

Green Infrastructure Statement

As a result of updated National Planning Policy for Chapter 6 of Planning Policy Wales, a Green Infrastructure Statement is a requirement of all planning applications.

Plan Red has prepared this Green Infrastructure Statement in support of its planning application, reference P/2023/0387, for an extension to a warehouse unit at F Lloyd, Wrexham Industrial Estate. This letter has been produced drawing on evidence from United Environmental Services Ltd (UES), LK Group and Shape Consulting Engineers Ltd in support of the proposals.

Introduction

The application was made in 2023. It is an application to erect a 1,120 sqm extension to the front of an existing large warehouse in B8 storage use as part of the wider F Lloyd (Penley) Ltd site. The extension is positioned on an area of existing hardstanding which is part of a larger yard to the front of the existing premises.

The site is previously-developed land. The River Clywedog is situated to the southwest side elevation of the existing warehouse and meanders around to the southeast rear elevation. To the northwest the yard area ends in a steep, engineered embankment with further warehouse buildings beyond. To north east there is a further embankment leading to a yard area and warehouses beyond, and further along the side elevation to northeast this gives way to open land outside the F Lloyd site. Land to southwest and southeast along the river corridor has a number of trees / woodland present. The land to northeast outside F Lloyd site is a mix of scrub and grassland with some tree groups within.

UES provided as part of the application proposals a Preliminary Ecological Appraisal (PEA). The survey identified the potential impacts on protected or otherwise notable species and habitats, including amphibians, bats, hedgehogs, invasive species, otters and water vole, plant communities and watercourse. Recommendations for mitigation and compensation measures required to protect these ecological receptors are detailed within the PEA report.

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 proposals... 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 proposed development is focused onto the existing hardstanding thereby avoiding and minimising potential impacts on any habitats surrounding the site.

As the proposal will not directly impact any habitat it is unnecessary to provide compensatory habitat areas, but the proposals provide for measures to minimise and mitigate impacts that arise.

Though the site is not considered likely to prove detrimental to Great Crested Newt (GCN) population known to exist in the wider area, the GCN Method Statement, (UES03411/07), puts forward recommendations to mitigate potential harm in site preparation and construction. The measures are set out within part 2 to the Method Statement.

No direct impacts are proposed on the River Clywedog through development. Control measures during construction will be put in place, to be agreed with the LPA and statutory bodies, to ensure all machinery brought to site is clean to prevent potential contamination of the watercourse and a buffer zone formed at the site boundary. No operational impacts are envisaged.

The existing buildings are considered to have negligible ability to support roosting bats and the existing site has very-low foraging and commuting opportunities due to present use / activity, although the adjacent river corridor and habitats offer superior opportunities.

Construction impacts will be mitigated through prevention of inappropriate lighting, particularly to light spill to the River Clywedog. Enhancement opportunities envisage the provision of bat boxes on site and control of any lighting of the extension (and existing unit) along the southwest elevation toward the river.

Numerous hedgehog records have been identified in the local area and droppings observed on site. Reasonable avoidance measures (RAMs) are proposed to mitigate potential impacts during construction as set out in the PEA (4.2.4).

Otter and water vole records were returned for the River Clywedog though no habitats are within the development area and are not directly affected. Indirectly reasonable avoidance measures (RAMs) can mitigate potential harm through no night working and external lighting of the river bank, (PEA 4.2.5).

No invasive species have been identified but it is proposed that best practices are followed set out in the Biosecurity Risk Assessment (UES03411/08) for the contractors to follow.

No impacts are predicted through construction or operation to species-rich grassland (TN6) that lie outside the development area.

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

Trees

There are no trees within the application site or directly affected by the proposed development.

Water resources

A Flood Consequences Report was prepared by LK Group in support of the proposals and detailed drainage design by Shape Engineering. The proposed extension will be located in Zone A (Fluvial Flood Zone 1), though part of the existing building to the rear is in Flood Zone 2, but unaffected by the proposal. Mitigation is only required in the setting of the finished floor levels to no lower than the existing set and the extension will not result in change or reduction in flood plain storage. The extension will drain into existing surface water drains present.

Conclusion

Through the commissioned reports and approach the design of the proposal has accommodated site constraints and taken all reasonable steps to avoid, minimise and mitigate potential harm to matters of ecological importance. This has been supported through consultation with the planning authority and statutory bodies, leading to recommendations for mitigation measures and RAMs. Long-term the proposed extension will lead to no material harm to the environment and will provide, albeit limited, opportunities to enhance habitats through new bat boxes and removal of light spill to the River Clywedog.

Yours faithfully,

Richard Purser, Director
Plan Red Ltd