



DATE: 19th November 2024

SITE: Bridgeway Centre, Wrexham Industrial Estate

REFERENCE: UES03012/16

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.

United Environmental Services Ltd (UES) was commissioned by FI Facilities Management Ltd to produce a Green Infrastructure Statement for the proposed development at The Bridgeway Centre, Wrexham Industrial Estate, Wrexham. This letter has been prepared with support of planning consultant, Plan Red Ltd, drawing on the evidence prepared by MD Landscape, and Barnsley Marshall in support of the planning application P/2022/0065 and inter-related matters of landscaping, arboriculture and water resources.

INTRODUCTION

The application was originally made in 2022 and since its submission the site has been subject to consented demolition of most of the existing buildings, except for Block B retail units. The nature of the detailed and outline proposals has been amended in updated drawings submitted in November 2024; and reflects upon previous comments and discussions with Council ecology and tree officers. In particular, the amended proposals now retain several mature trees within the outline development area and extend the proposed onsite landscape / ecology mitigation areas (retained, new and enhanced) to inform both the detailed and outline aspects of the proposals.

The applicant is seeking to obtain planning permission to create a new contemporary styled employment / business park comprising a number of blocks split into smaller units, designed for occupation by a wide range of businesses and enterprises across Use Classes B1, B2 and B8. Existing retail, service, food and drink units within Block B fronting Coed Aben Road will be retained / refurbished as part of the proposals. A hybrid planning application has been made (P/2022/0065) with the area and units in Blocks B to E in detail and Blocks F to J in outline (all matters reserved except means of access).

The proposed development site predominantly comprises buildings, hardstanding and amenity grassland lawns. There are also small areas of introduced shrub, species-poor hedgerows, plantation woodland, dense scrub and semi-improved grassland. An unnamed brook and plantation woodland are located immediately adjacent to the north-western site boundary.

A suite of ecological surveys has been undertaken of the site by UES, to inform the planning application. These included an initial and an updated Preliminary Ecological Appraisal (PEA), bat scoping and bat presence / absence surveys. These surveyed identified potential impacts on protected or otherwise notable species and habitats, including amphibians, bats, breeding

birds, hedgerows and trees, woodland, watercourse and invasive species. 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 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 woodland, 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 measures have been proposed and the landscaping scheme has been designed following engagement with UES. Green corridors along the site boundaries have been prioritised for retention as part of the scheme design, which will support protected species, ensuring the impacts on these species is avoided or minimised.

Prior to development, connectivity across the south-eastern and south-western aspects is limited to corridors of intensively managed amenity grassland or thin strips of ruderal vegetation. The proposals will ensure the enhancement of ecological corridors at these boundaries through the retention of woodland and veteran oak trees and through native species planting. This planting will include woodland, trees, native species-rich hedgerows, swales and wildflower grassland. Whilst some trees and areas of scrub vegetation are to be removed, these areas are limited in size and extend into the centre of site. As such, their removal will not result in the fragmentation of habitats or the breakage of ecological corridors.

In addition to the retained and enhanced corridors at the boundaries, a wide corridor of woodland that lies offsite to the north-west will be retained and unaffected by the proposals.

The proposed habitat creation and enhancement measures, in addition to a long-term management plan has been provided in the Landscape and Ecology Management Plan that has been prepared for the site (see report reference UES03012/19).

In addition to the onsite habitat creation and enhancement measures, part of a block of woodland located with the immediate vicinity of the site 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. Two potential bat roosting features have been identified within trees on site. Following changes to the site layout, both features are due to be retained and protected as part of the proposals.

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 an amphibian hibernaculum.

The invasive species small-leaved cotoneaster *Cotoneaster microphyllus* and giant hogweed *Heracleum mantegazzianum* are present on site, both of which will be subject to control measures and will be eradicated as part of the development. The giant hogweed is beginning to spread offsite and the eradication of both species will prevent these invasive species from spreading and impacting both onsite and offsite habitats in the future.

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. Furthermore, the proposed development boundary has been extended to incorporate part of an adjacent offsite parcel of woodland to the east. This woodland will be retained and subject to enhancement measures and ongoing management and monitoring.

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 inform the development proposals. An Arboricultural Impact Assessment and Method Statement 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 (see report reference 197/R/400, 06/11/2024).

WATER RESOURCES

A Flood Risk Assessment and Drainage Report has been prepared by Barnsley Marshall in support of the proposals. Technically the development will control surface water runoff to greenfield rates with allowance for climate change and storm events. A Sustainable Drainage System (SuDS) hierarchy has paralleled the step-wise approach advocated in green infrastructure. It identifies viable options and recommendations to include the use of permeable pavement, flow control devices, storm catchpits and swales. The identified options lead to full onsite compensation of the impact of the development.

Design of the drainage options has been iterative and revised with the scheme proposals, including confirmation in 2023 that Five Fords WwTW has capacity to accommodate the proposals in its revised environmental permit for phosphates. The design options has been coordinated with revisions for the greater retention of onsite trees and hedgerows, including reduction in the future developable area of the outline element of the proposals to reach an optimum design solution.

CONCLUSION

UES were instructed early in the design programme to identify the key ecological constraints on site, to 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.

Consultation has taken place with the local planning authority ecologist and comments provided have informed layout and landscaping. Though the implementation of the step-wise approach, habitat retention has been incorporated into the proposals, with higher quality habitats prioritised for retention, including trees and woodland. 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. In addition, the long-term management and maintenance of an offsite area of woodland will provide further ecological enhancement 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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