



DATE: 14th November 2024

SITE: Dragon Packaging, Wrexham Industrial Estate

REFERENCE: UES03538/06

GREEN INFRASTRUCTURE STATEMENT

As a result of updated National Planning Policy for Chapter 6 of Planning Policy Wales, a Green Infrastructure Statement is now required to be submitted with all planning applications.

United Environmental Services Ltd (UES) was commissioned by FI Facilities Management Ltd to produce a Green Infrastructure Statement for the proposed development site at Dragon Packaging, 47 – 48 Clywedog Road North, Wrexham Industrial Estate, Wrexham. This document has been prepared with support of planning consultant, Plan Red Ltd, drawing on the evidence prepared by MD Landscape and Shaw-Stephens in support of the planning application P/2022/1052 and inter-related matters of landscaping, arboriculture and water resources.

INTRODUCTION

The applicant is seeking to obtain planning permission for an extension to an existing warehouse, alterations to service yard and new access. The proposals include sufficient levels of mitigation and compensation with regards to protected species and habitats, in addition to ecological enhancement measures, including the long-term retention, management and monitoring of an offsite parcel of woodland.

The proposed development site comprises an existing warehouse building, hardstanding, amenity grassland, a small area of semi-improved neutral grassland, dense scrub, introduced shrub, scattered trees, ephemeral / short perennial vegetation and a dry ditch.

A Preliminary Ecological Appraisal of the site was undertaken by UES in November 2021 (see report reference UES03538/01) and an updated PEA was undertaken by UES in February 2023 (see report reference UES03538/03). These assessments identified potential impacts on protected or otherwise notable species and habitats, including amphibians, badgers, bats, breeding birds, hedgehogs, reptiles, invasive species and trees. Recommendations for mitigation and compensation measures required to protect these ecological receptors are detailed within the PEA reports.

STEP-WISE APPROACH

6.2.5 of the 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 states that 'a green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal...

The green infrastructure statement will be an effective way of demonstrating positive multi-functional 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.'

The step-wise approach, as outlined below, demonstrates the sequential approach that has been adopted as part of the proposed development to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimised, mitigated, and as a last resort compensated for. In addition, enhancement has been secured by delivering a biodiversity benefit on site and immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.

1. Avoid
2. Minimise
3. Mitigate / restore
4. Compensate onsite
5. Compensate offsite
6. Refuse planning permission

ECOLOGY

The site does not contain any habitats of principal importance and is generally considered to be of low ecological value, with moderate quality habitats limited to scattered or small groups of trees and areas of dense scrub at the site boundaries.

The proposed development layout has been informed by the ecological surveys undertaken by UES. Where possible the development has been designed to avoid and minimise impacts on habitats, particularly the trees and areas of scrub, which are considered to be the features of highest value. The majority of these habitats will be retained as part of the proposals, which will predominantly impact areas of hardstanding and intensively managed amenity grassland.

As it has not been possible to avoid impacts to all habitats, compensatory habitat creation and enhancement measures have been proposed and the landscaping scheme has been designed following engagement with UES. Green corridors at the site boundaries have been prioritised for retention and enhancement as part of the design. Enhancement of the ecological corridors to increase connectivity for faunal species has been proposed, particularly along the south-western site boundary where a new native species-rich hedgerow and associated hedgerow base wildflower seeding will significantly increase connectivity.

Wildflower grassland planting will also be provided across the site to compensate for the loss of areas of amenity grassland. Additionally, the majority of retained areas of amenity grassland will be enhanced into areas of species-rich wildflower grassland by relaxing the current management regime and overseeding with yellow rattle.

Additional native species tree and scrub planting is proposed to compensate for the small areas lost and the species composition has been chosen to maximise botanical diversity and ecological value to faunal species.

The proposed habitat creation and enhancement measures, in addition to a long-term management and monitoring plan has been provided in the Landscape and Ecology Management Plan that has been prepared for the site (see report reference UES03538/02).

In addition to the onsite habitat creation and enhancement measures, part of a block of woodland located within the Wrexham Industrial Estate and under the developer's ownership will be subject to a 30-year management and monitoring plan. The entire woodland block is to

be used as an ecological enhancement area for both this and another proposed development within the Wrexham Industrial Estate. A separate Habitat Management and Monitoring Plan document specifically relating to this offsite woodland area has been prepared (see report reference UES03012/21). The inclusion of this offsite woodland as an ecological enhancement area presents an opportunity to secure the long-term management, monitoring and maintenance of this woodland and its value for wildlife within the local area.

With regards to protected species, potential impacts are limited and the PEA report details mitigation measures that are to be implemented to avoid and minimise the impacts to the lowest practicable levels. In addition, an Amphibian Conservation Plan (ACP) document has been prepared to specifically address any impacts on great crested newts (GCNs) *Triturus cristatus* and other amphibians as a result of the development.

There will be no significant loss of habitat to the detriment of any specific faunal species, and compensation for general habitat loss will be provided on site through the aforementioned habitat creation and enhancement proposals. Additional species-specific habitat enhancements are also proposed to benefit protected species known to be present on site or within the local area, including the provision of bat and bird boxes, log piles and amphibian hibernacula.

Through the implementation of the avoidance, compensation, mitigation and enhancement measures detailed above and in the accompanying ecological documents, it is considered that the proposed development will result in a net benefit for biodiversity.

ARBORICULTURE

6.2.1 of the 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 advises that trees are a component of green infrastructure, often universally present with different functions in the landscape, local and smaller scales.

The development proposals have been designed to avoid impacts by retaining trees where possible, however a relatively small proportion will be removed to facilitate the proposals. The arboricultural consultant MD Landscape was engaged at an early stage to provide advice and undertake an Arboricultural Impact Assessment (see drawing number 224/R/200, 15/08/2022). An Arboricultural Method Statement to cover Tree Protection Plan (see drawing number 224/T/300, revised P02, dated 2/5/2023) has been prepared by MD Landscape to detail the mitigation measures that will be implemented to reduce the impact of the development on retained trees. This includes the implementation of root protection areas and the use of tree protection fencing. The combination of the retained trees, mitigation measures and proposed landscape is set out in the Landscape and Biodiversity Proposals Plan (see drawing number 224/L/100, Rev P01.1, dated 2/5/2023).

WATER RESOURCES

A Flood Consequence Assessment has been prepared by Shaw Stephens in support of the application, carried out in accordance with guidance contained in Technical Advice Note 15 Development and Flood Risk (TAN15) and associated Development Advice Maps. The FCA is prepared to demonstrate a risk-based approach by applying a source-pathway-receptor model to planning and flood risk as an iterative design approach. The Assessment demonstrates that the site is not at risk from flooding from a major source (fluvial and/or tidal) with only a low significant risk of secondary source of flooding from surface water. Though the risk is low with only short-term and non-significant flooding in very extreme cases, risk management has been included to maintain existing finished floor levels, use flood resilient and resistant measures in construction and design.

In 2023 it was confirmed that the Five Fords WwTW has capacity to accommodate the proposals in its revised environmental permit for phosphates. This has led to iterative revision of the proposals to remove the need for rain garden / swales to allow greater use of existing landscaped areas for biodiversity enhancement on site.

CONCLUSION

UES were instructed early in the design programme to identify the key ecological constraints on site and ensure that the highest quality habitats were retained as part of the scheme design, and that impacts on protected species has been minimised to the lowest practicable level. Discussions have taken place with the local planning authority ecologist and comments provided have been used to inform layout and landscaping. Though the implementation of the step-wise approach, habitat retention has incorporated into the proposals, with higher quality habitats prioritised for retention, including a trees, woodland and a small area of semi-improved grassland. The retention and enhancement of green corridors along the site boundaries will contribute to the green infrastructure network onsite, promoting the natural distribution of species, and linking the site with the wider landscape. The further long-term management and maintenance of an offsite area of woodland will provide further ecological enhancement within to the local area. The proposed development will contribute towards the maintenance of a resilient ecological network, through both onsite and offsite measures, providing maximum benefit for biodiversity. In addition, inter-related decisions on the retention, loss and compensation for trees and management of water resources and drainage dovetails with the approach to habitat enhancement, contributing to the wider green infrastructure.

In summary, the proposed development provides a significant net benefit for biodiversity ensuring that ecological resilience is maintained within the wider landscape.

Yours sincerely,

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