



Butterfly Conservation Wales Gwarchod Glöynnod Byw Cymru

Saving butterflies, moths and our environment Yn achub glöynnod byw, gwyfynod a'n hamgylchedd ni

Gardd Fotaneg Genedlaethol Cymru (Stafell
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Llywydd Syr David Attenborough CH FRS

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Wrexham County Borough Council
Environment and Planning
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20th October 2021

Planning Reference Number: P/2021/0471

Land at Oak Road, Wrexham Industrial Estate, Wrexham, LL13 9RG outline application for erection of class b1 and b8 units including access and layout.

Butterfly Conservation objects to development plans for The Oaks site on the Wrexham Industrial Estate and would support removal of the site from the Local Development Plan. Butterfly Conservation is the national charity working to conserve butterflies, moths, and their habitats.

Butterfly Conservation objects to the above planning application for the following reasons:

- **The Oaks site is an important brownfield site and Local Wildlife Site.** The site currently supports a mosaic of different habitats in close proximity, of particular importance is Open Mosaic Habitat, a priority habitat in Wales, which is an important refuge for wildlife, in particular rare and scarce invertebrates. Whilst the development of scrub has considerably reduced the open grassland and bare ground habitat elements, the site continues to support habitat and rare species of importance in Wales including Grizzled Skipper (*Pyrgus malvae*) and Dingy Skipper (*Erynnis tages*) butterflies (Section 7 list, Environment (Wales) Act 2016). The conservation value of this site is recognised through its designation (non-statutory) as a Local Wildlife Site. These sites represent some of Wales' most valuable wildlife sites, form a core part of a vital network of threatened habitats and should be conserved and enhanced to help reverse the decline of Wales' declining animal and plant species.
- **Grizzled Skipper is recorded from The Oaks site.** The Wrexham Industrial Estate is a key landscape for the Grizzled Skipper in North Wales and is one of only six key areas left in Wales. The butterfly is currently recorded from six areas on the Estate, The Oaks site

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Registered Office Swyddfa Gofrestredig: Manor Yard, East Lulworth, Wareham, Dorset, BH20 5QP

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being one of these. Recent records for the Grizzled Skipper from The Oaks site (2019 and 2018) report around five individuals from the north-west part of the site. This indicates that The Oaks site is likely to support a small breeding population of the butterfly. The Grizzled Skipper uses sites that have poor soils, lots of bare ground and early successional vegetation including its main foodplants, Creeping Cinquefoil and Wild Strawberry. Whilst Butterfly Conservation acknowledges that scrub encroachment has resulted in a considerable reduction in suitable open habitat for the butterfly, Grizzled Skipper is currently only recorded in higher numbers from the ecological mitigation area of Her Majesty's Prison Berwyn. Numbers of the butterfly at the other sites on the Estate are all very low (largely due to the small size of these sites) indicating that The Oaks still supports an important population of the Grizzled Skipper on the Wrexham Industrial Estate.

- **Large, core sites of good quality habitat are vital to the success of sustaining functioning populations of wildlife on the Wrexham Industrial Estate.** Butterfly Conservation is involved with the Living Landscapes Scheme on the Estate and fully recognises the importance of development. However, it is vital that a strategic approach to development is taken; one that recognises key wildlife-rich sites that are irreplaceable and should not be developed, as well as areas where development can proceed with considerably less impact on the environment. The Oaks is as a key wildlife site on the industrial estate supporting important habitat and some of our rare species. Importantly, at 22.16 ha the site is one of only a few large, and therefore robust, areas of intact habitat remaining on the Estate. With appropriate management, this site has the potential to support a large population of the Grizzled Skipper. If The Oaks is developed this potential will be considerably reduced and could undermine the ability of the Estate to support thriving populations of the butterfly. The retention of large key sites for wildlife, such as The Oaks, is crucial if the robust ecological networks needed to support wildlife on the Estate, and in the wider landscape, are to be retained and enhanced. These large sites are more resilient, support larger populations of species and act as a source from which wildlife spreads out around the Estate. Smaller sites supporting smaller areas of habitat are important in terms of increasing available habitat resource and connectivity in the landscape but alone they cannot sustain biodiversity.
- **The Oaks site should be protected, enhanced and restored in its entirety.** Butterfly Conservation recognises that The Oaks site does need management to retain and enhance its valuable habitats and species; the key to these sites is re-starting the natural succession. What is missing from the industrial estate as a whole are early successional habitats and, with scrub removal undertaken as a priority, The Oaks could provide these important habitats in abundance. The presence of scrub is not key to determining soil fertility but the substrate and is therefore not a barrier to grassland creation. As the prison mitigation areas and work on other brownfields around Wales shows, it is easy to remove

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surface nutrient rich material to allow flower-rich grassland to develop. The potential loss of 5.5ha of restorable habitat to development, representing one-quarter of the valuable wildlife habitat present on the site, would constitute a significant loss in the context of the industrial estate. As the North Wales Wildlife stated in their objection, mechanisms for funding habitat maintenance, creation and enhancement on the Estate are currently being explored through the 'Living Landscapes Scheme as well as other initiatives being considered by WCBC. These funding mechanisms will mean that it is not necessary to sacrifice parts of the site to industrial development to fund its restoration.

- **Avoidance has not been considered.** Siting the development at a different site, where there would be less or no impact on biodiversity, has not been considered. As the North Wales Wildlife Trust state in their objection, plans for a North-East extension to the Estate are progressing, offering the potential to site developments where they will not result in such significant impacts on biodiversity. Development of part of this important Local Wildlife Site would not be in line with various policies and national priority frameworks including Wrexham County Borough Councils UDP Policy EC6, Sustainable Management of Natural Resources, The Environment (Wales) Act, Planning Policy Wales and the Well-being of Future Generations Act. These all clearly state the importance of halting and reversing biodiversity loss and improving the resilience of our ecosystems and ecological networks. At a time when the Welsh Government has declared both nature and climate emergencies, the need for a strategic plan for biodiversity on the WIE has never been greater so that we can move away from dealing with piecemeal planning applications on a reactive basis and towards the successful protection, restoration and enhancement of wildlife habitats at the landscape scale.

To summarise, Butterfly Conservation objects to this proposed development as it is within a Local Wildlife Site which supports nationally important and declining species and habitats. Butterfly Conservation believes that the only way to protect the wildlife of this important site, and to enable it to continue to be a key site in a functioning, resilient, ecological network for the Estate, is to protect and manage the site in its entirety. We therefore recommend outright refusal of this development proposal.

Yours Sincerely

Clare Williams

Senior Conservation Officer, Butterfly Conservation Wales.

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