Title	**Proposed Demolition of Former Police Station, 4 Cae Gwilym Lane, Cefn Mawr, Wrexham, LL14 3LT, and Construction of Block of Flats – Biodiversity Statement**
Date issued	**23rd July 2025**
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Reviewed by	**Max Ellson**
Client	**Wrexham County Borough Council**
Report Version	**C566/ Biodiversity_Statement/ 1.0**

1 Introduction

Background

1.1 It is proposed to demolish the Former Police Station, Cae Gwilym Lane, Cefn Mawr, Wrexham (Approximate OS Grid Ref. SJ 2774 4203) and construct a small block of flats/ apartments on the site. This Biodiversity Statement is provided as supporting information to the planning application for the demolition and construction of the new flats.

1.2 The ecology survey and reporting requirements have been discussed with Wrexham County Borough Council's (WCBC) Ecology and Biodiversity Officer. It was agreed that a bat Preliminary Roost Assessment (PRA)/ nesting bird assessment, a Biodiversity Statement and a Green Infrastructure Statement (GIS)[1] should be submitted with the application. The PRA is provided as a separate standalone report. The PRA should be consulted for details of proposed bat and nesting bird mitigation/ compensation measures. This Biodiversity Statement largely considers enhancement measures only. The GIS is also provided as a separate standalone report.

1.3 This Biodiversity Statement includes the following:

1. A brief description and assessment of the existing habitat immediately around the building and within the survey site.
2. Identification of locations and opportunities for potential ecological enhancements.
3. Consideration of the potential for off-site provision particularly on open space off Trem Dolydd.
4. Demonstration of how net benefit for biodiversity (and ecosystem resilience) will be secured and maintained. Full details of the recommended ecological enhancements.
5. Reasonable Avoidance Measures with regards nesting birds and Hedgehogs.

1.4 This document has been produced by Marches Ecology to provide the above information.

Site Description

1.5 A site visit was undertaken on 18th February 2025 by Tom Knight of Marches Ecology. The weather during the visit was sunny with 80% white cloud cover and a light breeze. One of the purposes of the visit was to broadly characterise the existing ecological resource and vegetation/ habitat within the survey site. An Extended Phase 1 Habitat Survey or other

[1] Marches Ecology (2025a). *Proposed Demolition of Former Police Station, 4 Cae Gwilym Lane, Cefn Mawr, Wrexham, LL14 3LT, and Construction of Block of Flats – Green Infrastructure Statement*. Produced on behalf of WCBC.

similar ecological survey has not been undertaken. The brief description provided here is based entirely on information collected during the site visit.

1.6 The boundary of the survey site is indicated on *Figure 1*. Target Note locations (numbered 1 to 9) described in the text below are indicated on *Figure 1*; no separate target note descriptions are provided.

1.7 The survey site is located at the corner of Cae Gwilym Lane and Trem Dolydd in Cefn Mawr. It is a semi-urban location towards the western edge of the village. It is largely surrounded by a range of residential properties, along with roads including Cae Gwilym Lane to the west and Trem Dolydd to the north. There is a small parcel of land to the immediate south characterised by dense shrubs and trees. To the southeast of this there is a small area of open space largely characterised by amenity grassland.

1.8 The main building of the former police station (*Target Note 8*) is similar to a typical residential property with two storeys, pitched slate roof and painted-brick external walls. There are single-storey flat-roofed sections on the northern and southeast sides. The flat roofs are covered in bitumen felt. The soffit boxes all appear to be fairly new and well-sealed. The building is bounded by concrete foot-ways on all sides.

1.9 There is a detached double-garage (*Target Note 9*) located to the southeast of the main building. It has a tiled pitched roof with rendered walls. There are two single garage doors. The soffit boxes all appear to be fairly new and well-sealed.

1.10 The survey site boundaries are formed by timber panel fences. The fence on the western boundary (*Target Note 1*) is approximately 1 m high. There is an adjacent shrub border to approximately 1.5 m wide. It contains various ornamental shrubs such as *Cornus* sp. (Dogwood), *Euonymus japonicus* (Evergreen Spindle), *Prunus laurocerasus* (Cherry-laurel), *Choisya ternata* (Mexican Orange Blossom), *etc*. The ground beneath is largely bare with a few low-growing ruderals.

1.11 There is a similar shrub border adjacent to the western half of the northern boundary (*Target Note 2*). The ornamental shrubs also include *Berberis* sp. (Barberry) and *Viburnum davidii*. There is a large old tree stump present. The boundary along the western half is formed by a low fence as at *Target Note 1*. The timber fence along the eastern half is approximately 2 m high and supports various *Hedera* sp. (Ivy) cultivars in places.

1.12 The eastern boundary is formed by a timber fence to approximately 2 m high (*Target Note 3*). The southern boundary is formed by a similar fence (*Target Note 4*) which supports a small amount of *Hedera helix* agg. (Ivy).

1.13 In front of the building, to the west, there is a car park which is largely laid to tarmac or block paviours (*Target Note 5*). There are scattered low-growing ruderals, grasses and a few *Buddleja davidii* (Butterfly-bush) seedlings. This hard-standing extends to the south of the main building and to the west of the double-garage.

1.14 To the north of the main building there is a small triangle of amenity grassland that is currently unmanaged (*Target Note 6*). The sward is generally between 0.2 m and 0.6 m high. It is species-poor and is dominated by *Agrostis capillaris* (Common Bent) with locally abundant *Agrostis stolonifera* (Creeping Bent), locally frequent *Arrhenatherum elatius* (False Oat-grass), *Ranunculus repens* (Creeping Buttercup), occasional *Festuca rubra* (Red Fescue), *Taraxacum officinale* (Dandelion), *Senecio jacobaea* (Common Ragwort), *Dactylis glomerata* (Cock's-foot) and lesser amounts of *Prunella vulgaris* (Selfheal) and *Ranunculus acris* (Meadow Buttercup).

1.15 To the east/ northeast of the main building there is a further small rectangle of amenity grassland that is currently unmanaged (*Target Note 7*). The sward is similar to that at *Target Note 6* although it is a little more tussocky as there is more False Oat-grass and Cock's-foot. *Primula vulgaris* (Primrose) is locally abundant towards the northern boundary.



Shrub borders at *Target Notes1* and *2* (left and right respectively).



The southern boundary fence (*Target Note 4*).



The main building (*Target Note 8*) and parking area at *Target Note 5*.



The garage (*Target Note 9*).



The grassland at *Target Note 6*.



The grassland at *Target Note 7*.

Green Space at Corner of Cae Gwilym Lane and Trem Dolydd

1.16 There is a small area of green space at the corner of Cae Gwilym Lane and Trem Dolydd, directly adjacent to the northern site boundary. It is largely characterised by regularly cut amenity grassland. At the time of the survey visit it appeared that the grass had been cut recently and the sward was less than 0.05 m high. There is also two semi-mature *Sorbus aria* agg. (Common Whitebeam) trees.



The green open space immediately north of the survey site (above and below).





The Proposal

1.17 It is proposed to demolish the existing former police station and associated garage.

1.18 The proposed development concerns the construction of a single unit comprising four flats/ apartments. The proposed development is presented on two TACP Architects Ltd plans as follows:

- 'Proposed Site Plan – Option 4', dwg. no. CMH-TACP-XX-XX-DR-A-7104 Re. P02, dated 16/04/25.
- 'Proposed GA Elevations', dwg. no. CMH-TACP-XX-XX-DR-A-2000 Re. P01, dated 15/04/25.

In addition to the new housing unit these plans show an area of hard-standing including six car parking spaces, a bin store area, mobility scooter stores, new boundary fencing, four separate small gardens laid to grass and two small areas of 'new low-level hedge/ planting' either side of the vehicle entrance off Cae Gwilym Lane.

1.19 No further details have been provided on the proposed development.

2 Biodiversity Enhancement

Introduction

2.1 Technical Advice Note 5 (Nature Conservation and Planning) (Welsh Assembly Government, 2009)[2] and Wrexham County Borough Council (2011)[3] seek developments to achieve net biodiversity gain. The requirement to secure and maintain net benefit for biodiversity (NBB) (through enhancements) was reinforced in a letter issued by the Chief Planner (Welsh Government) to all planning departments in October 2019. NBB has been defined as '*the concept that development should leave biodiversity and ecosystems in a better state than before, through securing long term, measurable and demonstrable benefit, primarily on site*.'[4]

2.2 This was reiterated in a letter from the Minister for Climate Change to the Heads of Planning dated October 2023. An Annex[5] attached to this letter provided text to update Planning Policy Wales (PPW)[6]. Subsequently, Chapter 6 of PPW has been updated which provides '*further clarity .... on securing net benefit for biodiversity through the application of the step-wise approach, including the acknowledgement of off-site compensation measures as a last resort, and, the need to consider enhancement and long-term management at each step.*'

2.3 WCBC (2011) lists '*examples of how enhancements could be achieved on development sites*'. The options provided include bird-boxes and it is proposed to make provision for House Sparrows (*Passer domesticus*) and Starling (*Sturnus vulgaris*). CIEEM (2022) states that '*a key requirement is that the measures put forward are suitable in the local context of the site*'[7]. It is also proposed to provide a Hedgehog box, transplant *Primula vulgaris* (Primroses) from the lawn at *Target Note 7* into the green space at the corner of Cae Gwilym Lane and Trem Dolydd, and sow the proposed new private gardens with a flowering lawn mix.

2.4 While it is understood that NBB provision should ideally be provided on site it is considered acceptable in this instance to provide the Starling boxes and plant the Primroses in the green space at the corner of Cae Gwilym Lane and Trem Dolydd. This area of land is also owned by WCBC and is directly adjacent to the proposed development site.

2.5 The House Sparrow, Starling and Hedgehog are all priority species. The Primrose flowers and flowering lawns will provide a potential source of nectar for pollinating insects.

[2] Welsh Government (2009). *Planning Policy Wales - Technical Advice Note 5: Nature Conservation and Planning*. September 2009.

[3] Wrexham County Borough Council (2011). *Local Planning Guidance Note 32 Biodiversity and Development*. Adopted March 2011.

[4] https://www.gov.wales/targeted-policy-changes-planning-policy-wales-net-benefit-biodiversity-and-ecosystems-resilience

[5] *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*.

[6] Welsh Government (2024). *Planning Policy Wales. Edition 12: February 2024*.

[7] CIEEM (2022). *Welsh Government's Approach to Net Benefits for Biodiversity and the DECCA Framework in the Terrestrial Planning System. CIEEM Briefing Paper September 2022*. CIEEM, Romsey.

Assessment of Required Level of Provision

2.6 Demolition of the existing building followed by construction of a small block of flats can be categorised as a small/ low impact proposal. It is largely surrounded by hard-standing with some small areas of amenity grassland/ unmanaged species-poor grassland and some ornamental shrub planting. This grassland and shrub planting is of low ecological value. The building is not connected to any other habitat types, and is not close to other valued ecological resources. It is assumed that all existing vegetation within the survey site would be removed during initial site clearance works. It is further assumed that all of the existing trees outside the survey site would be retained unaffected.

2.7 The bat PRA report concluded that the existing buildings are not of particular potential value for (roosting) bats or nesting birds. The loss of these buildings and re-development of the site would not result in a significant impact on any valued ecological resource at this location. NBB provision '*should be proportional to the extent and impact of development*' (CIEEM 2022). The proposed enhancements will therefore target three priority species as well as providing flowers that should be of value for pollinating insects.

Biodiversity Enhancement Recommendations

Flowering Lawn Mix

2.8 The TACP plan - 'Proposed Site Plan – Option 4', dwg. no. CMH-TACP-XX-XX-DR-A-7104 Re. P02, dated 16/04/25 – shows that the rear garden will be divided into four separate plots and provided as 'new amenity grass'. It is proposed to sow these lawn areas with the Meadowmania 'Flowering Lawn Meadow Mix'[8]. This seed mix includes twelve native wildflowers along with seven species of grass. If turf is required there are several suitable options[9] [10].

2.9 The Meadowmania flowering lawn mix has been designed to tolerate mowing to a height of about 5 cm for most of the year but a relaxation of the mowing will allow for flowering. It flowers between May and September.

2.10 This seed mix should be sown in the spring (March through to May) or in autumn (late August through to October). It should be sown on a well prepared, bare seedbed. Sow and maintain in accordance with the supplier's instructions.

2.11 Details of the flowering lawn should be provided to the occupants of the new flats so that they can decide whether to relax the mowing during the flowering period. To allow for good flowering the lawn, once established, can be mown down to about 5 cm height every 3 to 6 weeks in the summer. If acceptable mowing could be suspended from around mid-May to the end of July to allow greater flowering but this is not essential. Cuttings should be removed.

[8] https://meadowmania.co.uk/products/wildflower-meadow-for-lawns?variant=45446519980338&country=GB&currency=GBP&utm_medium=product_sync&utm_source=google&utm_content=sag_organic&utm_campaign=sag_organic&gad_source=1&gad_campaignid=21971088127&gbraid=0AAAAD0Ld15nERR01pLrA0xAp-ndRkS35&gclid=CjwKCAjwvuLDBhAOEiwAPtF0VgZ1KQL27JIYtFbON0hgmFgEbIPHxHngYKzPXX85y_DARiBokQV8GxoCi64QAvD_BwE

[9] https://www.wildflower.co.uk/products/wildflower-plugs-and-plants/wildflower-turf/species-rich-lawn-turf.html

[10] https://wildflowerlawnsandmeadows.com/wild-flower-turf/extra-floristic-low-flowering-lawn-turf-with-wild-orchid-seed/

Transplantation of Primroses

2.12 Primroses are locally abundant in the existing lawn at *Target Note 7*. As many of these Primroses as is reasonably possible, should be transplanted into the green space at the corner of Cae Gwilym Lane and Trem Dolydd. They should be planted around the base of trees, along the boundary, and if mowing can be controlled, into the amenity grassland. This could be undertaken in conjunction with school children/ the local community.

2.13 The grass should not be cut until after the Primroses have finished flowering (possibly January to May inclusive). The planted area will need to be defined with some kind of marker posts to minimise the possibility of inadvertent mowing. The grass in the planted area will need to be cut when the Primrose plants have died back, *e.g*. during the summer.

Hedgehog Box

2.14 The Hedgehog (*Erinaceus europaeus*) is a priority species included on *Section 7* of the *Environment (Wales) Act 2016*.

2.15 An 'Impeckable Hedgehog Palace'[11] will be installed at the back of the 'new low-level hedge/ planting' near to the proposed bin-store. It should be located directly adjacent to the southern boundary fence.

2.16 The Hedgehog house should be positioned in a quiet, shady, sheltered, dry location. The entrance should not face into the prevailing wind or north/ northeast, in the direction of cold winter winds. The Hedgehog box will be installed either by, or under the direction of, a suitably qualified ecologist to ensure correct installation.

House Sparrow Nest-boxes

2.17 The Sparrow (*Passer domesticus*) is a priority species included on *Section 7* of the *Environment (Wales) Act 2016* and the Amber List of Birds of Conservation Concern in Wales[12].

2.18 An 'Impeckable House Sparrow Six'[13] nest-box will be installed. The nest-box could be ordered in Wrexham red. This would provide potential nesting opportunities for at least six pairs of House Sparrow.

2.19 The nest-boxes should be attached to the northern elevation (gable end) of the proposed new building. This elevation contains no windows or doors and faces out onto the adjacent green space at the corner of Cae Gwilym Lane and Trem Dolydd. These nest-boxes would be attached to the outside of the building at eaves level (beneath the overhang).

2.20 The nest-boxes should be installed as high above ground level as possible (though accessible for maintenance), ideally out of direct sunlight, in a sheltered position (possibly towards the eastern side of the northern elevation). They should have unobstructed access. They should be placed in locations where droppings will not cause future nuisance, though it is likely that most faecal matter will be removed from the immediate area around the nest-

[11] https://www.swiftnestboxes.co.uk/index.php/hikashop-menu-for-products-listing/product/53-hedgehog-palace

[12] Johnstone, I.G., Hughes, J., Balmer, D.E., Brenchley, A., Facey, R.J., Lindley, P.J., Noble, D.G. & Taylor, R.C. (2022). Birds of Conservation Concern Wales 4: the population status of birds in Wales. *Milvus*.

[13] https://www.swiftnestboxes.co.uk/index.php/hikashop-menu-for-products-listing/product/31-house-sparrow-six-chamber-colony-nest-box

box by the parent birds. These nest-boxes will be installed either by, or under the direction of, a suitably qualified ecologist to ensure correct installation.

Starling Nest-boxes

2.21 The Starling (*Sturnus vulgaris*) is a priority species included on *Section 7* of the *Environment (Wales) Act 2016* and the Red List of Birds of Conservation Concern in Wales.

2.22 Two 'Impeckable Starling nest-boxes'[14] will be installed on the trees in the green space at the corner of Cae Gwilym Lane and Trem Dolydd. A decision on the most suitable tree to be used will be made on the day of installation. It is acknowledged that this location is just outside the site boundary, however it is within land controlled by the applicant.

2.23 The nest-boxes would be sited out of reach (though accessible for maintenance), 3 m or more off the ground, with a clear flight-path. Both of the nest-boxes would be located somewhere between (facing) north through east; avoiding prevailing winds and direct sunlight where possible. Ideally, they will be located in a small group (on adjacent trees) as Starlings are gregarious birds; 3 m or more apart (*e.g.,* Gunnell, Murphy & Williams (2013)[15]). These nest-boxes will be installed either by, or under the direction of, a suitably qualified ecologist to ensure correct installation.

Maintenance and Monitoring

2.24 The importance of securing long-term management/ maintenance and monitoring is central to the NBB approach (*e.g.,* CIEEM 2022). This should also be proportional to the scale and impact of the development.

2.25 The transplanted Primroses and the flowering lawns should be checked annually by Wrexham County Borough Council as part of ongoing maintenance. The flowering lawns may need some aftercare until properly established. Mowing of the green space should also be monitored to ensure that the Primroses are being left to flower.

2.26 The Starling/ Sparrow nest-boxes will be subject to maintenance annually in November/ December. Bird nest-boxes require annual maintenance as they can become heavily infested with parasites. The nest-boxes will be maintained annually and cleaned if necessary. All maintenance should be carried out when the last bird has left the nest-box; at least October. At least 2 to 3 weeks should be allowed after fledging before undertaking any cleaning. The *Wildlife and Countryside Act 1981*, as amended states that cleaning should only be carried out between 1st August and 31st January and that any eggs present should be destroyed immediately. All nest material should be completely removed and disposed of safely along with any other debris. To ensure that parasite build-up is controlled the inside of the nest-box should be cleansed with boiling water. For safety, this should be undertaken with the nest-box located on the ground. Care should be taken when opening nest-boxes as it is possible that they could be inhabited by bees, wasps or even bats.

2.27 The use of the nest-boxes by Starlings/ Sparrows (or any other species) should be recorded during the nesting season (March to August inclusive). Records of nesting birds should be

[14] https://www.swiftnestboxes.co.uk/index.php/hikashop-menu-for-products-listing/product/50-the-starling-nest-box

[15] Gunnell, K., Murphy, B. & Williams, C. (2013). *Designing for Biodiversity: A Technical Guide for New and Existing Buildings*. Second Edition. RIBA Publishing, London.

submitted to Cofnod[16] (the Local Environmental Records Centre for North Wales). This recording could be undertaken by the users of the new building.

2.28 The Hedgehog house does not necessarily need to be cleaned out (and should not be disturbed if a Hedgehog is in residence). The Hedgehog house should be checked to make sure it remains in working order.

[16] https://www.cofnod.org.uk/Home

3 Reasonable Avoidance Measures

Nesting Birds

3.1 There is existing habitat within the survey site that could be used by nesting birds. This includes the shrub planting at *Target Notes 1* and *2*, and the Ivy covered fences at *Target Notes 2* and *4*. These features are likely to be impacted during initial site clearance works and replacement of the boundary fence. The risk that any active nests may be present during these works is considered to be low but cannot be entirely ruled out.

3.2 If the proposed demolition/ construction proceeds during the bird nesting season (March to August inclusive) a precautionary approach should be adopted. All features within, or in close proximity to, the proposed demolition/ construction site should be checked by a suitably qualified ecologist prior to commencement of any works.

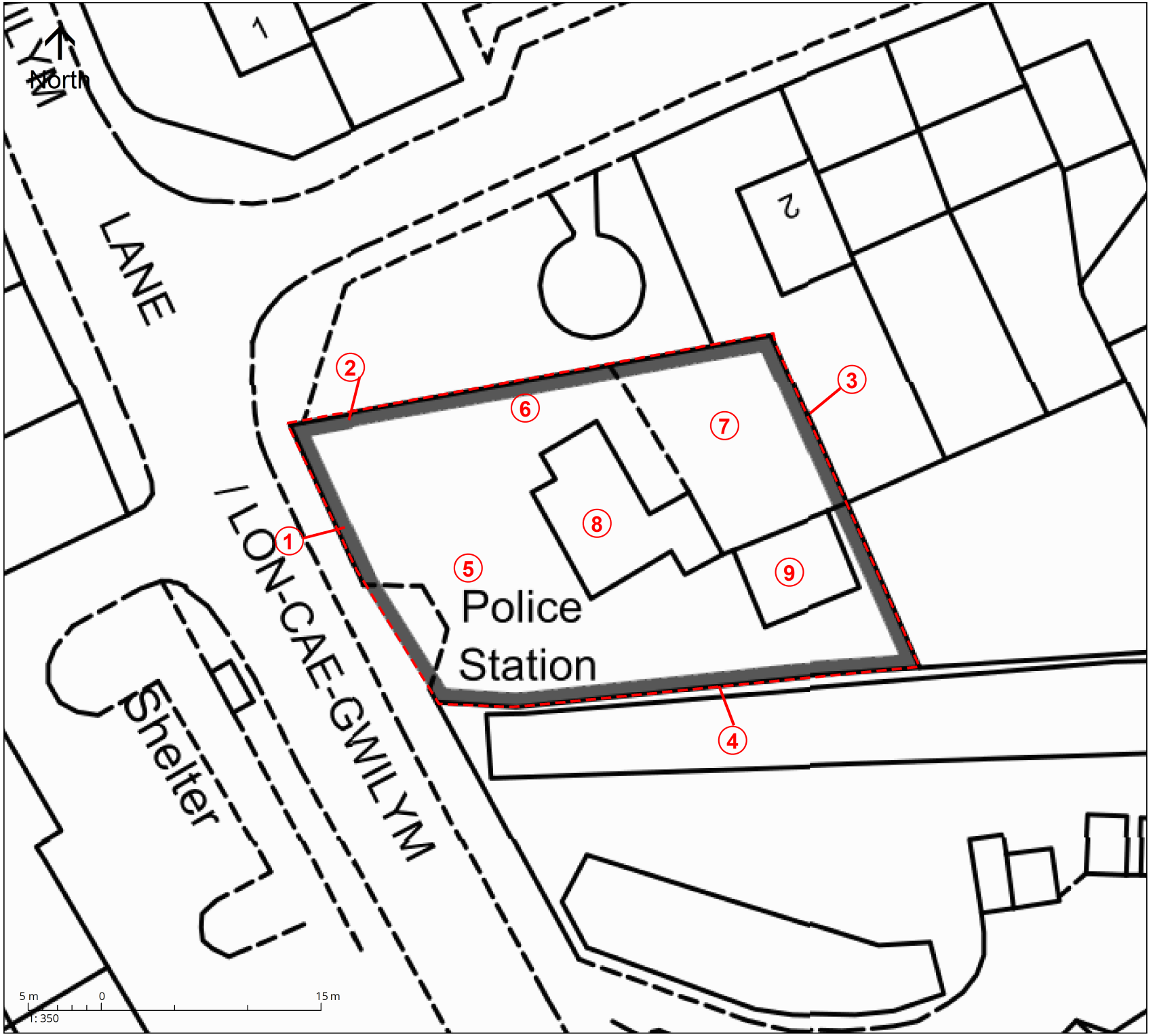
3.3 Should any occupied nests be found at this time or during the works, a buffer zone (determined on the basis of the species concerned and the location of the nest in the context of the surrounding vegetation, but no less than 5 m) would be retained until it can be ascertained that the chicks have left the nest. The buffer zone will be appropriately fenced and signed. This accords with the recommendations of the PRA report.

Hedgehog

3.4 Hedgehogs are known to be present in this area. There are various features within the survey site that could be used as refuges and/ or for hibernation. These include the base of the shrub plantings at *Target Notes 1* and *2*, dense Ivy by the fence at *Target Note 2*, and the accumulations of leaves and other debris around the garage (*Target Note 9*).

3.5 Due to their known presence a precautionary approach should be adopted. Prior to the commencement of site clearance/ demolition works all features within, or in close proximity to, the proposed demolition site should be checked by a suitably qualified ecologist. Hand-searches will be undertaken as necessary. This is likely to include features such as the shrub plantings and the leaves/ debris around the garage.

3.6 Any Hedgehog that may be found (when not hibernating) would be moved to a similar, safe location within suitable habitat nearby. Ideally, this work should not be undertaken within the hibernation period (October/ November to March/ April). However, if it is necessary to undertake the work at this time periods of cold weather should be avoided. Should a hibernating Hedgehog be found, it should be covered back up and left where it is until the end of the hibernation period.



Survey site boundary

Target Note

Base mapping provided by the client.

C566 Proposed Demolition of Former Police Station, 4 Cae Gwilym Lane, Cefn Mawr, Wrexham, LL14 3LT, and Construction of Block of Flats - Biodiversity Statement

***Figure 1* - Target Notes**

Date: 18/02/2025

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