

Title	Erection of Modular Classroom and Creation of Car Park, Henblas Road, Rhostyllen, Wrexham – Biodiversity Statement
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1 Introduction

Background

- 1.1 Wrexham County Borough Council (WCBC) has received planning consent (Ref. P/2023/0699) to erect a modular nursery classroom and create a car park on land off Henblas Road, Rhostyllen, Wrexham (Approximate OS Grid Ref. SJ 3134 4875). The development is located immediately to the north of Ysgol Rhostyllen and will form part of the education facilities at this site.
- 1.2 The planning consent is the subject of five planning conditions. Condition 5 is as follows:
'No development shall commence until a detailed plan to provide net benefit for biodiversity (NBB) has been submitted to and approved in writing by the Local Planning Authority. The measures shall be fully implemented as approved prior to the first beneficial use of the development and shall be retained thereafter for the lifetime of the development'.

This Statement (along with an associated plan) seeks to provide the information required to discharge this condition.
- 1.3 The plot of land within which the development will be constructed previously contained a residential dwelling named 'The Bungalow'. This building along with several other structures was demolished in July 2023. The site was cleared and levelled at the same time. A Preliminary Ecological Appraisal (PEA)¹ and bat Preliminary Roost Assessment (PRA)² were included as supporting information to the submission of the 'Notice of Intended Demolition' (*Building Act 1984, Sections 80-83*). The PEA and PRA included a number of proposed ecological enhancement measures.
- 1.4 The enhancement measures proposed due to the demolition were agreed with WCBC's Ecology and Biodiversity Officer. These enhancement measures along with those proposed due to the construction of the new classroom and car park are presented on [Ref. [soft landscaping plan](#)]. Further details with regards the enhancement measures associated with the new development are provided in this Statement. The PEA and PRA should be consulted for further details on the enhancement measures associated with the demolition.

¹ Marches Ecology (2023). *Proposed Demolition of The Bungalow, Henblas Street, Rhostyllen, Wrexham – Preliminary Ecological Appraisal*. Produced on behalf of WCBC.

² Marches Ecology (2022). *Proposed Demolition of The Bungalow, Henblas Street, Rhostyllen, Wrexham – Preliminary Roost Assessment/ Nesting Bird Assessment*. Produced on behalf of WCBC.

1.5 This Biodiversity Statement includes the following:

1. Identification of locations and opportunities for potential ecological enhancements.
2. Demonstration of how net benefit for biodiversity (and ecosystem resilience) will be secured and maintained. Full details of the recommended ecological enhancements.

1.6 This document has been produced by Marches Ecology to provide the above information.

Site Description

1.7 No site visit has been undertaken as part of this commission. The site was cleared in the summer of 2023.

The Proposal

1.8 The proposed development is presented on a series of plans by Elite Systems GB Ltd including the following:

- 'Site Plan', dwg. no. 200315-ELT-00-00-DR-A-1100 Rev. C, dated 26/05/23.
- 'Elevations', dwg. no. 200305-ELT-00-00-DR-A-2000 Rev. F, dated 14/10/21.
- 'Proposed Car Park Layout', dwg. no. 200315-ELT-00-00-DR-A-1200 Rev. D, dated 20/02/24.

1.9 The proposed development includes the erection of a modular steel frame single-storey building. The footprint of this building measures 15.4 m by 8.4 m, approximately 129.36 m². The building height from ground level is approximately 2.98 m.

1.10 The new building will be linked to the existing School via a new hard-surfaced footway. To the west of the building there will be new hard play and grass areas. The new car park (with 23 bays) will be created in the northern end of the site with vehicular access onto Henblas Road. A new fence (2.4 m high) will be installed on the boundary. Further information is provided in the Design and Access Statement³.

³ Elite Systems GB Ltd (2023). *Rhostyllen, Wrexham C.C. – Design and Access Statement*.

2 Biodiversity Enhancement

Introduction

- 2.1 Technical Advice Note 5 (Nature Conservation and Planning) (Welsh Assembly Government, 2009)⁴ and Wrexham County Borough Council (2011)⁵ seek developments to achieve net biodiversity gain. The requirement to secure and maintain net benefit for biodiversity (NBB) (through enhancements) was reinforced in a letter issued by the Chief Planner (Welsh Government) to all planning departments in October 2019. NBB has been defined as *'the concept that development should leave biodiversity and ecosystems in a better state than before, through securing long term, measurable and demonstrable benefit, primarily on site.'*⁶
- 2.2 This was reiterated in a letter from the Minister for Climate Change to the Heads of Planning dated October 2023. An Annex⁷ attached to this letter provided text to update Planning Policy Wales (PPW). Subsequently, Chapter 6 of PPW has been updated as of 11/10/23 which provides *'further clarity on securing net benefit for biodiversity through the application of the step-wise approach, including the acknowledgement of off-site compensation measures as a last resort, and, the need to consider enhancement and long-term management at each step.'*
- 2.3 WCBC (2011) lists *'examples of how enhancements could be achieved on development sites'*. The options provided include planting native trees of local provenance and provision of bird-boxes. CIEEM (2022) states that *'a key requirement is that the measures put forward are suitable in the local context of the site'*⁸.
- 2.4 The following enhancement measures are proposed:
- Five *Betula pendula* (Silver Birch) trees will be planted. The seed produced by these trees will provide a potential food source for birds such as the Goldfinch (*Carduelis carduelis*), Siskin (*Carduelis spinus*) and Lesser Redpoll (*Carduelis cabaret*). The Lesser Redpoll is a priority species.
 - Spring- and autumn-flowering Crocus bulbs will be planted to provide a possible source of nectar for pollinating insects.
 - Two areas will be sown with a 'Meadow Lawn' mix to provide further opportunities for insects.

⁴ Welsh Government (2009). *Planning Policy Wales - Technical Advice Note 5: Nature Conservation and Planning*. September 2009.

⁵ Wrexham County Borough Council (2011). *Local Planning Guidance Note 32 Biodiversity and Development*. Adopted March 2011.

⁶ <https://www.gov.wales/targeted-policy-changes-planning-policy-wales-net-benefit-biodiversity-and-ecosystems-resilience>

⁷ 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.

⁸ CIEEM (2022). *Welsh Government's Approach to Net Benefits for Biodiversity and the DECCA Framework in the Terrestrial Planning System*. CIEEM Briefing Paper September 2022. CIEEM, Romsey.

- Eight nest-boxes for the House Sparrow (*Passer domesticus*) will be attached to the new building. The House Sparrow is a priority species listed on *Section 7* of the *Environment (Wales) Act 2016*⁹.

Assessment of Required Level of Provision

- 2.5 The Bungalow and associated structures have previously been demolished. The garden of this property was cleared at the same time. Ecological enhancement measures have previously been agreed in relation to these works. This assessment therefore relates to the site in its existing state and in relation to the new building and car park to be constructed.
- 2.6 Construction of the new building and car park can be categorised as a small/ low impact proposal. Development of this site would not result in a significant impact on any valued ecological resource at this location.
- 2.7 NBB provision '*should be proportional to the extent and impact of development*' (CIEEM 2022). The proposed enhancements will therefore target a priority species known to be present in the area as well as increasing the general biodiversity value of the site.

Biodiversity Enhancement Recommendations

Planting Native Trees

- 2.8 Two *Betula pendula* (Silver Birch) trees will be planted on the Henblas Road frontage, to the west of the vehicle access point. They will be positioned so as not to interfere with the new boundary fence and the visibility splay. A further cluster of three Silver Birch trees will be planted in the new area of grassland to the west of the new building. [Ref. soft landscaping plan].
- 2.9 The Silver Birch trees can be sourced from the Woodland Trust¹⁰. The Woodland Trust website confirms that all of their trees are sourced and grown in the UK. If vandalism may be an issue for the tree by Henblas Road, located outside the fence, then a larger tree specimen may be required and/ or a metal tree guard considered. The trees will need to be staked and fitted with strimmer guards¹¹.
- 2.10 The trees should be checked annually by Wrexham County Borough Council. Any losses will be replaced. Some maintenance including possibly watering, may need to be undertaken during establishment.
- 2.11 The trees will be planted between November and March. They will be planted in accordance with the advice provided by the Woodland Trust¹².

Planting Crocus Bulbs

- 2.12 The proposed trees by Henblas Road will be under-planted with spring- and autumn-flowering Crocus, as will the small area of grassland to the east of the vehicle access point. The spring-flowering Crocus would be *Crocus tommasinianus* (Early Crocus)¹³. Seventy-five bulbs will be planted across the two areas. This Crocus flowers from February to March and will provide an important food source for early-flying insects.

⁹ HMSO (2016). *The Environment Act (Wales) 2016*. HMSO, London.

¹⁰ <https://shop.woodlandtrust.org.uk/silver-birch>

¹¹ <https://www.green-tech.co.uk/tree-planting-products/tree-protection-and-shelters/premium-strimmer-guards>

¹² <https://www.woodlandtrust.org.uk/plant-trees/advice/how-to-plant/>

¹³ https://www.crocus.co.uk/plants/_/crocus-tommasinianus/classid.1000000372/

- 2.13 The autumn-flowering Crocus would be *Crocus speciosus* (Autumn Crocus)¹⁴. Ninety bulbs will be planted across the two areas. This Crocus flowers from September to November and provides late foraging bees with an additional food source.
- 2.14 The bulbs should be planted in naturalistic drifts at a depth of approximately 5-10 cm with the shoots facing upwards. Individual bulbs should be at least 7-8 cm apart. Planting should be undertaken between early September to November. This could be undertaken in conjunction with the school children. First flowering would be in the following year.
- 2.15 The grass should not be cut until the Crocus leaves have died back. The planted area will need to be defined with some kind of marker posts to minimise the possibility of inadvertent mowing. The grass in the planted area will need to be cut when the Crocus plants have died back, e.g. during the summer.
- 2.16 If Squirrels become a problem (eating the bulbs) chicken wire may need to be installed over the bulbs. This would also prevent dogs from digging them up.

Creation of the 'Meadow Lawn'

- 2.17 The two small areas of grassland located either side of the vehicular access off Henblas Road will be sown with the Meadowmania '*British Native Meadow Wildflower Seeds for Meadow Lawns*'¹⁵. This mix contains 12 native species of wildflower and seven native grasses. It is designed to create a diverse lawn that can tolerate close mowing to a height of 5 cm for most of the year. The mowing should be stopped for a period during the summer to allow for flowering. Flowering can be from May to September but mowing does not need to be stopped for this entire period.
- 2.18 The seed should be sown in the spring (March-May) or the autumn (late August to October). Advice will be obtained from the supplier on ground preparation, how and when to sow. As it is a relatively small area it may be most appropriate to sow by hand. The recommended sowing rate is 4g/m².
- 2.19 An appropriate management regime will be reviewed after the grassland has established. It is likely that a greater amount of management will be required during the establishment phase. Advice on appropriate management would also be sought from the supplier.

Bird-boxes – House Sparrow

- 2.20 It is proposed to erect eight double chamber Vivara Pro Woodstone House Sparrow nest-boxes¹⁶ onto the building. This would provide potential nesting opportunities for at least eight pairs of House Sparrow. These nest-boxes would be attached to the outside of the building at eaves level beneath the guttering.
- 2.21 The nest-boxes should be attached to the eastern elevation. This elevation contains no windows or doors and faces out onto adjacent gardens. The nest-boxes should be installed as high above ground level as possible, ideally out of direct sunlight, and at least 1 m apart. They should have unobstructed access and should not be located directly above the AC condenser. They should be placed in locations where droppings will not cause future nuisance, though it is likely that most faecal matter will be removed from the immediate area around the nest-box by the parent birds.

¹⁴ https://www.crocus.co.uk/plants/_/crocus-speciosus/classid.1000000347/

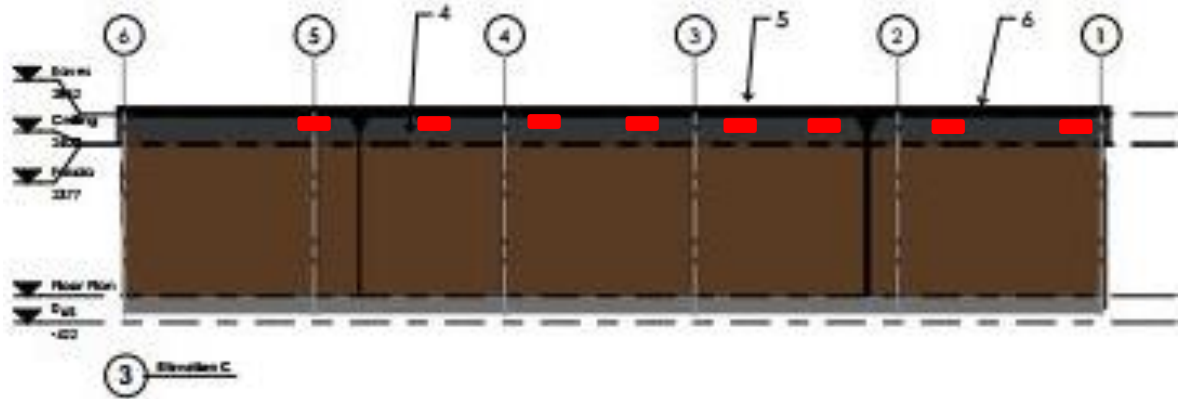
¹⁵ <https://meadowmania.co.uk/products/wildflower-meadow-for-lawns>

¹⁶ <https://www.nhbs.com/vivara-pro-woodstone-house-sparrow-nest-box>

- 2.22 The approximate locations for the eight nest-boxes on the east elevation are shown on the plan reproduced below¹⁷ (*Figure 1*) with the approximate locations for the nest-boxes indicated by red rectangles. They would be located approximately 15 cm below the gutter.

Figure 1 – Approximate Locations of Sparrow Nest-boxes on East Elevation

Note: Locations are approximate, distances between the boxes and to the gutter are not accurately represented.



Maintenance and Monitoring

- 2.23 The importance of securing long-term management/ maintenance and monitoring is central to the NBB approach (e.g., CIEEM 2022). This should also be proportional to the scale and impact of the development.
- 2.24 The newly planted trees, Crocus bulbs and Meadow Lawn should be checked annually by Wrexham County Borough Council as part of the ongoing maintenance of the School grounds. The trees may need some aftercare until they are properly established and any losses will be replaced. The Crocuses are unlikely to require aftercare other than the implementation of an appropriate mowing regime. The installation of chicken wire to protect the bulbs may be required. Aftercare of the Meadow Lawn should be in accordance with the supplier's instructions.
- 2.25 Each Sparrow nest-box should be inspected annually and cleaned if necessary. This can be undertaken by WCBC or the School. All maintenance should be carried out when the last bird has left the nest-box; at least October. As such all nest-boxes should be cleaned in late-autumn (late October/ November). At least 2 to 3 weeks should be allowed after fledging before undertaking any cleaning. The *Wildlife and Countryside Act 1981*, as amended states that cleaning should only be carried out between 1st August and 31st January and that any eggs present should be destroyed immediately. All nest material should be completely removed and disposed of safely along with any other debris. To ensure that parasite build-up is controlled the inside of the nest-box should be cleansed with water. Care should be taken when opening nest-boxes as it is possible that they could be inhabited by bees, wasps or even bats.

¹⁷ Image taken from the Elite Systems GB Ltd. plan entitled '*Elevations*', dwg. no. 200305-ELT-00-00-DR-A-2000 Rev. F, dated 14/10/21.

- 2.26 The use of any of the nest-boxes by House Sparrows (or any other species) should be recorded during the nesting season (March to August inclusive). House Sparrows typically raise two to three broods a year, usually between April and August. Records of nesting birds should be submitted to Cofnod¹⁸ (the Local Environmental Records Centre for North Wales). This could again be undertaken in conjunction with some of the children.

¹⁸ <https://www.cofnod.org.uk/Home>