

Green Infrastructure Statement

Land at Holt Road

Introduction

- 1.1 In October 2023, updates to Chapter 6 of Planning Policy Wales 11, 'Addressing the Nature emergency through the Planning System: Updated National Planning Policy for Chapter 6 of Planning Policy Wales' took immediate effect.
- 1.2 In summary, the main policy changes related to:
- 1.3 Green Infrastructure: stronger emphasis on taking a proactive approach to green infrastructure covering cross boundary considerations, identifying key outputs of green infrastructure assessments, the submission of proportionate green infrastructure statements with planning applications and signposting Building with Nature standards.
- 1.4 Annex, Para 6.2.5 states that these should "be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multifunctional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (Paragraph 6.4.21) has been applied."
- 1.5 The Building with Nature standards represent good practice and are an effective prompt for developers to improve the quality of their schemes and demonstrate the sustainable management of natural resources. Using these standards in a way which is proportionate to the nature and scale of the development proposed is a useful way of ensuring appropriate consideration in circumstances where there is an absence of a green infrastructure assessment and planned approach or relevant local or Supplementary Planning Guidance.
- 1.6 More recently, Wrexham County Borough Council (WCBC) adopted the Local Development Plan 2013 – 2028 (adopted 20th December 2023). Relevant policies contained within relating to green infrastructure include:
- 1.7 Policy SP14: Natural Environment – of which "Development will only be permitted where it seeks to protect, conserve and enhance the natural environment including - Natural landscape features and Green Infrastructure such as trees, hedges and woodland which contribute to the quality and diversity of the natural environment and play an important role in mitigating the impact of climate change"

1.8 Policy SP19: Green Infrastructure - of which "Development will be required to maintain the extent, quality and connectivity of multifunctional green infrastructure on or near a site, and, where appropriate to enhance it by:

- Creating new interconnected areas of green infrastructure between the proposed site and the existing network;
- Filling gaps in the existing network to improve connectivity;
- Protecting the features most valuable for both nature and people; and
- In instances where loss of green infrastructure is unavoidable, provide mitigation and compensation for the lost assets on a site-specific basis.

1.9 Building with Nature Standards Framework 2.0 involves twelve standards arranged across four groups. There are six Core Standards and three themes, Wellbeing, Water and Wildlife.

Core

- Optimises Multifunctionality and Connectivity;
- Positively Responds to the Climate Emergency
- Maximised Environmental Net Gains;
- Champions a Context Driven Approach;
- Creates Distinctive Places; and
- Secures Effective Place-keeping.

Wellbeing

- Brings Nature Closer to People; and
- Supports Equitable and Inclusive Places.

Water

- Delivers Climate Resilient Water Management; and
- Brings Water Closer to People.

Wildlife

- Delivers Wildlife Enhancement; and
- Underpins Nature's Recovery.

1.10 This Green Infrastructure Statement has been structured around the four groups above and provides a narrative, signposting how the Building with Nature Standards are evident within the proposed development and how it utilises high-quality green infrastructure to deliver a better place for people and wildlife, and thus compliance with nationally and locally adopted policy.

Core

- 2.1 Land at Holt Road offers a context driven green infrastructure approach by the developers and project team from the early stages of design.

Multifunctional

- 2.2 The scheme is underlain with a landscape framework which combines individual features that contribute to a network of multiple benefits. This is delivered by the retention of the existing ecology-landscape structure of hedgerows, broadleaved tree plantation and pond identified at the outset which have provided the basis of a green corridor framework throughout the Site (DAS page 19). As well as the retention of these features, additional planting will be provided to enhance them. Drainage features are strategically located at the lowest points of the Site, integrated within green corridors and open spaces with the ability to be planted in a way which optimises their biodiversity. The vast majority of these green corridors and attenuation features will be accessible via pedestrian routes that will be available to a range of users, being at grade and appropriately surfaced offering recreational opportunities that will be accessible throughout the year.

Connected

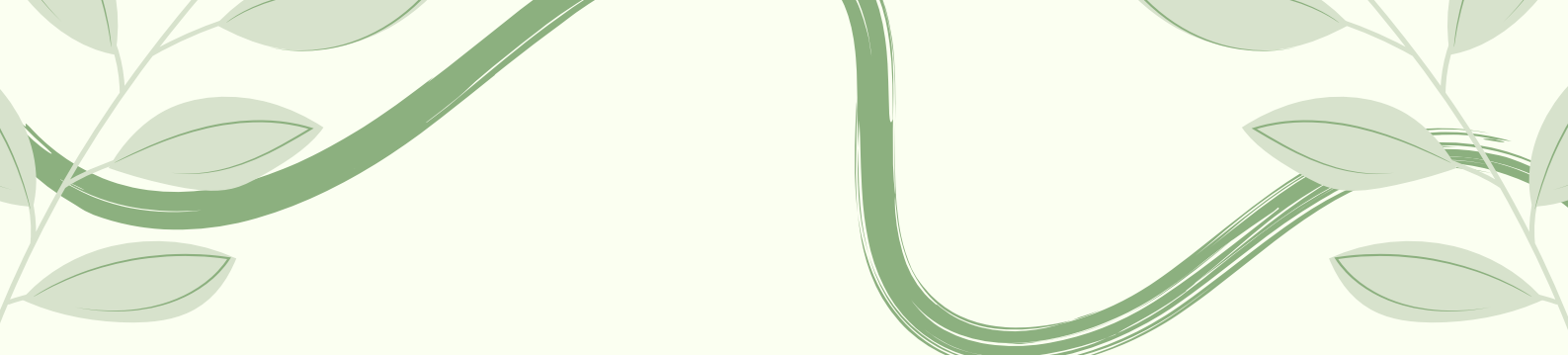
- 2.3 The integral network of green infrastructure retains existing links across the Site as well as the existing connections to adjacent areas. The proposals retain the existing pond which provides a 'stepping stone' feature (as identified within the EclA page 11) between offsite habitats whilst retained broadleaved plantation, scrub and hedgerow network continue to connect to the wider green infrastructure network. The Site layout in terms of its green infrastructure features and built form has been orientated to maximise the potential for effective linkages between habitats and onward enhancement of adjacent wildlife assets and networks.
- 2.4 The proposed scheme is designed to be accessible and encourage active travel through the provision of a comprehensive network of road and pedestrian paths to ensure all parts of the development are readily accessible to all users through the consideration of levels, gradients and surfaces (DAS page 34). The accessibility of these routes is applied across the whole site, with a 3m wide shared use footpath / cycleway diagonally through the Site, as well as pedestrian routes and access points to adjacent routes which are of a level, surfaced nature (Tyn-twill Farm, Thornhurst Drive, Bryn Estyn Road, and A534).



Sympathetically placed

- 2.5 In terms of placement, the scheme is well related to existing urban form and is determined to result in limited landscape and visual effects as identified within the LVIA. The scheme proposals have responded to the landscape character it is sited within, through retention and enhancement of its fabric, with additional planting provision to assimilate it into its context (LVIA page 34).



- 
- 2.6 A series of views and nodes have been designed into the scheme to provide an appreciation of the internal green spaces and retained and enhanced landscape features. In addition, there will be visual links from within housing areas along these corridors to the wider landscape and adjacent areas, providing a sense of orientation and placement. The scheme will also be set out such that all areas of public open space and pedestrian routes will be overlooked by building frontages.
- 2.7 Key frontages, key focal buildings, secondary focal buildings and gateway features are all designed into the scheme to assist in creating a sense of place including the framing and termination of views through attractive built form as illustrated within the Parameter Plans and page 29 of the DAS. In addition, the scheme includes four 'character areas' designed to integrate the development into the surrounding area, enhance legibility and sense of place (further details are provided within DAS pages 37-41).
- 2.8 Overall, the strong, block structure of the scheme, coupled with a strong, integral, multifunctional network of GI connects the scheme to the wider area and assists in providing an attractive development with a strong sense of place.

Resilient

- 2.9 Whilst the detailed planting is not provided at this stage, the scheme has the ability to provide a range of native species and species adaptable to the threat of climate change and assist with drainage and filtration. The detail of this would be provided by detailed plans and agreement with the SuDS Approval Body (SAB) and could be secured by a suitably worded condition.
- 2.10 As described within the Flood Consequences Assessment (FCA), the modelling and scheme design is able to accommodate a 1 in 100 year flood event plus 30% additional allowance for climate change. The FCA concluded that development can be delivered so as not to be at risk of flooding from external sources or from within the development, and so as not to increase flood risk to the surrounding area.

Responsibly Managed

- 2.11 At this outline stage there is no Landscape and Ecological Management Plan (LEMP) in place, however, as is usual, the details of this to secure the function and benefits of the integral green infrastructure could be agreed through a suitably worded condition.

Environmentally Sensitive

- 2.12 A step-wise approach has been undertaken with regards to ecology by avoiding impacts to ecological habitats of local value in the first instance (i.e. hedgerows, broadleaved plantation and pond), whilst any incidental losses are compensated through replacement planting in the form of native tree species, hedgerows and creation of SuDS planting. The proposed planting is also able to deliver a Net Biodiversity Benefit (NBB) (EcIA para 3.7). The scheme has sought to mitigate any of its own local impact and overall improves the quality of the immediate natural environment, particularly through enhancements to biodiversity and drainage provision.

Wellbeing



- 3.1 There are a range of green features and spaces provided for within the proposals suitable for the scale, type and locality of the development. The proposals go over and above to deliver open space, exceeding the former Wrexham Unitary Development Plan Policy CLF5, Fields in Trust 'Six Acre Standard' and the recently adopted Local Development Plan Policy CF2 requirements, of which the highest open space provision figure was of 4.8ha (Policy CLF5) for the size of the development. In total, the proposals allow for 7.7ha of open space provision (DAS page 9).
- 3.2 The proposals do not provide on-site playing fields, however it is acknowledged in the DAS that the Site is located in close proximity to formal playing fields (Wrexham Rugby Club and Ysgol Morgan Llwyd) and contributions will be made to WCBC for the improvement of off-site playing fields / sports facilities if required.
- 3.3 The green spaces on Site are connected via a network of routes which are at a level gradient and would be of a suitable surface for a multitude of user groups (DAS page 34) a controlled by a detailed design condition. These areas of green space would be accessible at all times of year. Along these routes and within areas of open space will be a mix of native planting is proposed throughout the scheme, enabling the ability to provide seasonal interest and promote year-round use.
- 3.4 Positive placemaking design as identified in the previous section provides variety and an attractive interface for residents (new and existing) to experience the multifunctional and integral green infrastructure. A series of views and nodes create visual links from within the housing areas to the wider landscape. Nodes in particular offer the potential for recreation and relaxation as identified within the DAS (page 28).
- 3.5 SuDS basins within the scheme are designed to be dry basins for most of the year, taking on water during periods of excessive rainfall, however this will provide seasonal interest and variation during warmer and wetter months adding to the amenity value of the scheme.
- 3.6 The proposed scheme is designed to be highly accessible, providing a comprehensive network of road and pedestrian paths to ensure all parts of the development are readily accessible to all users through the consideration of levels and appropriate gradients (DAS page 34), including the provision of appropriate path surfaces to take into account the needs of all user, whilst all entry points to buildings with public access will be on level ground for ease of access. The treatment of these routes and accessibility is applied across the whole Site. A shared footpath / cycleway will run through the 'Central Greenways' character area, travelling diagonally through the Site from A534 and Bryn Esty Road whilst other access points will be available between Tyn-twl Farm, and Thornhurst Drive at the western edge of the scheme and its interface with the existing extent of Wrexham



Water

- 4.1 The proposed development is able to positively manage flood risk from the existing watercourses, pond and surface water run-off from the development by incorporating a sustainable drainage system which will include attenuation ponds, basins and swales.
- 4.2 The green infrastructure and water management system is designed to be on at the surface and splits up volumes of water to be managed as landscape features through appropriate, wet grassland planting. The proposals consider the wider catchment and the Site itself is within Flood Risk Zone A, deemed to be at the least risk of flooding (Flood Consequences Assessment para 1.2).
- 4.3 The DAS at page 24 illustrates the surface water drainage strategy which includes indicative locations of basins which may be mitigated by the provision of soakaways and/or infiltration trenches throughout the development subject to more detailed assessment. The drainage strategy is designed to work with the existing landform (DAS pages 14 and 19), feeding towards the lower part of the Site. Existing water bodies are retained within the scheme.
- 4.4 These drainage features to be located within the open space network throughout the scheme are accessible by a network of pedestrian routes and are to be designed to enhance the ecological and amenity value of these spaces through planting of wetland grassland mix (DAS page 36) with illustrative tree planting demonstrated on the Illustrative Masterplan (DAS page 31).
- 4.5 SuDS features are also designed not just to manage water on Site, but also to provide amenity value within the green infrastructure. One such example is the 'Key corner/SuDS', identified on page 28 of the DAS as an 'opportunity for recreation and relaxation', 'a revelation or framing of a particular view of vista'.



Wildlife



- 5.1 The illustrative Concept Layout and Design and Access Statement illustrates how new development will create positive Green Infrastructure linkages and contribute to the local landscape. The GI Strategy for the Site is centred around the existing strong habitat framework.
- 5.2 The proposed development concentrates built form on the least valuable, arable areas of the Site and retains the hedges, trees, scrub and ponds which has led to a natural creation of green corridors throughout the scheme. New planting along these areas and within open spaces assists in creating effective links between new and existing on-site habitats within existing ecological habitats and networks beyond the boundary of the Site.
- 5.3 As confirmed within the EclA (para 3.7), the project is able to deliver a Net Benefit to Biodiversity (NBB) as consistent with PPW11 Chapter 6 Update (October 2023). The scheme has also employed a step-wise approach (mitigation hierarchy) to habitat and species protection. Section 3 of the EclA highlights this, confirming that the proposed development would mainly affect arable habitat of negligible ecological importance (and not a strategic target for expansion within the step-wise approach and general nature recovery), requiring no specific mitigation and would have limited impact on fauna which use it.
- 5.4 Those habitats of local ecological importance and/or priorities for conservation (under section 7 of the Environment (Wales) Act 2016) located on Site include: areas of woodland; trees; hedgerows and pond. The proposals have applied the step-wise approach through retention of these features, whilst also enabling their enhancement through provision of plug planting within hedgerows (EclA para 3.5) and continued connection to habitats within the wider landscape. The existing pond provides a 'stepping stone' feature between offsite habitats, whilst new areas of woodland are proposed to supplement existing woodland and provide additional connectivity to the wider landscape, as well as widespread treeplanting, meadow grassland and planted SuDS features along all corridors (EclA para 3.5).
- 5.5 Species-specific enhancements include native planting, SuDS designed using ecological design principles, and provision of bat and bird boxes would enhance the Site for wildlife and increase the habitat diversity on Site providing a range of nesting, foraging and commuting opportunities for species such as invertebrates, bats and birds. A sensitive lighting scheme alongside the retention of all boundary features such as hedgerows and woodland edges as dark corridors ensures that the foraging and commuting resources for bats remain unaffected. A development buffer of at least 30m is also proposed around each of the badger sett entrances on the eastern boundary, and so no direct impacts on these setts are expected (S.5-S.6 EclA).
- 5.6 As such it is considered that Site layout, in terms of its green infrastructure features and built form, has been orientated to maximise the potential for effective linkages between habitats and onward enhancement of adjacent wildlife assets and networks.

Summary

- 6.1 Land at Holt Road, Wrexham presents a high-quality, well designed scheme of which the vision extends far beyond assisting with housing demand and provision of minimum open space requirements to meet policy requirements.
- 6.2 It delivers a scheme which balances high-quality and sensitive architectural design with green infrastructure that supports improved connection between people and the natural environment, ensuring a positive impact on the community's well-being and providing a sustainable and inspiring environment for future generations.
- 6.3 It has been designed to seamlessly integrate with the surrounding area and includes quiet tertiary streets and shared spaces with active travel links available throughout. The design brings users closer to nature and water via the green corridors whilst also providing a multitude of sitewide and onward connections that are accessible.
- 6.4 A step-wise approach has been undertaken from the very outset, retaining those ecological-landscape features of local value to provide the framework for the design evolution of the scheme. The retained and enhanced framework also maintains and improves upon existing connections with the green infrastructure network beyond the bounds of the Site itself. The proposals go above and beyond in terms of policy requirements to deliver high-quality public open space which is able to assist in contributing to a Net Benefit to Biodiversity.
- 6.5 The green infrastructure proposals demonstrate a clear commitment to positively respond to the climate and ecological emergencies, with integral SuDS features, the accommodation of native and climate resilient planting and biodiversity gains.
- 6.6 In addition, the approach to the design of the public realm demonstrates a strong commitment to delivering outcomes for the health and wellbeing of residents, visitors, and the wider community.
- 6.7 Overall it is considered through the narrative provided within this document and the evidence provided as part of the planning application, that the scheme and its design meets the recent policy updates to both PPW 11 Chapter 6 and the adopted green infrastructure related policies of the WCBC Local Development Plan 2013 – 2028.

