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Consideration of the National Planning Policy for Chapter 6 of Planning Policy Wales – Distinctive and Natural Places – The Stepwise Approach

Introduction

1.1 This 'Green Infrastructure Statement' (GIS) has been prepared as an ecological technical note to support a retrospective planning application for a development on land at Net World Sports Headquarters, on the northeastern edge of Wrexham Industrial Estate Bryn Lane, Wrexham (hereafter referred to as the 'Site'). The proposals are for an industrial building for Plastic Extrusion.

1.2 The Welsh Government (WG) Minister for Climate Change Julie James wrote to the heads of the planning authorities in Wales on 11th October 2023 informing them of a finalised policy for Chapter 6 'Distinctive and Natural Places', to be included in the next iteration of Planning Policy Wales Edition 12 (PPW 12). PPW 12 was subsequently issued on 4th February 2024.

1.3 PPW 12 sets out the land use planning policies of the WG and the primary objective of PPW 12 is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015[1], the Well-being of Future Generations (Wales) Act 2015[2] and other key legislation and resultant duties such as the Socio-economic Duty[3].

1.4 This 'GIS' demonstrates how green infrastructure has been incorporated into the proposals.

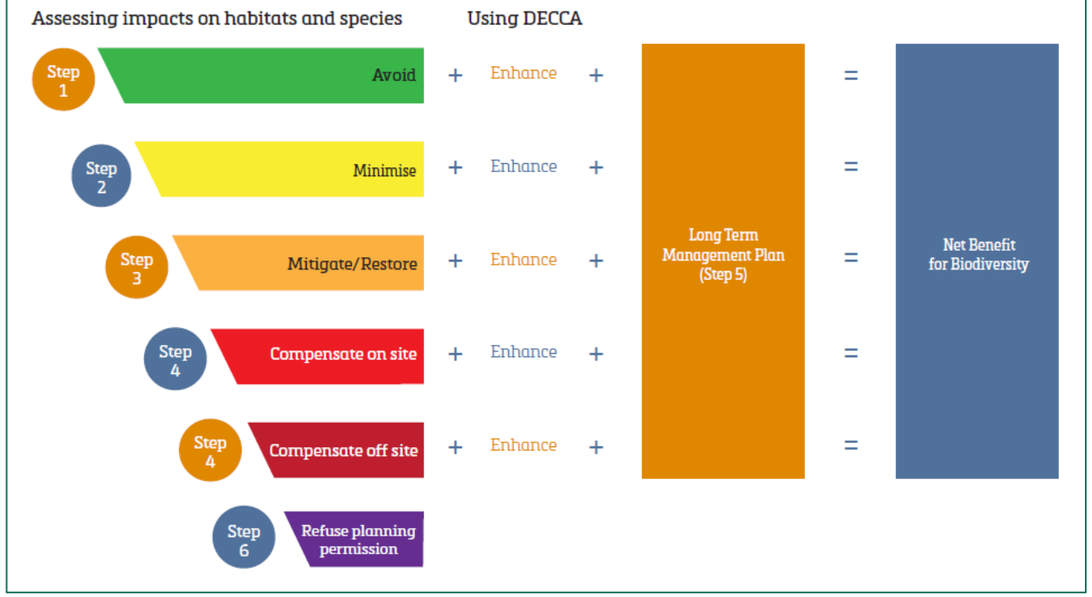
Net Benefit for Biodiversity and the Step-wise Approach

1.5 PPW 12 (Paragraph 6.4.11) advises that planning authorities must follow a step-wise approach 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 minimized, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.

1.6 PPW 12 expands on the approach to decision-making with regard to development and nature conservation previously set out in Technical Advice Note 5 (TAN5): Nature Conservation and Planning (2009)[4]. TAN5 detailed a five-point approach to decision-making including; information, avoidance, mitigation, compensation and new benefits.

1.7 The step-wise approach updated within PPW 12 is summarised in the graphic below extracted from Figure 12 of PPW 12.

Figure 12: Summary of the Step-Wise Approach



1.8 The step-wise approach is a means to demonstrate that actions have been taken to provide a net benefit for biodiversity and to promote ecosystem resilience through following attributes included within the 'DECCA Framework'. Attributes identified within the 'DECCA Framework' include:

- **Diversity** - between and within ecosystems;
- **Extent** - scale of ecosystems;
- **Condition** - state of ecosystems including their structure and functioning;
- **Connections** - between and within ecosystems; and
- **Adaptability** - ecosystems ability to adapt to, resist and recover from a range of pressures.

[1] Planning (Wales) Act 2015 (anaw 4) (July 2015) (PWA 2015). National Assembly for Wales [Online] - https://www.legislation.gov.uk/anaw/2015/4/contents

[2] Well-being of Future Generations (Wales) Act 2015 (June 2015). Welsh Government [Online] - https://www.gov.wales/well-being-future-generations-act-essentials-html

[3] The Socio-economic Duty (May 2020). Welsh Government [Online] - https://www.gov.wales/socio-economic-duty-overview

[4] Technical Advice Note 5 (TAN5): Nature Conservation and Planning (September 2009). National Assembly for Wales [Online] - https://www.gov.wales/sites/default/files/publications/2018-09/tan5-nature-conservation.pdf

Understanding the Wider Ecological Context

1.9 The State of Natural Resources Report (SoNaRR)[5] and the Natural Resources Wales (NRW) Area Statement for North-East Wales[6] provide contextual information about the pressures on nature in the area within and surrounding the site and the priorities for improving the resilience of local ecosystems.

1.10 The NRW Area Statement for North-East Wales comprises five themes:

- Climate emergency: resilience and adaptation
- Develop and improve urban and rural green infrastructure;
- Increasing woodland cover for social, environmental and economic benefits;
- Promoting the resilience of ecosystems in maintaining and enhancing biodiversity;
- Protecting water and soil through farming and sustainable land management.

1.11 The proposed development has the potential to deliver on some of these themes and thereby assist in the delivery of Sustainable Management of Natural Resources (SMNR) in Wales.

Pre-application surveys – the "information" stage of the step-wise approach.

1.12 The site has previously been subject to previous ecological surveys under planning permission APP/H6955/A/12/2188910 and been subject to a great crested newt trapping and mitigation scheme in 2020 under Natural Resources Wales license reference SD88525/2, which is currently active. Fencing and mitigation measures remain intact to the present day.

1.13 The site area prior to the construction of the Industrial Shed comprised primarily of hardstanding and an area of intensive arable land measuring 12mx40m outside of the mitigation area. Ecological surveys of the site were originally undertaken in June 2024 by TEP[7] to understand the biodiversity of the site. The results of the surveys informed the:

- Mitigation and enhancement plans for protected and priority species and habitats found on or adjoining the site.

1.14 In brief, the following ecological features were recorded on the site (prior to construction):

- Hardstanding and a small area of arable land;
- No notable (WCA8) or non-native invasive flora (WCA9) were identified within the site;
- Any Great Crested Newts within the site were captured and translocated to a mitigation site, which includes two mitigation ponds in August 2022 as part of planning requirements for a previous development and continue to be monitored under licence (NRW license number SD88525). Vertical amphibian exclusion fencing was installed around the perimeter, internal hedgerows and wet ditches of the site, and they remain in position to prevent GCN from re-entering the site boundary, the area provides limited foraging opportunities;
- The habitats on-site provide limited habitat for foraging and commuting badger but no field signs were recorded during the survey;
- No bat roosting habitats were present in the site, with limited foraging habitat given the disturbance of neighbouring HQ warehouse; and
- As the site area had been previously cleared, and vertical amphibian exclusion fencing installed the presence of reptile species in the Scheme is considered unlikely.

1.15 The site is located on the northeast edge of Wrexham Industrial Estate. The site has limited connectivity with habitats to the north, east and west but there is some, albeit limited, connectivity with habitats to the south.

Habitats and Flora

Designated Sites and Priority Habitats

1.16 There are no statutory sites within 3km of the Site. Only a minor increase (no. 10) in the number of employees on the Site is anticipated which is unlikely to have an impact on phosphorus load from the receiving wastewater treatment works into the River Dee and Bala Lake Special Area of Conservation. Therefore direct impacts on statutory designated sites are not anticipated.

1.17 There is one non-statutory local wildlife sites identified within 1km:

- Wrexham Industrial Estate Local Wildlife Site (LWS) - 0.6km south - A series of sites including unmanaged species rich grassland at Bryn Road and Cefn Park and ancient broadleaved woodland, Erlas Black Wood.

1.18 Given the distance from the Site and intervening roads no impacts are anticipated on the LWS.

1.19 The proposed development has no effect on ancient woodland or veteran trees.

On-site Baseline

1.20 The Site predominantly comprises areas of hardstanding and a small area of arable land. The Site is however situated within the area managed under a Landscape and Ecological Management Plan.

Fauna

On-site Baseline

1.21 Given the location of the Site and previously GCN trapping and installation of exclusion fencing the Site its of limited value to fauna.

[5] State of Natural Resources Report (SoNaRR) for Wales (December 2020). Natural Resources Wales [Online] - https://naturalresources.wales/sonarr2020?lang=en

[6] Natural Resources Wales (2024). North East Wales Area Statement. [Online] Available at: *https://naturalresources.wales/about-us/what-we-do/strategies-plans-and-policies/area-statements/north-east-wales-area-statement/?lang=en#:~:text=North%20East%20Wales%20encompasses%20the,arteries%20and%20some%20stunning%20scenery.* [13/03/25].

[7] TEP (2025). 11023.002 Industrial Shed at Bryn Lane, Wrexham - Ecological Impact Assessment v2.

Avoidance and Minimising Measures

Habitats and Flora

1.22 The Site had limited ecological value immediately prior to construction and therefore no direct impacts have occurred as a result of the development.

Fauna

1.23 Habitat creation and mitigation has been incorporated into the wider landscape strategy of the wider development off site. The provision of habitats of suitable compensation relating to the development of the wider area is ongoing and included within a Landscape and Ecological Management Plan.

1.24 No lighting is to be installed on the elevation facing the adjacent woodland. Low level directional lighting should be used if required.

1.25 Works were completed outside of the nesting period (typically taken to be March to August inclusive).

Mitigation and Compensation Measures

Habitats and Fauna

Although the areas of habitat lost are of limited ecological value the Site is situated within the area managed under a Landscape and Ecological Management Plan.

Enhancement – the “Net Benefit” stage of the step-wise approach

To provide a net benefit for biodiversity, the following enhancement measures will be provided:

- Two bat boxes will be installed within the Site to provide roosting habitat;
- Two house sparrow terraces will be provided for birds of conservation concern; and
- One hedgehog box to be installed within established habitat along the southern boundary.

Ecosystem Resilience and the DECCA Framework

1.26 The proposals have sought to provide an ecosystem function, considering the design, siting and scale density to maintain biodiversity and ecosystem resilience. The resilience of ecosystems supported by the site have been considered through the DECCA Framework:

- **Diversity** – a variety of boxes will be installed to provide habitat for a variety of species, acting to support biodiversity within the site locality.
- **Extent** – no habitats of ecological value are being lost.
- **Condition** – the condition of suitable roosting, nesting and sheltering habitat will be enhanced;
- **Connectivity** - connectivity for fauna will be maintained and enhanced through the provision of a range of boxes; and
- **Adaptation** – Provision of bat and bird boxes in different locations around the proposed development will also allow bat and bird species to adapt roosting and nesting locations dependent on season and life cycle.

Green Infrastructure

1.27 PPW 12 (Paragraph 6.0.3) notes that Distinctive and Natural Places must maintain or incorporate Green Infrastructure (GI) as key components of the natural environment and built fabric.

1.28 PPW 12 (Paragraph 6.2.1) notes the components of GI that may be present at local or smaller scales (the scales of GI applicable to development proposals, rather than landscape-scale GI).

Limited green infrastructure was present prior to the construction. The Site is included in the area subject to an existing Landscape and Ecological Management Plan for wider Net World Sport HQ.