
Technical Note

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Job name:	Ty Nos, Holt Road, Wrexham	Our ref	3201— RML Technical Note
Job no:	3201	Date of note:	17/03/2022

Note to: Emma Broad Wrexham County Borough Council

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Subject: Details of the provision of net biodiversity in order to discharge Condition 15.

1. INTRODUCTION

Background

Richards Moorhead & Laing Ltd (RML) were commissioned by Clwyd Alyn Housing Ltd to provide information in support of Condition 15 in respect of planning permission granted for the demolition of existing buildings and the erection of 19 apartments with ancillary office space (Planning reference WRA P/2021/0263). Condition 15 states:

Prior to commencement a plan to provide net biodiversity benefit on site should be submitted and approved.

The site is located off the A543, Holt Road, Wrexham (Grid Ref SJ 3410 5079). The site currently comprises of one main building, owned by ClwydAlyn and is currently unoccupied, and four containers/cabins. Ecology surveys and reports in support of the planning application were submitted which included a Preliminary Ecological Appraisal and Preliminary Roost Assessment¹. This included an Arboricultural Implications Assessment conducted by ROAVR Environmental². The report recommended biodiversity enhancement measures which included the provision of bat and bird boxes, hedgehog highways and the control and eradication of Japanese knotweed *Fallopia japonica* from site. This report was reviewed to inform this Technical Note.

The area consists predominantly of hardstanding, with small areas of landscape shrub planting and a few trees.

The site is located within a residential and commercial area of Wrexham. Asda superstore is located to the west with residential properties to the north, south and east.

¹ Hall, D (January 2021) Ty Nos Homeless Shelter Preliminary Ecological Appraisal and Preliminary Roost Assessment for Clwyd Alyn. Richards Moorehead & Laing Ltd 3154/11

² Appendix F, of the aforementioned report.

2. LEGISLATION AND PLANNING POLICY

In Wales, developments must demonstrate a net benefit for biodiversity, as outlined in section 6.4 of Planning Policy Wales (PPW) 11³. However, unlike in England, which utilise the DEFRA Metric 3⁴ to calculate Biodiversity Net Gain there is no metric to calculate, and as such, benefits to biodiversity should be based on the principles of Ecosystem Resilience set out in PPW11 and the Environment (Wales) Act, 2016⁵.

PPW11 (PPW para 6.4.5 refers) states that under the Biodiversity and Resilience of Ecosystems Duty (Section 6 Duty) “planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions” and that “development should not cause any significant loss of habitats or population of species, locally or nationally and must provide a net benefit for biodiversity”

The Environment (Wales) Act 2016 6 (1) states that “A public authority must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of these functions”.

3. OBJECTIVES

The objectives of this technical note are:

- to identify and improve the biodiversity of the site, taking into consideration the architectural design and constraints of the site.
- to advise upon appropriate and proportional net biodiversity measures on the site.

4. EXISTING AND PROPOSED CONDITIONS

Habitat

Table 1 below shows the existing land use alongside the proposed development of the land.

Table 1: Existing and proposed landuse

Area	Existing Site	Proposed Development	Difference (+/-)
Hard standing	1676m ²	1208m ²	-468m ²
Buildings	438m ²	710m ²	+272m ²
Trees	Ash <i>Fraxinus excelsior</i> (2) Sycamore <i>Acer pseudoplatanus</i> (7) Hawthorn <i>Crateagus monogyna</i> (1)	Crab apple <i>Malus sylvestris</i> (5) Bird cherry <i>Prunus padus</i> (2) Sargents cherry <i>Prunus sargentii</i> (1)	-2

³ Welsh Government (February 2021) Planning Policy Wales Edition11. [Planning Policy Wales - Edition 11 \(gov.wales\)](https://gov.wales/planning-policy-wales-edition-11)

⁴ [The Biodiversity Metric 3.0 - JP039 \(naturalengland.org.uk\)](https://naturalengland.org.uk/the-biodiversity-metric-3-0-jp039)

⁵ [Environment \(Wales\) Act 2016 \(legislation.gov.uk\)](https://legislation.gov.uk/ukpga/2016/5/section/6)

Area	Existing Site	Proposed Development	Difference (+/-)
Introduced shrub	52m ²	0	- 52m ²
Ornamental planting	0	167m ²	+ 167m ²
Native hedge	0	90m	+ 90m linear
Rain Garden	0	50m ²	+ 50m ²

As part of the development seven sycamore, one hawthorn and two ash trees are to be removed from the site. However, planting of eight species of trees (native and ornamental) and 90m of native hedging, the addition of the rain garden, ornamental shrub planting, inclusion of bat and bird boxes and the removal of non-native invasive species from the site, will increase the overall net biodiversity benefits of the site.

Plant species

Table 2 below shows the difference in the plant species which are currently on site, alongside the proposed planting species. Further details are provided on the planting plan Drawing Reference 3201/01, submitted in order to discharge Condition 15

Table 2 Species list pre and post development

Plant Species Before Development		Plant Species Post Development	
Japanese knotweed	<i>Fallopia japonica</i>	Sedge	<i>Carex pendula</i>
Bramble	<i>Rubus fruticosus</i>	Cormous	<i>Crocsmia</i>
Cherry laurel	<i>Prunus laurocerasus</i>	Iris sp	<i>Iris sibirica</i>
Sycamore	<i>Acer pseudoplatanus</i>	Silver grass	<i>Miscanthus sinensis</i>
Ash	<i>Fraxinus excelsior</i>	Heartleag foamflower	<i>Tiarella wherryi</i>
Hawthorn	<i>Crataegus monogyna</i>	Geranium sp	<i>Geranium macrorrhizum</i>
		Coral bells	<i>Heuchera</i>
		Honeysuckle	<i>Lonicera pileata</i>
		English lavender	<i>Lavandula angustifolia</i>
		Meadow bistort	<i>Polygonum bistorta</i>
		Geranium sp	<i>Geranium oxonianum</i>
		Dogwood sp	<i>Cornus alba</i>
		Mexican orange blossom	<i>Choisya ternata</i>
		Common periwinkle	<i>Vinca minor</i>
		Common ivy	<i>Hedera helix</i>
		Fern	<i>Dryopteris affinis</i>
		Spotted dead nettle	<i>Lamium maculatum</i>
		Beech	<i>Fagus sylvatica</i>
		Hornbeam	<i>Carpinus betulus</i>
		Holly	<i>Ilex aquifolium</i>
		Crab apple	<i>Malus sylvestris</i>
		Bird cherry	<i>Prunus padus</i>
		Sargents cherry	<i>Prunus sargentii</i>

It should be noted that during the survey conducted in January 2021, the invasive non-native species Japanese knotweed was present on site, as well as the problematic species cherry laurel and buddleia. It is noted that Condition 16 of the planning conditions refers to the submission of a treatment plan and method statement for dealing with the Japanese knotweed on site.

Table 3 below provides enhancement proposals in respect of protected species. These proposals are based on the architectural design and constraints of the site, including location, aspect and space. Proposals are provided on the planting plan, Drawing Reference 3201/01, Revision 3, attached to this document.

Table 3 Structures and features provided to wildlife

Species	Existing Site	Post Development	Recommended enhancements
Birds	The site provides some suitable foraging and nesting habitat for small passerines, generally within the shrub planting which occurs along the site boundaries.	Bird boxes would be installed on the new building. It is advised that one sparrow terrace of the type 1SP as shown (or similar) is positioned to the side (north) elevation of apartments 8 and 9, which face onto the proposed rain garden. It is also recommended that a bird feeder is installed within the area adjacent to the rain garden.	X 1 Schwegler 1SP Sparrow Terrace Nest Box (or similar).  Location of sparrow terrace on side elevation of apartments 8 and 9. The terrace should be installed at least two to four metres off the ground making sure that there is a clear flight path to the nest.
Bats	The structures on site contained negligible potential for bats owing to a lack of potential roost features and access into the	Bat boxes would be integrated into the new buildings and/or placed externally onto suitable gable ends, where these are faced with brick. This includes the rear (west) elevation of	

Species	Existing Site	Post Development	Recommended enhancements
	structures.	apartments 8 and 9, and the front (east) and rear (west) elevation of apartments 4 and 5. Area where it is proposed to be metal clad would not be suitable. These bat boxes are suitable for crevice dwelling bats.	Ibstock Bat box Type C (example of integrated bat box) Low Profile Woodstone Bat Box (example of externally mounted bat box.) X 1 integrated or externally mounted bat box to be installed under the gable.

Species	Existing Site	Post Development	Recommended enhancements
			 X 1 integrated or externally mounted bat box to be installed under the gable of rear and front elevations of apartments 4 and 5.
Invertebrates	No effects to invertebrates are envisaged. The site does not contain a varied structure of diverse flora to attract many species of invertebrates.	Any landscaping and planting will favour native or ornamental species which will attract insects. Consideration should be given to installing bug hotels, if feasible. Again, this could be positioned adjacent to the rain garden.	Bug hotels. 

CONCLUSION

This site has very little biodiversity at present, with the site consisting mainly of hard standing and buildings, which offer no roosting or nesting potential to bats and birds. Therefore, any development of the site has a great opportunity to increase the biodiversity and achieve a net gain in biodiversity.

The proposed development will include bat and bird boxes on or integrated within the new buildings, examples are provided, however the selection would be dependent upon availability. The soft landscaping will include native and ornamental species of trees and plants and with the eradication of the invasive/problematic species on site, this will all provide a net benefit to the biodiversity of the site.

Taking these conclusions into consideration, it is advised that the development would not cause any significant loss of habitats or population of species, locally or nationally and would provide a net benefit for biodiversity.



