

Green Infrastructure Statement
Former Air Products Site, Llangollen Road, Acrefair LL14 3HW
Erection of 5no dwellings- planning reference P/2024/0157

Introduction

This statement aims to set out the client's approach to the consideration of green infrastructure (GI) in relation to their existing development and should be read in conjunction with the application documents, in addition to meeting the objectives raised in the revised Chapter 6 of Planning Policy Wales for:

- Green Infrastructure
- Net Benefit for Biodiversity and the Step Wise Approach
- Protection for Sites of Special Scientific Interest
- Trees and Woodlands



The site was given permission in December 2023, reference P/2021/0793 for the:
Erection of 21 three- and four-bedroom dwellings with associated works

This application relates to an additional plot within the development, raising the number of units to 22.



Image left- area under consideration within the overall development site, edged in blue.

To achieve this some minor amendments are proposed to the approved layout and substitution of housetypes. We do not propose any changes to the road pattern as approved therefore the hard landscaping remains as existing.

The site comprises of vast hardstanding having formed part (where site offices and car parking areas were located) of the former Air Products Engineering site, which closed in 2009. The site housed a factory producing industrial gases for the Air Products Company, and was then allocated as a potential mixed use or housing development site by the Local Planning Authority due to its location in Acrefair. To the south there is a large area of vacant land that once formed part of the main Air

Products Engineering facility. It is understood that that the site was cleared of all structures in 2015 with the crushed demolition rubble left spread across the site. Ground slabs and foundations were broken up and removed. The site has very little or no green enhancements.

The site is shown on early Ordnance Survey maps as part of the site of the New British Iron Works and was occupied by buildings serviced by rail or tram tracks which linked the iron works to mines owned by the company and to the main railway network. A bank of blast furnaces survives at the southern edge of the site, built against a steep bank which is part of the site but outside the area proposed for housing development.

The main area of hardstanding carpark is of limited biodiversity interest whilst the woodland habitats around the site's eastern boundary are considered likely to be of a biodiversity value. The development proposals retain this woodland with the proposed new housing restricted to the area of existing hardstanding carpark. The woodland area will be fenced off so as to restrict access to the residents and public. Access to the woodland will be for the Management company and their agents for repairs.

The site is therefore superbly situated for new homes and being a brownfield site, this is an excellent use of using redeveloped land in lieu of greenbelt land.

The site is not within a conservation area, nor in an Area of Outstanding Natural Beauty. There are no listed buildings within the vicinity of the site and consequently there are no special designations to be accounted for. The original application was supported by a desk based Archaeological Assessment Survey, which stands for this minor application.

The site is considered to have high potential for holding some structural evidence of the iron works although clearance of the iron works infrastructure and machinery will have reduced this potential. Any such remains are likely to be of moderate to low significance because of site clearance and remodelling by grading and levelling of the site area for later development.

Guidance stipulates that this GI statement should be proportionate to the scale of the development proposal. The proposal is to vary the overall numbers of the re-development and makes no changes to the principle of development. This statement is therefore considered to have been prepared in a proportionate manner to the modest scale of the proposed development.

Proposed works

The proposal seeks to change very little in terms of built form square-meterage however the modifications provide an additional, much needed, home in the area.

The site was surveyed in 2021 by Kingdom Ecology and their report formed part of the original application. Further discussions have been made with Emma Broad of the Local Authority with regard to implementing the arches on site as suitable roosting habitats for all types of bats, including horseshoe bats.

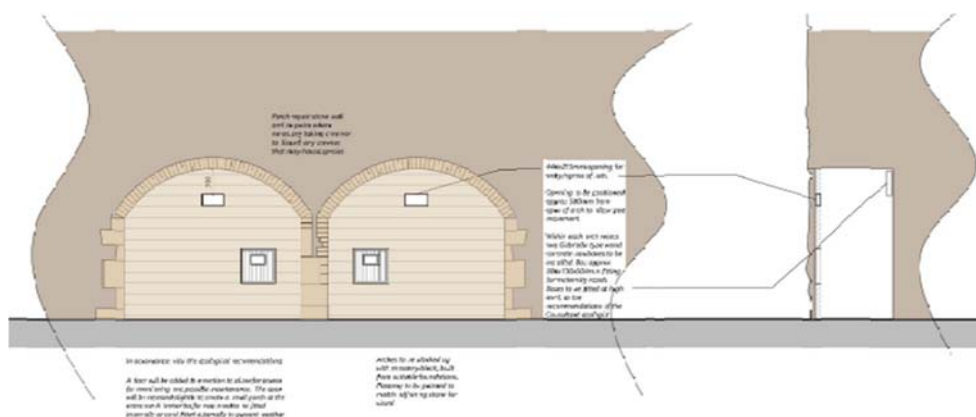


image left- sketch for works to arches on site enhance ecological values

The arches will be blocked up with masonry, with a door opening at the front to allow for access for monitoring and maintenance and an opening approximately 440mm by 215mm for entry/egress of bats, the converted coke ovens within the arches would cater for all bat species.



Recommendations also included the installation of two Gabriella Bat Boxes within the arch interior, as high as possible. These boxes are an ideal nesting space for a range of bat species such as common pipistrelle, soprano pipistrelle and brown long-eared bat. It provides a large single internal compartment making it excellent for bat maternity roosts.

The woodland habitat will be retained with the proposed development designed to avoid impact to the trees present and any lighting designed to limit the risk of any increased illumination of the adjacent woodland habitats. This will be with a view to retaining a dark corridor for any foraging/commuting bats.

A suitably qualified ecologist will inspect the ecological features on handover of the woodland area, and every 3 years thereafter to check the bat and bird boxes, habitat piles that will still be in place, and to inspect the interior of the coking oven arches for bats. This monitoring will identify any measures required for repairs or reinstatement.

Green infrastructure

The Environment (Wales) Act 2016, provides a context for the delivery of multi-functional green infrastructure. Its protection and provision can make a significant contribution to the sustainable management of natural resources, and in particular to protecting, maintaining and enhancing biodiversity and the resilience of ecosystems in terms of the diversity within and connections between ecosystems and the extent and condition of these ecosystems, so that they are better able to resist, recover from and adapt to pressures. This means that the development of green infrastructure is an important way for local authorities to deliver their Section 6 duty.

Providing green infrastructures offers numerous benefits to the locality, both socially and economically as well as environmental enhancements. The advantages in considering green infrastructure during the development process can benefit flood management, water purification, improved visual aesthetics, reduce noise / air pollution and contribute

positively to local climate and wellbeing. Introducing these key changes within urban environments can boost civic pride and improve social interaction and the tranquillity of the spaces.

Green Infrastructures can work towards improving local townscapes in urban environments and generate community opportunities.

It is recognised that all development proposals need to explore a step wise approach when considering green infrastructure, to ensure each development has an environmental net gain.

Here at the Heritage Court development, we have undertaken the step approach as follows:

1.

a) *The first priority for planning authorities is to avoid damage to biodiversity in its widest sense (i.e., the variety of species and habitats and their abundance) and ecosystem functioning.*



Where there may be harmful environmental effects, planning authorities will need to be satisfied that any reasonable alternative sites (including alternative siting and design options) that would result in less harm, no harm or benefit have been fully considered.

In summary the site comprises of an area of hardstanding carpark which is largely sealed and intact but with some patches of young trees/scattered scrub including goat willow, silver birch and buddleia.

The south eastern boundary of the site supports a band of broadleaved woodland located on a steep embankment. The woodland principally comprises of mature ash and sycamore. There are further scattered broadleaved trees on the north eastern boundary of the site. The development proposals would retain this woodland with the proposed new housing restricted to the area of existing hardstanding carpark.

With regard to any invasive species on site for clearance, the contractor will commit to removing these by following the Natural England, Department for Environment, Food & Rural Affairs and Environment Agency recommendations of:

- *spraying with chemicals, for large infestations only- although treating large shrub infestations with herbicides poses less danger to the environment than letting them grow, herbicides must be chosen mindfully - **targeted varieties and those that break down fast**, causing minimal chemical damage to the environment is the most effective method, without due care pesticides can destroy your other plants, contaminate the soil and water, etc.*
- *pulling or digging out live, dead or dying plants*
- *cutting back plants to prevent the seeds dispersing- the painting stumps method (cutting the shrub as close to the ground as possible and “painting” it with a herbicide soon after), then spraying regrowth, is most effective. When done later in the year, **it has a success rate of 90%**.*
- *burying them on the land rather than removing offsite as this itself uses valuable landfill capacity and increases the likelihood of the spread of **invasive** plants. Without sunlight, plants cannot survive and seeds will not germinate therefore burying on site can be effective.*
- *burning them*
- *disposing of them off site in a controlled manner*

On this basis, we feel the proposal does not cause any harmful environmental effect.

b) Proposals in statutory designated sites are, as a matter of principle unacceptable, and therefore, must be excluded from site searches undertaken by developers. This principle also extends to those sites containing protected species and habitats which are irreplaceable and must be safeguarded. Such sites form the heart of resilient ecological networks and their role and the ecosystem services they provide must be protected, maintained and enhanced and safeguarded from development. It will be wholly exceptional for development to be justifiable in such instances.

A full Biodiversity Risk Assessment has been undertaken for the site, and approved by the Local Authority. This application makes no changes to this and all avoidance measures will be fully implemented.

2.

When all locational, siting and design options for avoiding damage to biodiversity have been exhausted, applicants, in discussion with planning authorities must seek to minimise the initial impact on biodiversity and ecosystems by:

- maintaining the largest possible area of existing habitat supporting biodiversity and functioning ecosystems, particularly Section 7 habitats and species where present, by minimising development size and appropriate orientation on site, paying due regard to the potential for continued long term maintenance and management of retained areas to benefit biodiversity.

The site is restricted to the main area of hardstanding carpark and the development proposals retain the woodland giving restricted access to the residents and public. Access to the woodland will be for the Management company and their agents for repairs.

- ensuring that retained habitats continue to be well connected to adjacent habitats to provide connectivity for key species and ensuring that the favourable conservation status of local species populations is maintained.

Extensive reports have been undertaken, submitted to, and approved in writing for the development as a whole. WE do not seek any deviations from these.

Summary

A separate application has been made, and approved, to discharge conditions relating to ecological enhancements. This includes a Biodiversity Risk Assessment, Ecological Method statement and management plan, together with a walk over survey for badger activity. On this basis we can conclude that the site's green credentials have been fully considered.