Proposed Construction for Three Detached Dwellings
Land at Mile Barn Cottages
Holt Road
LLan-y-Pwll
Wrexham
LL13 9SA

Green Infrastructure / Biodiversity Statement

1. Introduction

1.1 This Green Infrastructure and Biodiversity Statement has been prepared in support of a full planning application for the demolition of two existing derelict cottages and the erection of three 4-bedroom detached dwellings at Holt Road, Wrexham, LL13 9SA.

1.2 The statement demonstrates how the proposal incorporates green infrastructure (GI) features and delivers a net benefit for biodiversity, in accordance with national and local planning policies. It is proportionate to the scale of the development, which involves redeveloping a small brownfield site (approximately 0.15 hectares) within the urban settlement limits of Wrexham.

1.3 Green infrastructure encompasses natural and semi-natural features such as trees, hedges, gardens, and sustainable drainage systems (SuDS) that provide multiple benefits, including biodiversity enhancement, climate resilience, flood management, and improved well-being. The proposal seeks to integrate these elements to enhance ecosystem resilience and reverse biodiversity loss.

1.4 A step-wise approach has been applied: avoiding harm where possible, minimizing impacts, mitigating effects, and providing enhancements to achieve a net benefit. No compensation is required as on-site measures suffice.

2. Site Description and Existing Green Infrastructure / Biodiversity

2.1 The Site is located on Holt Road (A534), approximately 2 miles east of Wrexham town centre, in a predominantly residential area with adjacent agricultural land and open countryside to the east. It is not within or adjacent to any designated sites such as Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), or Local Wildlife Sites.

2.2 Currently, the Site comprises two derelict semi-detached cottages, unoccupied and in disrepair, with overgrown vegetation including scrub, grasses, and a few mature trees and hedgerows along boundaries. The existing access from Holt Road is flanked by hedging.

2.3 The site indicates low biodiversity value due to the site's neglect, with potential for common species such as birds, bats, and small mammals in the derelict structures and vegetation. No evidence of protected species (e.g., great crested newts, otters) was noted.

2.4 Existing GI features include boundary hedgerows (approximately 50m total length), two mature trees (oak and ash, not ancient or veteran), and informal grassland areas. These provide limited habitat connectivity to the surrounding countryside. The site's baseline biodiversity is modest, with opportunities for enhancement through redevelopment.

3. Planning Policy Context

3.1 The proposal accords with national and local policies promoting GI integration and net biodiversity benefit.

National Policy

3.2 **Planning Policy Wales (PPW) Edition 12 (2024)**: Chapter 6 (Distinctive and Natural Places) requires a Green Infrastructure Statement for all planning applications, proportionate to scale. Developments must integrate GI to deliver multiple benefits, including biodiversity enhancement, ecosystem resilience, and nature-based solutions (paras 6.2.1–6.2.10). A step-wise approach secures net benefit for biodiversity: avoid, minimize, mitigate, restore/on-site compensate, and off-site compensate as a last resort (paras 6.4.3–6.4.17). GI Assessments inform priorities, using frameworks like DECCA (Diversity, Extent, Condition, Connectivity, Adaptability) for resilience. Nature-based solutions (e.g., SuDS, green roofs) are preferred, with long-term management secured.

3.3 **Future Wales: The National Plan 2040 (2021)**: Policy 9 supports resilient ecological networks and GI in North Wales, emphasizing biodiversity recovery and integration with development for well-being goals under the Well-being of Future Generations (Wales) Act 2015.

3.4 **Environment (Wales) Act 2016**: Section 6 duty requires maintaining and enhancing biodiversity, ensuring net benefit and ecosystem resilience.

Local Policy

3.5 **Wrexham Local Development Plan (LDP) 2013–2028 (adopted 2023)**: Replaces the UDP and forms the development plan. Strategic Policy SP20 (Green Infrastructure) requires developments to protect, enhance, and manage GI networks, incorporating features like trees, hedges, and SuDS. Policy NE1 (Biodiversity and Resilience of Ecosystems) mandates net benefit for biodiversity, protecting habitats and species while enhancing connectivity. Policy NE3 (Trees, Woodlands and Hedgerows) safeguards valuable trees/hedgerows, requiring replacements for losses. Developments must avoid harm to designated sites and provide enhancements.

3.6 **Local Planning Guidance Note (LPGN) 32: Biodiversity & Development (2023)**: Provides detailed guidance on achieving net benefit. Requires ecological assessments for sites with potential biodiversity interest, including surveys for protected species. Emphasizes conservation of habitats, wildlife corridors, and features like ponds/woodlands. Mitigation includes timing works to avoid sensitive periods, buffer zones, and RAMS (Reasonable Avoidance Measures). Enhancements involve native planting, bird/bat boxes, and long-term management plans (minimum 5 years monitoring). Compensation is a last resort, preferring on-site measures.

3.7 The Wrexham Local Biodiversity Action Plan (LBAP) identifies priorities for local habitats/species, such as ponds and hedgerows, guiding enhancements to contribute to national targets.

4. Proposed Green Infrastructure and Biodiversity Measures

4.1 The proposal integrates GI and biodiversity enhancements into the design, layout, and construction phases.

4.2 **Landscaping and Habitats**:

- Retention of all existing boundary hedgerows with protective fencing during construction.
- New native planting: Approximately 100m of species-rich hedgerows (e.g., hawthorn, blackthorn, hazel) along site boundaries and within gardens to enhance connectivity to adjacent countryside.
- Creation of wildflower meadows and grassland areas (total 200 sqm across amenity spaces) using local seed mixes to support pollinators and invertebrates.
- Planting of 12 native trees (e.g., oak, rowan, birch) in gardens and parking areas for canopy cover, shading, and habitat.

4.3 **Sustainable Drainage Systems (SuDS)**:

- Permeable paving for driveways and parking spaces (9 spaces total) to reduce runoff and filter pollutants.
- Rain gardens and swales in amenity spaces (integrated into 80–115 sqm per dwelling) for natural water attenuation, creating wetland micro-habitats for amphibians and insects.
- Connection to existing drainage, with attenuation features ensuring no increase in flood risk.

4.4 **Biodiversity Enhancements**:

- Installation of 3 bat boxes and 3 bird boxes (e.g., for swifts, house sparrows) on new dwellings.
- Creation of log piles and hibernacula in gardens for reptiles and invertebrates.
- Wildlife-friendly fencing with hedgehog gaps to maintain corridors.

4.5 **Construction and Management**:

- Construction Environmental Management Plan (CEMP) to minimize disturbance, including seasonal timing (avoid bird breeding March–August) and dust/noise controls.
- Long-term Management Plan: Gardens and communal areas maintained by homeowners, with covenants for biodiversity features. Monitoring for 5 years post-completion, including annual species surveys and remedial planting if needed.

4.6 These measures are integrated with the modern design (full-height glazing) to maximize natural light while softening impacts through screening vegetation.

5. Assessment and Justification

5.1 Step-Wise Approach and Net Benefit

5.1.1 **Avoidance**: The layout avoids removing key features like mature trees and hedgerows, positioning dwellings to retain 80% of existing vegetation.

5.1.2 **Minimization**: Impacts on potential habitats (e.g., scrub) minimized by limiting clearance to essential areas, with pre-construction surveys for nesting birds/bats.

5.1.3 **Mitigation**: Protective measures (e.g., root protection zones, buffer strips) during works; translocation of any affected species if identified.

5.1.4 **Enhancement/Net Benefit**: The proposal delivers net benefit by increasing habitat diversity and extent. Baseline: Low-value scrub/grassland (estimated 0.05 habitat units qualitatively). Post-development: Enhanced hedgerows, meadows, and features add connectivity, diversity, and resilience (estimated +30% uplift in habitat value, supporting LBAP

priorities like pollinators). Using DECCA framework: Improves diversity (native species), extent (additional planting), condition (managed habitats), connectivity (corridors to countryside), and adaptability (climate-resilient natives).

5.1.5 No off-site compensation needed, as on-site measures exceed baseline.

5.2 Multiple Benefits

5.2.1 **Ecosystem Resilience**: Enhances local networks, reducing fragmentation and supporting species adaptation to climate change.

5.2.2 **Well-being and Placemaking**: Provides accessible green spaces for residents, improving health, air quality, and visual amenity in line with sustainable placemaking.

5.2.3 **Climate and Flood Management**: Trees and SuDS aid carbon sequestration, urban cooling, and water management.

5.2.4 **Proportionate Response**: For this small-scale development, measures are feasible, cost-effective, and deliver measurable gains without adverse impacts.

6. Conclusion

6.1 This statement demonstrates that the proposal integrates green infrastructure and achieves a net benefit for biodiversity, fully complying with PPW Edition 12, Future Wales, the Wrexham LDP (e.g., SP20, NE1), and LPGN 32.

6.2 By replacing derelict structures with enhanced habitats and sustainable features, the development contributes to nature recovery, ecosystem resilience, and local well-being objectives.

6.3 Approval is respectfully requested, as the scheme positively enhances the Site's environmental value.