

Green Infrastructure Statement

Land off Bridge Rd North, Wrexham Industrial Estate

JCP Investments Ltd propose to develop a parcel of land off Bridge Road North for a proposed Storage and Distribution Unit. This will include revisions to the existing site access, a new warehouse building, car parking, turning area and ancillary infrastructure.

This Green Infrastructure Statement has been prepared by Etive Ecology Ltd to inform the planning application. The statement reflects the guidance and requirements outlined in Chapter 6 of Planning Policy Wales (PPW); relating to distinctive and natural places.

The application site has been subject to a suite of ecological surveys and assessments, from 2021 to 2024. These have comprised a preliminary ecological walkover in July 2021, an Extended Phase 1 Habitat Survey in February 2022, bat detector surveys in May 2022, detailed botanical survey and butterfly transects in May-July 2024. The site and immediately adjacent land have been concluded to support the following key ecological features;

- Species-rich unimproved grassland.
- Extensive swathe of spiny retharrow within the grassland area.
- Grizzled skipper and dingy skipper butterflies (not recorded on site by Etive Ecology in 2024).
- Terrestrial habitat likely to support GCN.
- Part of Wrexham's Strategic Ecological Network (as identified in the LDP).

The main body of the site was found to be an area of grassland that has no current management strategy or plan. Part of the site is allocated for development and part is allocated within a Strategic Ecological Network (SEN). The existing habitat contributes to the retention of carbon (through grassland, scrub, tree growth), the retention of surface water runoff and prevention of sediment mobilisation (through the retention of surface vegetation and the permanent cover of subsoils), local population of protected species (GCN, butterflies, retharrow) and as a stepping stone habitat through the Wrexham Industrial Estate. It is noted that the site is cleared of vegetation every few years, to prevent tree and scrub encroachment, which adversely impacts the ecosystem services described above.

The proposed scheme seeks to follow the Step-Wise Approach as detailed within the updated Chapter 6 of PPW.

1. **Avoid**; the layout of the development footprint has been located such that it avoids the core area of spiny retharrow and allows ~55% of the existing grassland to be retained. The footprint also avoids the SEN and allows for additional linkage/connectivity between existing parts of the SEN by leaving the southeast portion of the site as grassland.
2. **Minimise**; By shifting the development footprint, impacts on grassland, spiny retharrow, GCN and butterflies have all been minimised. The grassland area being lost is considered to be the least species-rich and where the least encounters of butterflies or spiny retharrow were found. Existing areas of hard-standing have also been retained and incorporated into the design, to minimise the land take of existing grassland.

3. Mitigate; the retention of a large block of grassland allows for impacts to be effectively mitigated, through the management of a large block rather than of several smaller portions of habitat. The grassland is to be managed through a long-term habitat management plan, which will enhance grassland condition and composition, and will deliver benefits for GCN and butterflies. The design of the layout will also deliver benefits to the SEN, which in turn will benefit biodiversity more broadly across the WIE.
4. Compensation; no compensation for biodiversity impacts are considered to be necessary, given the beneficial biodiversity impacts anticipated from the proposed scheme once mitigation measures are implemented. As noted, above, appropriate and proportionate mitigation has been delivered on-site through habitat creation, enhancement and long-term management. The provision of any off-site habitat in relation to GCN is not considered to be proportionate or necessary, given the retention, enhancement and long-term management of 55% of the existing habitat on site.

The proposed scheme recognises the need to achieve a Net Benefit for Biodiversity and following on from 2024 surveys this has been built into the planning of the project. It is recognised that the footprint of the scheme removes ~0.6ha of unimproved grassland which is considered to support various ecological features. However, it is noted that there is currently no management plan in place to secure the sensitive or appropriate management of the site, such that ad-hoc management is likely to pose a negative impact every 3-5 years. Scrub encroachment and self-seeded trees were identified during 2024 surveys as posing a risk to the grassland habitat in terms of its species composition and its ability to support grizzled and dingy skippers. It is considered that the retention, protection and long-term management of 55% of the existing grassland on site will provide an opportunity to significantly increase the biodiversity value of this site and its effective contribution to the Strategic Ecological Network. The area proposed for long-term management will be subject to initial enhancements (scrub clearance, specimen tree planting, hibernacula creation) and long-term conservation management.

The proposed ecological enhancements fit with the DECCA Framework by;

1. Increasing diversity within local ecosystems by providing a species-rich grassland under low intensity management. This will offer a habitat that is rare in the local area and will therefore have the potential to support a different and more diverse assemblage of species. Crucially, this habitat will be secured for long-term management and monitoring.
2. Increasing the extent/scale of ecosystems by providing a single large block of habitat, rather than small and discreet parcels of land. The proposed site links in with the existing Strategic Ecological Network (SEN), therefore extending the scale of existing ecosystems and green infrastructure.
3. Improving the condition of ecosystems by bringing the site under long-term conservation management, to be specified within a Habitat Management Plan with clearly defined aims, actions and targets.
4. Improving connections within and between ecosystems, by identifying the SEN and incorporating it into the site design. This links field boundaries and blocks of undeveloped land

that cross the industrial estate and forms a key area of habitat and facilitates greater ecological functionality at the local scale.

5. Improving ecosystem resilience and adaptability to future pressures, through the planting of trees (carbon capture, shading), the management of surface water runoff (continued vegetation cover, SUDS) and the creation of new habitat features capable of offering niche habitats to a wide range of flora and fauna.

Therefore, as a result of the ecological measures embedded within the proposed scheme, it is expected that there will be a demonstrable net benefit for biodiversity. The site has been identified as being of relatively high value, but that immediate on-site impacts can be adequately mitigated on-site and that net gain can also be achieved through on-site measures. All habitats retained/created/enhanced on site will be subject to a long-term Habitat Management Plan, with defined biodiversity targets and key performance indicators.