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23rd January 2020

Our Ref: C365-CoxFreeman-Letter-230120-TK

Dear Alan

**Re – Proposed Grassland Management Regime at Rowan Foods Ltd, Ash Road South,
Wrexham Industrial Estate**

Introduction

Marches Ecology was commissioned by Cox Freeman Ltd to review management of the strip of grassland located between the existing building and the northwest boundary at the Rowan Foods Ltd site, Ash Road South, Wrexham Industrial Estate (approximate OS Grid Ref. SJ 377 502). A similar exercise was completed in 2013 and 2018 to provide supporting information for different planning applications (Planning Refs. P/2012/0879 and P/2018/0296 respectively). The aims of this review are largely as follows:

- to briefly characterise the existing grassland resource and consider whether the grassland management regime prescribed in 2018 should be continued or not. The management regime should be beneficial for wildlife.
- to identify areas to which any new management should be applied on a plan and provide details of the new management regime.

The requirement for this 'biodiversity statement' was discussed and agreed with Emma Broad (Ecology & Biodiversity Officer, Wrexham County Borough Council). The 2018 'biodiversity statement'¹ incorporated a plan of the site showing the proposed grassland management regime in each area. This plan will be updated as necessary. This letter and the associated plan are therefore provided in support of a planning application. It does not form part of any required ecological mitigation or compensation measures due to the proposed development but is rather offered as (biodiversity) enhancement.

The proposed development briefly concerns an extension to the existing Rowan Foods Ltd premises, associated car parking and a new road exit point for HGVs onto Ash Road South. Further information

¹ Marches Ecology Ref. C365-CoxFreeman-Letter-040418-TK dated 04/04/18.

is provided in the Design and Access Statement² submitted as part of the planning application. The proposed extension is presented on a Cox Freeman Ltd plan entitled 'Proposed Site Plan' Dwg. no. ROW01-CFL-00-00-AP-A-0501 rev. P02, dated 16 January 2020.

Site Survey

A brief walkover survey of the land to the north, west and southwest of the existing Rowan Foods Ltd building was conducted on 21st January 2020 by Tom Knight of Marches Ecology. The weather was 100% grey cloud with a light breeze. The site visit focussed on land within the proposed development footprint and immediately adjacent land where access was provided.

Existing Resource

Following the construction of the extension in 2018/ 2019 there is very little remaining grassland to the west-northwest and southwest of the existing building. Most of this area is now characterised by car parking laid to unconsolidated small diameter limestone hardcore. The west-northwest edge of the car park is bordered by a low earth bund. The strip of grassland on the bund is approximately 1-2 m wide and the sward attains a height of approximately 1 m. It is dominated by *Holcus lanatus* (Yorkshire-fog) with frequent *Dactylis glomerata* (Cock's-foot), occasional *Elytrigia repens* (Common Couch), *Deschampsia cespitosa* (Tufted Hair-grass) and *Centaurea nigra* (Common Knapweed). To the immediate northwest of this grassland there is a young planted hedge along the site boundary.



The low earth bund with currently unmanaged grassland on the edge of the car park.

Between the car park and the hard-standing adjacent to the existing building there is an approximate 30° slope to 2.5 m high. This slope supports disturbed, infrequently managed grassland. At the time of the survey the vegetation had a height of approximately 0.1-0.2 m. It contains abundant *Agrostis stolonifera* (Creeping Bent), frequent *Ranunculus repens* (Creeping Buttercup), occasional *Ranunculus acris* (Meadow Buttercup), Cock's-foot, *Leucanthemum vulgare* (Oxeye Daisy), *Poa compressa* (Flattened Meadow-grass) and a range of other grasses and forbs. This slope would be impacted by the proposed extension.

² Cox Freeman Ltd (2020). *Design and Access Statement – Proposed Cold Store Extension Including 1 no. Additional Dock and First Floor Office Space, New Site Exit Access Junction onto Ash Road South for HGVs, Additional 37 no. Car Parking Spaces to the West Elevation and External Infill Extension to the North Elevation, Rowan Foods, Wrexham.* Ref. ROW01-CFL-ZZ-XX-RP-A-0720.



The slope of disturbed vegetation by the building.

To the north and north-northeast of the existing car park there is a small area of currently unmanaged grassland. This grassland is also located adjacent to an area of scrub and further unmanaged grassland in the northern corner of the wider Rowan Foods site. The proposed extension would impact part of this grassland. It contains frequent Yorkshire-fog, *Rumex obtusifolius* (Broad-leaved Dock), locally frequent Cock's-foot, *Helminthotheca echioides* (Bristly Oxtongue), occasional Common Couch, Common Knapweed, *Heracleum sphondylium* (Hogweed) and *Rubus fruticosus* agg. (Bramble) with a small amount of *Cynosurus cristatus* (Crested Dog's-tail). The sward height is to approximately 1 m high.



The currently unmanaged grassland to the north of the existing car park.

Elsewhere on the west/ northwest side of the existing building grassland is generally represented by small fragments around the edges of the car park. The composition of this grassland varies greatly. At the present time most of these areas appear to largely be regularly managed as short grassland being cut as and when required during the growing season. This has resulted in most of the sward being approximately 0.05 to 0.1 m high.

To the south/ southwest of the existing building there are some small fragments of moderately species-rich grassland around the edges of areas of hard-standing. While it is managed as short amenity grassland it remains moderately species-rich. It is often dominated by Red Fescue and Yorkshire-fog with Perennial Rye-grass, Common Bent, Oxeye Daisy, Selfheal, Creeping Buttercup, *Ranunculus bulbosa* (Bulbous Buttercup) and lesser amounts of Common Knapweed, Common Sedge, *Potentilla reptans* (Creeping Cinquefoil) and *Primula veris* (Cowslip). The sward was approximately 0.1-0.2 m high at the time of the survey. Towards the southwest corner of the site a small number of basal rosettes of *Ophrys apifera* (Bee Orchid) were recorded. Bee Orchids remain more frequent around the brick office building close to the Ash Road South frontage.



**A low slope of moderately species-rich grassland by the car park,
apparently regularly mown.**

To the north and north-northeast of the existing building there are some disturbed patches of less frequently managed grassland which is moderately species-rich. It is dominated by Red Fescue with Yorkshire-fog and Cock's-foot. Other plants present include locally frequent Common Knapweed, Cowslip, occasional to locally frequent Bramble), occasional Lesser Celandine, Meadow Buttercup, *Chaerophyllum temulum* (Rough Chervil) and Oxeye Daisy. The sward height is to approximately 1 m high.



Patches of disturbed moderately species-rich grassland to the north/ north-northeast of the existing building.

Proposed Management Regime

The following management regime for the whole Rowan Foods Ltd site was proposed in 2013:

'It is suggested that the strip along the eastern boundary is left unmanaged to strengthen the potential wildlife corridor along the stream while the grassland on the western side of the site is managed to promote floristic richness and other wildlife. The width of the unmanaged grassland along the eastern boundary would be extended in places while maintaining well managed edges around areas of hard-standing, buildings, etc. The area of grassland to be included in the new management regime on the western side of the site would be located so as to incorporate a sufficient stand-off from the food production buildings along with well managed edges around hard-standing, etc. Short grassland is required in close proximity to the food production buildings so as to deter vermin. The area of grassland around the office building (from which the Orchids were noted) is also included in the new management regime.

The attached plan presents the approximate areas of the site to which the proposed management regimes will be applied. It should be noted that in all areas there will be some requirement for more intensive management, e.g. strimming around boreholes, etc.

The areas and applicable management are as follows (refer to attached plan):

- *Amenity grassland (shown as yellow on the plan). These areas will be intensively managed so that the sward remains at approximately 0.05 m to 0.1 m in height. The existing management regime will be applied. The amenity grassland is largely located at the site entrance, near buildings and around the edges of hard-standing.*
- *Unmanaged grassland (shown as orange on the plan). The grassland in this area will not be subject to any management. The unmanaged grassland is located in a strip along the eastern side of the site. Any requirement to control scrub in this area would be reviewed in the future.*
- *Species-rich neutral grassland (shown as red on the plan). The species-rich neutral grassland will be managed for the benefit of floristic richness through active management. It is largely located along the western edge of the site. This management regime essentially proposes a reduction in*

the number of cuts undertaken along with a change in the timing of those cuts. It also requires that all cut material should be removed, ideally a day or two after cutting (to allow seed to drop). The cuttings could be left in a pile on site, perhaps near the scrub in the northern corner if this does not pose any problems with operation of the site.

This grassland should be cut once a year in late August/ September. A second cut could be undertaken in September/ October if required to produce an appropriate sward height. This second cut could alternatively be undertaken in early spring, but this must be before nesting birds may be present (e.g. February).

- Woodland/ scrub (shown as green on the plan). This area is shown for information only and will not be subject to management.

To minimise impacts on wildlife that might inhabit the grassland areas the cutting blades on mowing equipment should be set no lower than 10 cm above ground level. This should also be applied when using a strimmer’.

Whilst there is little grassland remaining on the west/ northwest side of the existing building and this would be further reduced by the current proposed extension, this management regime remains broadly appropriate and should be continued. The attached plan has been amended to take into account physical changes to the site since the review completed in 2018 as well as the current proposed extension.

As a possible enhancement measure consideration should be given to the planting of plug-plants in areas to be managed as ‘species-rich neutral grassland’. Planting should be undertaken in areas that are unlikely to be the subject of any future development. Species to be planted should include Common Bird’s-foot-trefoil, *Agrimonia eupatoria* (Agrimony) and *Fragaria vesca* (Wild Strawberry). The plants should be of certified UK origin. Potential suppliers include PlantWild³, British Flora⁴ or Landlife⁵. The three species listed are larval food-plants of the Dingy (*Erynnis tages*) and Grizzled Skipper (*Pyrgus malvae*) butterflies. These uncommon butterflies are known to be present on various parts of Wrexham Industrial Estate and it is hoped that the proposed plug-planting would enhance the habitat within the Rowan Foods Ltd site for them.

Wildflower Seed Mix

The proposed development would include the creation of an embankment adjacent to the west-northwest boundary. Along with some areas of land around the new exit road these areas are currently laid to hardcore but it is assumed that soil would be used on the embankment and the verges of the access road. It is therefore suggested that these new areas of soil are sown with a wildflower seed mix. An appropriate seed mix would be Emorsgate Seeds’ ‘EM4 – Meadow Mixture for Clay Soils’⁶.

Once established these areas could be added to the ‘species-rich neutral grassland’ resource on the site and managed in accordance with the prescriptions above.

³ <https://plantwild.co.uk/wild-plants/>

⁴ <https://www.britishflora.co.uk/wild-flowers/>

⁵ <https://www.wildflower.co.uk/wildflower-plugs-and-plants.html>

⁶ <https://wildseed.co.uk/mixtures/view/5>

Locally Scarce Plants

During the walkover survey two species of Locally Scarce⁷ plant in Denbighshire (Williams 2014⁸) were recorded: Flattened Meadow-grass and Bee Orchid. The proposed extension is unlikely to affect the known locations of Bee Orchid. The slope from which Flattened Meadow-grass was recorded would be entirely lost due to the proposed extension. Whilst it is possible that this grass may be present in other parts of the site an attempt will be made to relocate part of the existing resource.

At the same time as implementing the Great Crested Newt Reasonable Avoidance Measures the ecologist will supervise the relocation of some of the Flattened Meadow-grass plants to an area outside the development site. This will be achieved by excavating the soil to a reasonable depth using a tracked excavator with a toothed digging bucket. This soil and vegetation will then be re-laid as best as possible elsewhere within the site.

Commitment

Rowan Foods Ltd is committed to continuing the proposed grassland management regime as detailed in this letter and attached plan in order to enhance the wildlife value of their site. However, Rowan Foods Ltd reserve the right to review the success or otherwise of the proposed management in terms of the primary purpose/ business of the site (e.g. food production). Should the grassland management result in any detrimental impacts on this primary purpose then the management regime would be amended to address such issues.

Should you require any further information with regards the above proposed grassland management regime please do not hesitate to contact me.

Yours sincerely



Tom Knight
Partner

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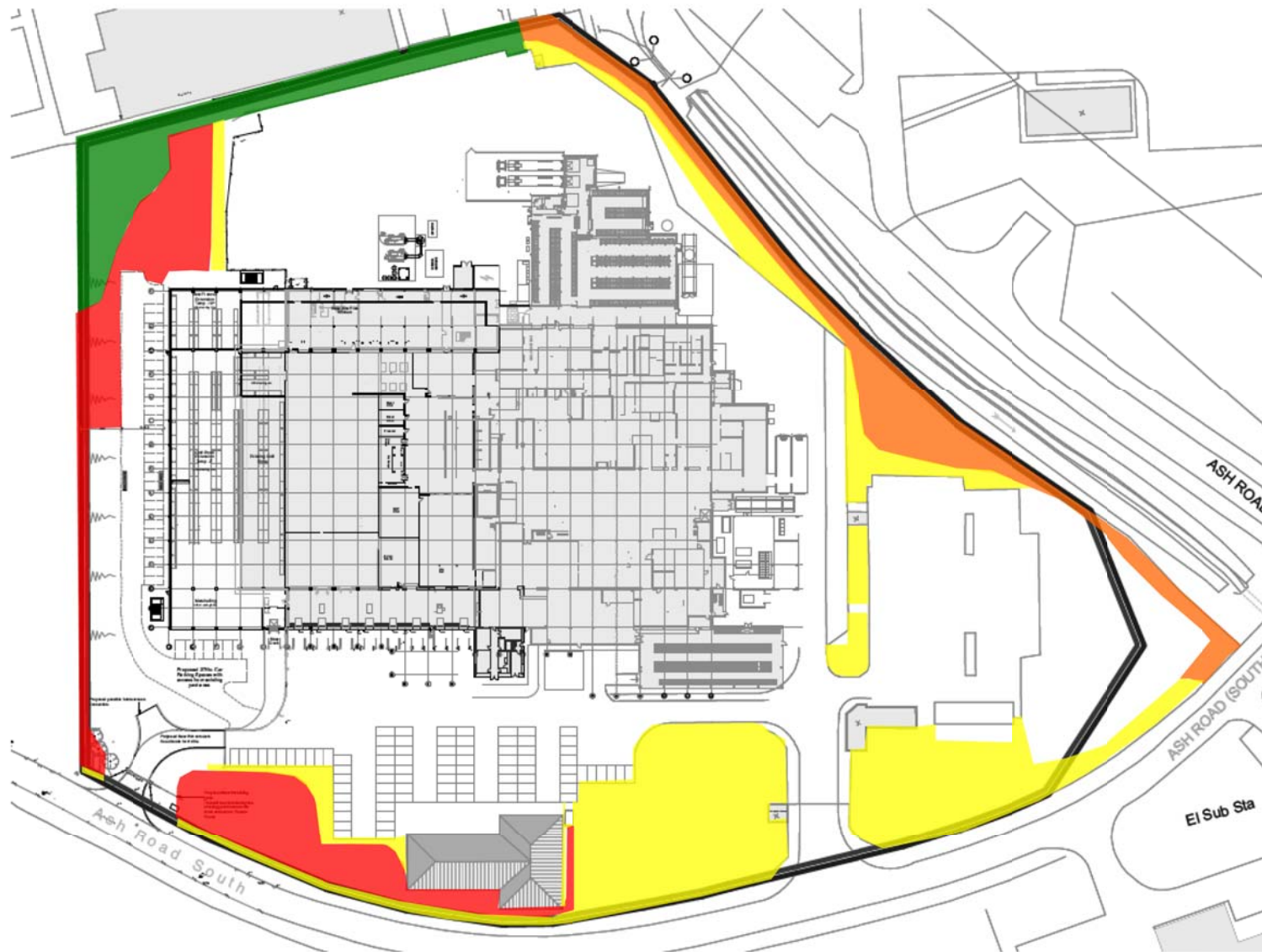
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⁷ Locally Scarce – found in 4-15 Wells sites in Denbighshire (Williams 2014).

⁸ Williams, D. (2014). *Denbighshire (VC50) Rare Plant Register*. BSBI & NRW.



Base mapping from a Cox Freeman Ltd plan entitled 'Rowan Foods – Proposed Site Plan' (Drawing No. ROW01-CFL-00-00-AP-A_0501, Rev P02, dated 16/01/2020).

marches ecology

C365 Proposed Grassland Management Regime at Rowan Foods Ltd, Ash Road South, Wrexham Industrial Estate

Drawn by: ME
Checked by: TK
Date: 23.01.20

Key

- Amenity grassland
- Unmanaged grassland
- Species-rich neutral grassland
- Woodland/ scrub (unmanaged)