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DATE: 30th January 2024

SITE: Kingmoor (Enabling Application), Wrexham Industrial Estate

REFERENCE: UES03448/41

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 planning application submitted to Wrexham Borough Council for ecology enabling works on a parcel of land at the Wrexham Industrial Estate, (LPA application reference P/2023/0640).

This letter has been prepared with support of planning consultant, Plan Red Ltd, drawing on the evidence prepared by MD Landscape and PGLA in support of the planning application and inter-related matters of landscape values of trees and hedgerows.

This is a pared back version of the letter reviewed and accepted by Emma Broad on the main planning application (LPA reference P/2023/0280) that was formally submitted on 24th January.

INTRODUCTION

The proposed development is for ecological enabling works, hereby referred to as the “Enabling Application” (reference P/2023/0640), on a parcel of land in connection with a proposed adjacent employment development known as ‘Kingmoor’, for which a separate planning application has been submitted (reference P/2023/0280), hereby referred to as the “Main Application” in this document.

The site for the Enabling Application is contained within a field to the east of the Main Application area, but also includes track access from the west and through the Main Application Site as there is no vehicular access to the proposed working area from the east. Most of the course of the access track is along an existing hardstanding track within the Main Application Site, including an existing bridge over a watercourse. Proposed works outside of the eastern field are limited to minor works required to create a stable surface in isolated areas to reach the eastern field.

The proposed enabling works are all contained within the eastern field and are for:

- 20no. new ponds to be created and retention of one existing pond (21no. total)
- 2no. new ditches to be created

This eastern field has an area of approximately 4.5ha and 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.

As part of a Preliminary Ecological Appraisal of both application sites (see report reference UES03448/01 V3), a walkover survey of the Enabling Application Site was undertaken on the 7th June 2022. This assessment, coupled with great crested newt (GCN) *Triturus cristatus* surveys of the onsite pond identified the presence of GCNs within both sites and within ponds in the surrounding landscape.

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.

1. Avoid
2. Minimise
3. Mitigate / restore
4. Compensate onsite
5. Compensate offsite
6. Refuse planning permission

Whilst linked to the adjacent Main Application, the Enabling Application has been submitted as a standalone application, to allow for its impacts and merits to be considered in isolation. The proposals detailed within this application solely relate to habitat creation with no other purpose. As such, potential adverse impacts on protected habitats and species are very limited, as are the requirements for compensation and mitigation. The proposed development will result in a significant ecological enhancement of the site, benefiting biodiversity in general, in addition to specific habitats and species of principal importance, specifically ponds and GCNs.

Habitats

The scheme has been designed to incorporate the creation of aquatic habitats, with the primary purpose of providing breeding opportunities for GCNs, in addition to providing general broader biodiversity gains and an enhancement in habitat quality for GCNs and a wide range of other ecological receptors including, other amphibians, botanical species, invertebrates, mammals and birds.

The layout and landscaping for the site has been designed by PGLA following significant input from UES. The proposals will involve the replacement of the existing homogenous swathes of agricultural grassland with a range of higher quality and varied habitats. This includes 20 new ponds, two new ditches. Following approval of the Main Application, additional areas of wildflower grassland, areas of coarse tussocky grassland, hedgerows, a small orchard, woodland and scrub planting will also occur.

All proposed planting has been designed to ensure only native species are planted and the scheme has been designed to avoid damaging and to retain all existing habitats of higher quality including the existing pond, hedgerows and trees.

Compensation for the loss of grassland habitats is not required as all areas of grassland lost will be replaced by habitats of greater ecological value, resulting in a significant ecological enhancement.

There will be no fragmentation of habitats or severance of commuting corridors as a result of the proposals. Which will result in the creation of a diverse site that is well linked to adjacent habitats that lie offsite and within the wider landscape.

GCNS

GCN presence / absence, population size class assessment and Environmental DNA (eDNA) surveys conducted by UES across March to June 2022, were undertaken of the single pond on site, of all ponds within the Main Application Site and of numerous offsite ponds in the surrounding area (see report reference UES03448/09). The single onsite pond within the Enabling Application Site was found to contain a max count of six GCNs.

Is it considered that the populations of GCNs using the site and the adjacent Main Application Site likely form part of a wider meta-population within the Wrexham Industrial Estate and the surrounding landscape. GCNs are listed as a species of principal importance under Section 7 of the Environment (Wales) Act 2016.

The proposals for this application solely relate to habitat creation, however there remains some, albeit limited potential to adversely impact individual GCNs during the works. These works will be localised to a small area of hedgerow removal (required to facilitate access) and excavation works for the creation of ponds and ditches. There will be no net loss of GCN habitat as a result of the proposals, which are solely being undertaken for the creation of GCN breeding habitat, which will be managed long term, with an emphasis on their suitability to support GCNs.

Due to the (limited) potential impacts on GCNs without mitigation, the proposed works will be completed under a European protected species (EPS) mitigation licence granted by Natural Resources Wales. A method statement has been prepared by UES and submitted with the application to detail how mitigation measures will be implemented to protect GCNs from harm during the development works (see report reference UES03448/31 V2)

The only pond present on site will be retained as part of the proposals and two ditches and 20 ponds of varying shape, size and depth will be created. These ponds have been designed and will be 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. A detailed pond specification has been included within the GCN method statement that has been submitted with the application. 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. The

proposals will result in a significant overall increase in the availability and quality of breeding habitat for GCNs and other amphibians.

The linear features at the site boundaries 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 other terrestrial habitats will be created on site as part of Main Application works. The long-term management of these habitats will provide a variety of features suitable for commuting, foraging and sheltering GCNs.

Given the proposed mitigation measures and proposed habitat creation, particularly relating to the retention of habitat corridors and pond creation, the residual impact on GCN is anticipated to be positive and there will be a significant enhancement in the availability and quality of foraging and breeding opportunities.

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.

No tree removal or arboricultural works are required to facilitate the proposed development and there will be no adverse impact on any trees or their root protection areas.

Water resources

The enabling works application does not raise matters of flood risk or drainage as is the case on the Main Application which will include built development on land to the west. As such, other than the value to the Main Application of this land as part of wider biodiversity value, which includes the formation of 20no. ponds as a water 'resource' and management, there is no other direct application of the drainage hierarchy engaged in this proposal.

CONCLUSION

UES were instructed early to identify the key ecological constraints on site and to inform design, layout and options in early adoption of the step-wise approach. This ensured that potential adverse impacts and the most appropriate mitigation measures were identified from the outset. Review of submitted documents, including proposed site layout and pond creation plans, and subsequent discussion has taken place between UES and the Ecologist at Wrexham Borough Council. This has allowed for changes to the proposals to prioritise additional pond creation and to maximise the potential ecological value of the development.

The impact on habitats and species of principal importance has been avoided where possible and minimised as far as is practicable; with the existing pond and all trees and hedgerows to be retained other than a small section of hedgerow removal required to facilitate access. The small areas of hedgerow and agricultural grassland that are to be lost will be compensated for through a substantial ecological enhancement of the site through the creation of 20 ponds and 2 ditches. The proposed habitat creation will result in the replacement of any habitat lost with a habitat of higher ecological value and goes over and above what is required to compensate for any negative impact, providing a significant ecological enhancement for both species and habitats of principal importance and biodiversity in general. In addition, the retention of all hedgerows, trees and habitat connectivity features on site, particularly at the boundaries, coupled with the creation of ecologically valuable habitats across the site will contribute to the green infrastructure network onsite promoting the natural distribution of species.

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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