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DATE: 24th January 2024

SITE: Kingmoor (Plot 3A), Wrexham Industrial Estate

REFERENCE: UES03448/34

Dear Gwyn,

GREEN INFRASTRUCTURE STATEMENT – ECOLOGY

As a result of updated National Planning Policy for Chapter 6 of Planning Policy Wales, a green infrastructure statement is now required to be submitted with all planning applications.

United Environmental Services Ltd (UES) was commissioned by FI Real Estate Management Ltd to produce a green infrastructure statement for a parcel of land at Kingmoor (Plot 3A), Wrexham Industrial Estate, Bryn Lane, Wrexham. This letter has been prepared with support of planning consultant, Plan Red Ltd, drawing on the evidence prepared by MD Landscape, PGLA and Bradley Marshall in support of the planning application P/2023/0280 and inter-related matters of landscape values of trees and hedgerows and water resources.

INTRODUCTION

The applicant is seeking to obtain planning permission for the construction of three industrial units with associated parking and access roads.

The main land parcel of the application site (i.e. excluding the “eastern field”) has an area of approximately 20.9ha and was formerly used for industrial and agricultural purposes, prior to being left unmanaged for several years. The site contains large semi-improved species-rich grassland fields interspersed with ponds, small stands of woodland, hedgerows and scattered trees. Large areas of the site have succeeded into dense scrub and areas of bare ground and ephemeral / short perennial are present on previously developed land within the south-eastern section of the site. The south-western section of the site contains an area of amenity grassland and a large hardstanding compound used to store vehicles. A shallow stream runs along the northern site boundary and wet ditches are present along the western and part of the eastern site boundaries.

Since the initial walkover survey, the application site boundary was amended to incorporate an additional 4.5ha of adjacent land (the “eastern field”). This land comprises two agricultural grassland fields that are divided and bordered by hedgerows and trees. A dry and unvegetated ditch runs along part of the eastern boundary and a pond surrounded by willow scrub is present within the northernmost field.

UES' Ecological Impact Assessment (reference UES03448/22) identified various impacts up to a county level due to the presence of habitats and species of principal importance, notably great crested newts (GCN) *Triturus cristatus*, butterfly species of principal importance, open mosaic habitat and unimproved neutral grassland.

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 proposal... 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

The layout for the site has been designed in conjunction with UES to incorporate significant habitat retention, including lowland meadow, open mosaic habitat on previously developed land and ponds, all of which are habitats of principal importance and support species of principal importance and have been prioritised for retention as part of the scheme design.

Lowland meadow and open mosaic habitat on previously developed land priority habitats

Areas of open mosaic habitat on previously developed land and lowland meadow is present in the southern section of site, which both qualify as habitats of principal importance under Section 7 of the Environment (Wales) Act 2016. These habitats are primarily of importance for the faunal and floral species that they support, particularly wildflowers and invertebrates. The proposed development size has been minimised to ensure that habitats of high biodiversity value are retained, which will continue to support biodiversity and functioning ecosystems, including species of principal importance.

Dingy skipper *Erynnis tages*, small heath *Coenonympha pamphilus* and grizzled skipper *Pyrus malvae* are listed as species of principal importance under Section 7 of the Environment (Wales) Act 2016, indicating that they are species of national importance. All three butterflies were observed using both the unimproved grassland and the open mosaic area; however, all three species showed a greater affinity for the open mosaic habitat. Despite the low number of individuals observed using the site, they may form part of a larger colony which spreads across pockets of suitable habitat within the Wrexham Industrial Estate, encompassing the known population at Wrexham Industrial Estate Wildlife Site.

The proposed development will ensure the long-term retention, enhancement and management of priority habitats on site, to ensure they maintain their structural diversity and ecological value. Without management these habitats would see a natural long-term reduction in value as a result of natural processes of succession e.g. scrub encroachment. As an additional ecological enhancement, two scrapes / shallow ponds and four sandy banks, which will specifically target invertebrates such as ground beetles, solitary bees and digger wasps, will be created within the open mosaic habitat.

The retention of the existing open mosaic and lowland meadow habitats will ensure that a resilient ecological network is maintained along the southern boundary linking the site with the ecological compensation area, and other hotspots across the wider landscape providing maximum benefit for biodiversity.

Priority ponds

A medium-sized population of GCNs have been recorded in ponds 3, 4, 5 and 6 onsite. GCNs were also observed within two offsite ponds; ponds 24 and 26 both support a small-sized population of GCN. It is considered that the population of GCNs using the site likely forms part of a wider meta-population within the industrial estate and the surrounding landscape. GCNs are also listed as a species of principal importance under Section 7 of the Environment (Wales) Act 2016.

The proposed works will be completed under a European protected species (EPS) mitigation licence granted by Natural Resources Wales. As part of a licence, the proposed working area will be subject to a trapping and translocation scheme to ensure GCN are not directly impacted as part of the development.

Ponds 3, 5 and 6 are due to be retained as part of the proposed development (max. count of eight, thirteen and six individuals respectively). Pond 4 (max. count of six individuals) will be removed to facilitate the development. However, to compensate for the loss of this pond, as well as ponds 1 and 2 that are used by common amphibian species only, an additional 20 ponds of varying shape, size and depth will be created within the ecological compensation area. These ponds will be designed and managed to provide a range of ecological niches, from shallow ponds that dry out on occasion to deep ponds that retain water all year round. Through a mix of initial planting and natural colonisation, it is anticipated that the ponds will support a range of botanical communities, ensuring an abundance and diversity of egg laying opportunities and invertebrate prey on which GCNs and other amphibians can forage. Through compensatory pond creation on a 6:1 ratio, it is considered that the proposals will result in an overall increase in the availability and quality of breeding habitat for GCNs and other amphibians.

Whilst some areas of suitable GCN and amphibian terrestrial habitat will be lost in the form of semi-improved grassland, dense scrub, hedgerows and small sections of woodland in order to facilitate the development, large areas of suitable habitat within the southern section of the site will be retained and enhanced and the eastern section of the site is being subject to significant habitat creation and enhancement to create an ecological compensation area that will be managed in perpetuity with an emphasis on its suitability to support GCNs. Of the 25.4ha development boundary, approximately 11.4ha (45%) of the site will be retained or subject to habitat retention, enhancement and creation. This includes the creation or planting of wildflower grassland, marshy grassland, tussocky rough grassland, scrub, hedgerows, an orchard, marginal planting, ditches and ponds. Additionally, the area of open mosaic grassland and unimproved lowland meadow within the southern section of the site, and the linear features along the site boundaries, will be retained and enhanced. All the proposed habitat creation and enhancement will provide high-quality terrestrial habitat for GCNs and other amphibians.

The linear features at the site boundaries and a 10m buffer are to be retained as part of the site layout in order to provide ecological linkages for GCNs and other amphibian species to continue commuting between the site and offsite habitats within the wider landscape, maintaining ecosystem resilience. A mosaic of habitats is due to be retained, including all ditches, the watercourse, dense scrub, woodland, and a hedgerow, which will be enhanced with wildflower grassland, native in-fill scrub planting, and tree planting. The long-term management of these habitats will provide a variety of features suitable for commuting, foraging and sheltering GCN, as well as other species recorded on site, such as badgers and bats. A wildlife friendly external lighting scheme will be designed to avoid overspill onto the ecological corridors at the site boundaries, including the ecological compensation area.

As an additional ecological enhancement targeting GCNs, ten amphibian hibernacula will be created on site, six of which will be located within the ecological compensation area and the other four within the retained open mosaic habitat within the southern section of the site.

Given the proposed mitigation measures and significant levels of habitat retention, enhancement and creation, particularly relating to the retention of habitat corridors and pond creation, the residual impact on GCN is anticipated to be positive.

Trees

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.

In preapplication UES in consultation with NRW and the County Ecologist discussed the wider balance of development impact on habitats which included consideration of layout, developable and non-developable areas. As set out above, open mosaic habitat on previously developed land and lowland meadow priority habitat is present in the southern section has been retained to ensure that habitats of high biodiversity value are retained, which will continue to support biodiversity and functioning ecosystems, including species of principal importance.

The Arboricultural Impact Assessment, MD Landscape, confirms the proposals will lead to a loss of 36 individual trees, 26 groups of trees partially or fully removed and 5 hedgerows (644 m length). This is in context of 95 individual trees, one woodland compartment, 33 groups of trees and scrub, and 11 hedgerows surveyed.

The approach of avoid and minimise has been followed in balancing the need to create a serviceable and developable site area and allowing for the retention of existing habitats of high biodiversity value, which has led to the decision on the location and extent of trees lost. Mitigation is followed through the onsite planting proposals and ecological habitat priorities pursued to support species of principal importance. As set out in the proposed Planting Plans and Schedules a combined total of 207 native tree species will be planted in compensation onsite, together with 1,772m of mixed native hedge. Replacement ratio of hedgerow at 275% and trees at circa 300%.

Retained and replacement trees and hedgerows are also balanced to their landscape value with emphasis on minimising loss to, and enhancement of, site perimeters to maintain screen value and connectivity as green infrastructure.

Water resources

A Flood Consequence Assessment Report and a Drainage Strategy Report, has been prepared by Bradley Marshall, which accompanies the application. Technically the development will control surface water runoff to greenfield rates with allowance for climate change and storm events. Minimisation of the developed area and assessment of geohydrological features of the site has been applied to the Sustainable Drainage System (SuDS) hierarchy that parallels the step-wise approach advocated in green infrastructure. It identifies the viable options and recommendations which 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 development.

Design of the drainage options has been iterative with parallel considerations of retention of areas of high biodiversity and landscape value considerations of retention of trees and hedgerows in reaching an optimum and preferred design solution.

CONCLUSION

UES were instructed early in the design programme to identify the key ecological constraints on site and ensure that the highest quality habitats were retained as part of the scheme design. Pre-application discussion with NRW and the County Ecologist was taken at the earliest stage to inform design, layout and options in early adoption of the step-wise approach. This allowed significant habitat retention to be incorporated into the proposals with approximately 45% of the site being retained and enhanced for biodiversity, including three of the four GCN breeding ponds, lowland meadow and open mosaic habitats of principal importance. The impact on habitats and species of principal importance has been minimised, as far as is practicable; the small areas due to be lost are to be compensated for through a substantial ecological enhancement scheme onsite which goes over and above what is required to mitigate or compensate for any negative impact. In addition, the provision of a mosaic of connected habitats along the site boundaries will contribute to the green infrastructure network onsite promoting the natural distribution of species. Inter-related decisions on the retention, loss and compensation for trees and hedgerows and management of water resources and drainage dovetails with the approach to habitat enhancement, contributing to wider green infrastructure to the eastern edge of the Industrial Estate.

In summary, the proposed development provides a significant net benefit for biodiversity ensuring that ecological resilience is maintained within the wider landscape.

Yours faithfully,

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