

Title	Proposed Portacabin (Occupational Health Facility), Kellogg's, Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9UT – Net Benefit for Biodiversity Statement
Date issued	01st December 2023
Author	Max Ellson
Reviewed by	Tom Knight
Client	Kellogg's GB
Report Version	C531/ V1.0

1 Introduction

Background

- 1.1 Kellogg's GB has secured planning consent (Ref. P/2023/0666) from Wrexham County Borough Council (WCBC) for installation of a single storey modular building (or portacabin) at the Kellogg's complex adjacent to Bryn Lane, Wrexham Industrial Estate, Wrexham, LL13 9UT (approximate OS Grid Ref. SJ 3889 5059).
- 1.2 Condition 5 of the consent states the following:
- 'No part of the development shall commence until a plan to provide net benefit for biodiversity (NBB) i.e. a better outcome than if the site was left undeveloped has been submitted to, and approved in writing by, the Local Planning Authority. The measures shall be implemented in full, prior to first occupation/ use of the development, and thereafter maintained for the lifetime of the development.'*
- 1.3 The requirements of the NBB Statement, and potential relevant options for NBB, were discussed with WCBC's Ecology and Biodiversity Officer in advance, and it was agreed that the NBB Statement would include the following:
1. A brief description and assessment of the existing habitat to be impacted by the proposed portacabin.
 2. Identification of locations and opportunities for potential ecological enhancements.
 3. Demonstration of how NBB (and ecosystem resilience) will be secured and maintained. Full details of the recommended ecological enhancements.
- 1.4 This document has been produced by Marches Ecology to provide the above information¹.

Site Description; Proposed Development Site

- 1.5 A site visit was undertaken on 30th November 2023 by Max Ellson of Marches Ecology. The weather during the visit was bright sunshine with little cloud cover and a light breeze. There had been a heavy frost the preceding night which remained in shaded areas. One of the purposes of the visit was to broadly characterise the existing ecological resource and vegetation associated with the footprint of the proposed portacabin (the proposed development site).

¹ The NBB recommendation as included within this document has been discussed and agreed with WCBC's Ecology and Biodiversity Officer by email and 'phone on 01st December 2023.

- 1.6 An Extended Phase 1 Habitat Survey or other similar ecological survey has not been undertaken. The brief description provided below is based entirely on information collected during the site visit.
- 1.7 The portacabin will be installed to the immediate east of the main Kellogg's building, on part of an area of frequently maintained amenity grassland, surrounded by existing built infrastructure. At the time of the site visit the grassland appeared to have been recently mown, the sward height largely being to 0.05 m.
- 1.8 The sward comprises a number of grasses including co-dominant *Lolium perenne* (Perennial Rye-grass) and *Festuca rubra* (Red Fescue), frequent *Holcus lanatus* (Yorkshire-fog), and less amounts of *Agrostis capillaris* (Common Bent) and *Poa annua* (Annual Meadow-grass). A variety of characteristic forbs and (tall-)herbs are scattered throughout at various levels of abundance, such as: frequent/ abundant *Ranunculus repens* (Creeping Buttercup), frequent *Bellis perennis* (Daisy) and *Prunella vulgaris* (Self-heal), occasional/ locally frequent *Cerastium fontanum* (Common Mouse-ear), *Achillea millefolium* (Yarrow), *Potentilla reptans* (Creeping Cinquefoil) and *Trifolium repens* (White Clover), occasional *Plantago lanceolata* (Ribwort Plantain), *Leucanthemum vulgare* (Oxeye Daisy) and *Taraxacum* sect. *Ruderalia* (Common Dandelion), and less amounts of *Veronica persica* (Common Field-speedwell), *Plantago major* (Greater Plantain), *Cirsium arvense* (Creeping Thistle), *Jacobaea vulgaris* (Common Ragwort) and *Rumex obtusifolius* (Broad-leaved Dock).



Above and Below. Views of the amenity grassland at the proposed development site.



The Proposal

- 1.9 The boundary (solid red line) of the proposed development site is shown on a Portakabin plan entitled '*Proposed Block Plan*', drawing No. TM423063769, dated 18th August 2023. Further detail is also provided on a *pdf plan, File ref: 'Cabin Location On site'.
- 1.10 The floor plan and external elevations for the new portacabin are presented on a Portakabin plan entitled '*Occupational Health Building – Proposed Layout, 2 x UK123 Ultima Module Building*', drawing No. HD/13381/01_RevF, dated 14/11/23. The building will be approximately 12.2 m long and 6.8 m wide. The internal floor area will be approximately 78 m², with the external footprint to approximately 82 m².

2 Biodiversity Enhancement

Introduction

- 2.1 Technical Advice Note 5 (Nature Conservation and Planning) (Welsh Assembly Government, 2009)² and Wrexham County Borough Council (2011)³ 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'*⁴.
- 2.2 Subsequently, Chapter 6 of Planning Policy Wales 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'*⁵.
- 2.3 WCBC (2011, *op. cit.*) lists *'examples of how enhancements could be achieved on development sites'*. Further specific advice on options applicable to Wrexham Industrial Estate has been provided in an email from WCBC's Ecology and Biodiversity Officer (dated 27/11/23) which includes *'areas of grassland creation and improved management of existing (this should be the priority where land is available)'*. CIEEM (2022) states that *'a key requirement is that the measures put forward are suitable in the local context of the site'*⁶, and that NBB provision *'should be proportional to the extent and impact of development'*. This is reinforced in the WCBC email, which notes: *'biodiversity enhancement should be proportionate to the scale and nature of the development, it should improve connectivity and resilience of species and habitat considered important in and around the application site'*.

Assessment of Required Level of Provision

- 2.4 The proposed portacabin can be categorised as a small/ low impact development. The footprint comprises part of a larger area of frequently managed amenity grassland located within an area of existing built infrastructure. In its current condition the amenity grassland is of low/ negligible ecological value and is not close to other valued ecological resources. The loss of a small area (approximately 82 m²) of amenity grassland would not result in a significant impact on any valued ecological resource at this location.
- 2.5 Due to the location of this resource/ immediately adjacent areas being surrounded by existing built infrastructure, various options for habitat enhancement within the wider Kellogg's ownership boundary have been considered.

² Welsh Government (2009). *Planning Policy Wales - Technical Advice Note 5: Nature Conservation and Planning*. September 2009.

³ Wrexham County Borough Council (2011). *Local Planning Guidance Note 32 Biodiversity and Development*. Adopted March 2011.

⁴ <https://www.gov.wales/targeted-policy-changes-planning-policy-wales-net-benefit-biodiversity-and-ecosystems-resilience>

⁵ Summary taken from a letter from Julie James AS/MS (Minister for Climate Change) to all planning departments dated 11 October 2023.

⁶ 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.

- 2.6 In the email from WCBC's Ecology and Biodiversity Officer (dated 27/11/23) it is noted that: '*habitats and species which are distinctive and most important ...on Wrexham Industrial Estate*'.... include '*Species rich grassland and mixed mosaic habitats which are important for invertebrates primarily the Welsh Priority Species dingy and grizzled skipper*'. As such it is proposed that an area of frequently managed grassland on the western edge of the Kellogg's site will be managed in an appropriate way in the long-term. This proposed enhancement will target a larger area of grassland than that which is being lost. This enhancement will also assist in strengthening an existing habitat mosaic/ wildlife corridor in this part of the industrial estate; this is further discussed below.

Biodiversity Enhancement Recommendations

Ecology Area

- 2.7 It is proposed to establish an 'Ecology Area', approximately 350 m² in size, adjacent to the western edge of the Kellogg's site. The approximate boundary is indicated on *Figure 1*.



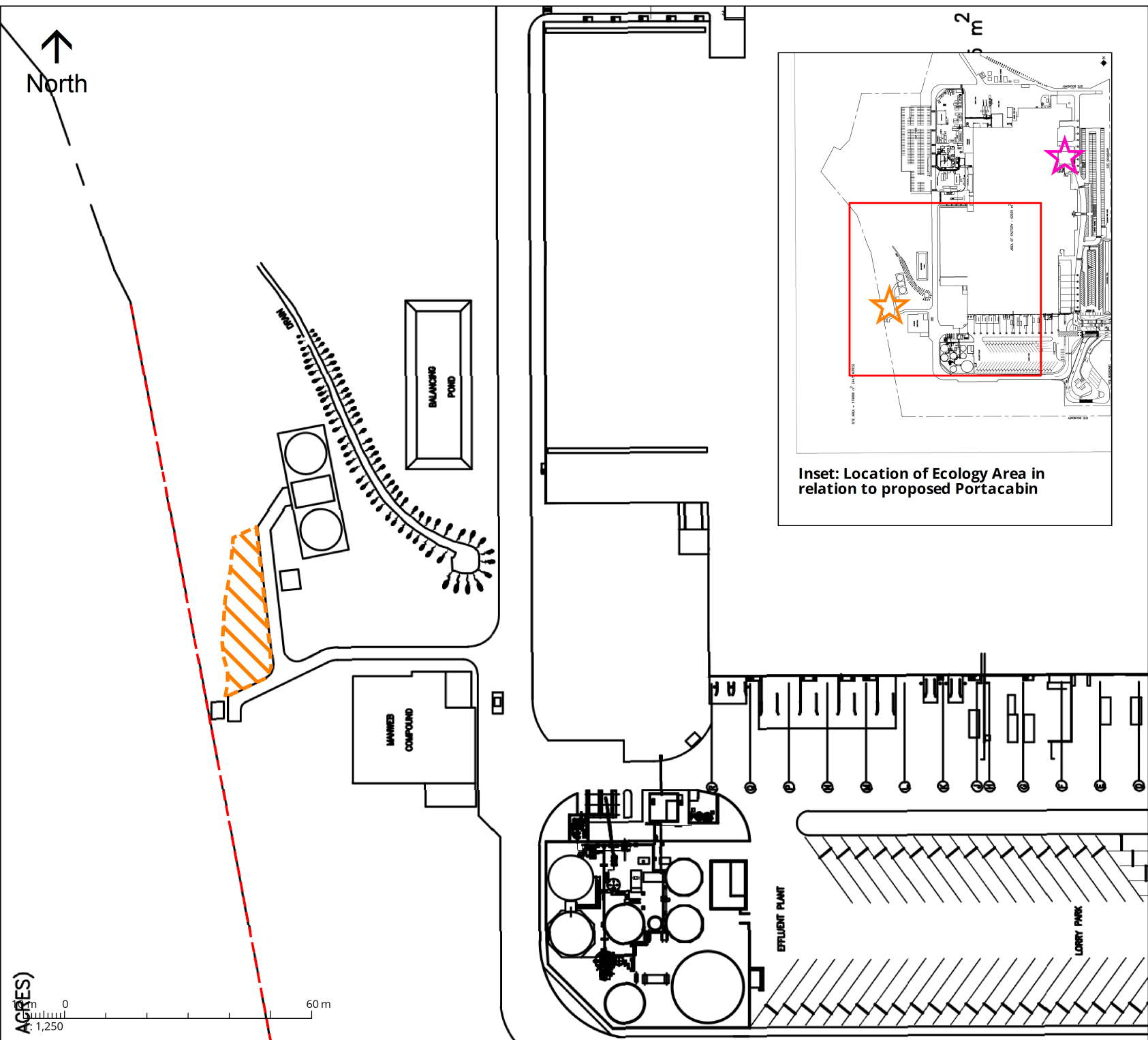
Existing amenity grassland in the 'Ecology Area'. Also showing adjacent scrub zone to west.

- 2.8 There is a narrow zone of mature/ unmanaged native scrub to the immediate west (adjacent to a fenced boundary) of the proposed 'Ecology Area'. To the south and north there are wider areas of scrub/ woodland (within the Kellogg's site). To the immediate west of the boundary fence at this location there is part of a Great Crested Newt (*Triturus cristatus*) mitigation area associated with Clwyd Compounders, with which Marches Ecology is involved in long-term management and monitoring (including for both Dingy Skipper (*Erynnis tages*) and Grizzled Skipper (*Pyrgus malvae*)). The 'Ecology Area' will assist in strengthening the connectivity and resilience of the semi-natural habitats (species-rich grassland and mixed mosaic habitats)/ and species which use them in this part of the industrial estate.

- 2.9 The 'Ecology Area' currently comprises an area of frequently mown/ disturbed amenity grassland. It is understood that it is mown 4x/ year. The existing sward was briefly characterised during the site visit on 30th November 2023. At the time of the site visit the sward height was variable, being occasionally to 0.1 m, although often less.
- 2.10 The sward comprises a number of grasses including co-dominant Yorkshire-fog and Red Fescue, frequent/ locally abundant *Dactylis glomerata* (Cock's-foot), frequent Common Bent, and less amounts of Perennial Rye-grass. A variety of characteristic forbs and (tall-)herbs are scattered throughout at various levels of abundance, such as: frequent/ locally abundant Yarrow, Oxeye Daisy, and *Centaurea nigra* (Common Knapweed), frequent Creeping Buttercup and Creeping Cinquefoil, occasional Common Ragwort, Daisy, Self-heal, Common Mouse-ear, White Clover, Ribwort Plantain, Common Dandelion, Common Field-speedwell, and *Lotus corniculatus* (Common Bird's-foot-trefoil), and less amounts of *Rumex acetosa* (Common Sorrel) and *Hypericum* sp. (a St. John's-wort).
- 2.11 The boundaries of the 'Ecology Area' are defined by hard-standing to the south and east, and mature scrub to the west. It is suggested that these boundaries do not need delineating further, although should it be deemed necessary a small number of low wooden posts (painted white) could be installed along the edge of the kerb. A short length of wooden post-and-rail fencing should be installed along the northern margin.
- 2.12 In addition, two weather-proof signs will be installed (likely one adjacent to both the eastern and southern kerb boundaries); they will read 'Ecology Area – No Access' or similar (with further text as deemed necessary, for example stating that the area is to be cut once a year in late August/ early September to 10 cm in height, and raked off after 24 hours; refer below).
- 2.13 Existing miscellaneous debris/ storage equipment within the proposed 'Ecology Area' should be removed.

Maintenance and Monitoring

- 2.14 The importance of securing long-term management/ maintenance and monitoring is central to the NBB approach (e.g., CIEEM 2022, *op. cit.*). This should also be proportional to the scale and impact of the development.
- 2.15 The grassland resource within the 'Ecology Area' will be cut once a year (in late August/ early September). The cutting blade should be set at a height of about 10 cm. The grass cuttings should be left in-situ and then raked off after 24 hours. All mowing will be completed in hot, dry conditions and not following overnight rain. Grass heaps can be created on the edge of the adjacent scrub. Such heaps should ideally be constructed over a base of criss-crossed coarse material such as branches or logs. Ideally the grass would be mixed with fine woody material.
- 2.16 Any litter should also be removed and properly disposed of at the same time.
- 2.17 The aim of this management will be to retain and/ or increase the botanical species-richness of the sward, whilst also providing nectar sources for a range of pollinators, and increasing the general value of the grassland for other wildlife, including priority species.
- 2.18 No monitoring is proposed.



-  Ecology Area
Approx. 350 m2. To be defined by posts/ permanent fencing, and signage as deemed necessary. Grassland to be cut once/ year in late August/ early September only & raked off. Refer to report.
-  Kellogg's ownership boundary
In vicinity of Ecology Area only.
- Inset:**
 -  Portacabin
 -  Ecology Area

C531 Proposed Portacabin (Occupational Health Facility), Kellogg's, Bryn Lane, Wrexham Industrial Estate, LL13 9UT - Net Benefit for Biodiversity Statement

Figure 1 - Proposed Ecology Area

Date: 01/12/2023



www.marchesecology.co.uk

Base mapping provided by the client.