

1.4 A site visit was undertaken on 4th March 2025 by Tom Knight of Marches Ecology. The weather during the visit was 40% white cloud cover with bright sunshine and a light breeze. One of the purposes of the visit was to broadly characterise the existing ecological resource and vegetation/ habitat within the survey site. 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.

1.5 The boundary of the survey site is indicated on *Figure 1*. Target Note locations (numbered 1 to 8) described in the text below are indicated on *Figure 1*; no separate target note descriptions are provided.

1.6 The survey site is located to the northeast of St. Giles School on ground that slopes down to St. Giles Way, further to the northeast. This slope is generally characterised by areas of amenity grassland with a number of ornamental trees.

1.7 Madeira Hill leads to the southern corner of the survey site. It is bounded to the immediate southeast by a tarmac-surfaced footway. To the southwest is the main school grounds which, by the survey site, are characterised by buildings and hard-standing. To the north and northeast there is amenity grassland and trees/ shrubs.

1.8 It is an urban location just to the south of the centre of Wrexham. The survey site and school grounds are largely bordered by a range of residential properties to the south, east and west, along with roads including Poplar Road and Madeira Hill. Further to the north/ northeast, and on the opposite side of St. Giles Way, there are retail properties, car parks and a small green open-space by the River Gwenfro.

1.9 Most of the survey site is characterised by regularly managed amenity grassland which had recently been cut to 0.05 m high at the time of the site visit (*Target Note 2*). This grassland is dominated by *Lolium perenne* (Perennial Rye-grass) with locally frequent *Bellis perennis* (Daisy), occasional to frequent *Agrostis capillaris* (Common Bent) and occasional to locally frequent *Ranunculus repens* (Creeping Buttercup).

1.10 Some of the grassland beneath the trees within the survey site had not been recently cut (*Target Note 3*). This area appears to be less frequently cut and the sward was approximately 0.2 m high. It is dominated by Perennial Rye-grass with frequent *Ranunculus bulbosus* (Bulbous Buttercup), locally frequent *Primula veris* (Cowslip), *Hyacinthoides* sp. (Bluebell), occasional *Allium ursinum* (Ramsons), *Ranunculus acris* (Meadow Buttercup), *Urtica dioica* (Common Nettle), *Senecio jacobaea* (Common Ragwort), occasional *Festuca rubra* (Red Fescue), and small amounts of *Geranium pyrenaicum* (Hedgerow Crane's-bill), *Fragaria vesca* (Wild Strawberry) and *Geum urbanum* (Wood Avens).

1.11 There is a small slope adjacent to the southeast site boundary that supports moderately species-rich neutral grassland. It includes species such as locally frequent *Arrhenatherum elatius* (False Oat-grass), *Dactylis glomerata* (Cock's-foot), Red Fescue, *Leucanthemum vulgare* (Oxeye Daisy), *Achillea millefolium* (Yarrow), Bulbous Buttercup, occasional Cowslip, *Centaurea nigra* (Common Knapweed), *Lotus corniculatus* (Common Bird's-foot-trefoil), and lesser amounts of *Luzula campestris* (Field Woodrush), *Carex divulsa* subsp. *divulsa* (Grey Sedge), *Hypericum perforatum* (Perforate St. John's-wort) and *Trifolium pratense* (Red Clover).

1.12 There are a number of planted trees throughout the survey site, particularly the southern half (*Target Note 6*). They largely have diameters at breast height (dbh) of 0.2-0.4 m and include *Betula pendula* (Silver Birch), *Quercus robur* (Pedunculate Oak), *Salix* sp. (Willow), *Prunus* sp. (Cherry), *Acer campestre* (Field-maple), *Fagus sylvatica* (Beech), *Fraxinus excelsior* (Ash), *Crataegus monogyna* (Hawthorn) and *Corylus avellana* (Hazel).

1.13 The southwest and northwest survey site boundaries are formed by fences. The southwest boundary is largely formed by green powder-coated profile mesh to 2.4 m high (*Target Note 5*). *Hedera helix* agg. (Ivy), *Lonicera periclymenum* (Honeysuckle) and *Rubus fruticosus*

agg. (Bramble) are occasional growing through this fence. There is a small patch of Bramble and *Buddleia davidii* (Butterfly-bush) scrub at *Target Note 5a*.

1.14 The northwest boundary is partly formed by metal palisade fence and part by post and barb-wire fence (*Target Note 8*). Much of this fence is obscured by dense Ivy, Bramble and some *Sambucus nigra* (Elder). Two probable Badger breaches were noted beneath this fence (*Target Note 7*).

1.15 There is a low stone wall along part of the southeast boundary (*Target Note 1*). The eastern boundary is open.



The trees and grassland in the northwest corner of the survey site.



Some of the planted trees (*Target Note 6*).



The small slope (*Target Note 4*) that supports moderately species-rich neutral grassland.



The less frequently cut amenity grassland (*Target Note 3*) is on the left and the short amenity grassland (*Target Note 2*) is on the right.



The southern half of the survey site from the east.



The northern half of the survey site from the east.



The northwest boundary (*Target Note 8*).

School Grounds

1.16 The existing school grounds are located outside the red line boundary – the application site – but within the blue line boundary – land owned by the applicant. During the site visit the wider school grounds were viewed to consider potential options for 'off-site' NBB provision. The school grounds offer a range of potential opportunities. However, national planning policy favours 'on-site' provision and in this instance, it is possible to achieve this.

The Proposal

1.17 The proposal concerns a change of use of the land. The existing amenity resource will be incorporated into the school grounds and be developed as a forest school. A new security fence will be erected around the survey site. The fence will be of green powder-coated profile mesh to 2.4 m high. It will include a pedestrian gate and separate vehicular access gate.

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)[5]. Subsequently, Chapter 6 of PPW has been updated 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 and shrubs 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*'[6]. It is proposed to plant a small number of (Welsh variety) fruit trees, plant some native woodland flowers, and climbing plants, and implement a more sympathetic grassland management regime.

[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] Pitt, J. (2021). *Development: Nature's new friend?* Final Report July 2021. Produced on behalf of North Wales Wildlife Trust.

[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] Welsh Government (2024). *Planning Policy Wales. Edition 12: February 2024*.

[6] 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.

2.4 The following enhancement measures are proposed:

- Four fruit trees (Welsh variety) will be planted in the more open area towards the north of the site. The fruit produced by these trees will provide a potential food source for birds and invertebrates, as well as the children. The blossom will also provide a valuable nectar source early in the year. This will contribute to achieving the aspirations of *The Action Plan for Pollinators in Wales*[7].
- Six climbing plants that provide a potential nectar source will be planted along the new security fence.
- A suite of woodland flowers will be planted beneath the existing trees.
- A grassland management regime that is more sympathetic to wildlife will be implemented across the site.

2.5 The proposed enhancements have been selected so that they can be implemented by the school children (with the exception of the grassland management), possibly as part of the forest school lessons.

Assessment of Required Level of Provision

2.6 The change of use to a forest school along with installation of a boundary fence can be categorised as a small/ low impact proposal. All of the existing trees are to be retained. There may be some small loss of amenity grassland associated with the installation of the fence and ongoing evolution of the forest school resource. The existing amenity grassland is of low ecological value. Although it is connected to a larger similar resource, this grassland is also of low ecological value.

2.7 The loss of this grassland 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 increase the general biodiversity value of the site and provide an important resource for pollinators.

Biodiversity Enhancement Recommendations

Planting Welsh Variety Fruit Trees

2.8 It is proposed to plant four Apple trees. These trees would be of Welsh varieties (such as the Bardsey Island Apple) to be selected from Ian Sturrock & Sons[8] or 'Tom the Appleman'[9]. The apple varieties selected should all be in the same pollination group.

2.9 These trees should ideally be selected with a Dwarf rootstock (M9) which provides a good bush structure up to 2.5 m high. The Dwarf rootstock should allow young children to at least be involved with harvesting the apples.

2.10 Planting should be undertaken in accordance with the supplier's instructions[10]. They should be planted at least 2 m apart. They will require permanent stakes and control of grass

[7] Welsh Government (2013). *The Action Plan for Pollinators in Wales*. Welsh Government, Aberystwyth.

[8] https://iansturrockandsons.co.uk/eating-apples/

[9] https://tomtheappleman.co.uk/product-category/apples/

[10] https://tomtheappleman.co.uk/planting/

around the base. Annual mulching would be an effective way of controlling grass growth. They should also be fitted with strimmer guards[11][12].

2.11 The trees should be checked annually by the school. Any losses will be replaced. Some maintenance including possibly watering, may need to be undertaken during establishment.

Planting Flowering Climbing Plants

2.12 Six native Honeysuckle (*Lonicera periclymenum*) plants should be planted against the new security fence along the northeast site boundary. The plants can be sourced from Naturescape[13] or Habitat Aid[14]. Planting should be undertaken in accordance with the supplier's instructions. They should also be fitted with strimmer guards. These can be planted and maintained by the school children.

Plant Woodland Wildflowers

2.13 It is proposed to plant the following wildflowers beneath the existing trees:

- Primrose (*Primula vulgaris*) – 25 no.
- Common Dog's-violet (*Viola riviniana*) – 25 no.
- Red Campion (*Silene dioica*) – 25 no.
- Wild Daffodil (*Narcissus pseudonarcissus*) – 25 no.

2.14 These wildflowers can be planted by the school children but should target areas that will not be the subject of heavy footfall as far as is possible. Planting should be undertaken in accordance with the supplier's instructions. The plants can be sourced from a number of UK companies including Landlife Wildflowers[15], Meadowmania[16] or Naturescape[17].

2.15 The first three species of plant listed above should be planted using plug-plants. Daffodils would be supplied as bulbs. Landlife Wildflowers provide the Wild Daffodil bulbs 'in the green'.

2.16 Some maintenance including possibly watering, may need to be undertaken during establishment.

2.17 The planted areas may need to be defined with some kind of marker posts to minimise the possibility of inadvertent mowing.

Grassland Management

2.18 The grassland across most of the site should be cut once a year in August or September. Where areas of shorter grassland are required such as in seating areas these should still be cut regularly as required. A network of informal paths can be cut through the areas of longer

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

[12] https://www.ewburrownursery.co.uk/catalogsearch/result/?q=strimmer+guards

[13] https://www.naturescape.co.uk/product/wild-honeysuckle/

[14] https://www.habitataid.co.uk/products/honeysuckle-lonicera-peryclymenum?srsltid=AfmBOorq4OLYVca5pcY9Kz0rAF0ZCsEq5wH229KULuoyTjJzLcN5o6nC

[15] https://www.wildflower.co.uk/products/wildflower-plugs-and-plants/perennial-wildflower-plug-plants/

[16] https://meadowmania.co.uk/collections/wild-flower-meadow-wild-flower-plug-plants

[17] https://www.naturescape.co.uk/product-category/wildflowers/?_sft_pa_product-type=plugs

grassland. Cut grass material should be removed from site or collected into a grass pile in a corner.

2.19 There are a number of existing wildflowers in the grassland such as Cowslips, Wild Strawberry and Ramsons, and this should give them an opportunity to flower before being cut.

Maintenance and Monitoring

2.20 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.

2.21 It is proposed that the NBB provisions including the management of the habitat within the Forest School is monitored by the Eco-School Council. The Council can compile a short report/ presentation for staff/ pupils which could be shared with the WCBC ecologist on request.



Individual broad-leaved tree
Locations are approximate only.

Scattered scrub

Target Note

Survey site

C568 Change of Use of Land for Use as a Forest School and Erection of Fencing, St. Giles Primary School, Madeira Hill, Wrexham, LL13 7HD - Biodiversity Statement

***Figure 1* - Target Notes**

Date: 05/03/2025

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Base mapping provided by the client.