Land East of Bryn Lane, Wrexham Industrial Estate

Green Infrastructure Statement

July 2026

Q250979

Report

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1 Introduction

1.1 This Green Infrastructure Statement (GIS) has been prepared by Quod on behalf of 'Elite Onyx Properties (UK) SARL' (the "Applicant") to support an outline planning application for employment development at land to the east of Bryn Lane, Wrexham Industrial Estate ("the Site").

1.2 The Site falls within the wider Wrexham Industrial Estate (WIE), the largest industrial estate in Wales. The Site lies adjacent to an existing warehouse occupied by the Very Group (also within the Applicant's ownership) along the eastern boundary of the WIE. It comprises a vacant and derelict previously developed land.

1.3 The proposal development will provide up to 15,000sqm of new floorspace for industrial and/or storage or distribution uses (Use Class B2 and/or B8). Development would either comprise an extension to the existing warehouse, or a separate standalone building. The application is submitted in outline, with all matters reserved excluding access. The principle of development at this Site for employment uses is strongly supported and encouraged by national and local planning policy.

1.4 It is the objective of this GIS to describe how green infrastructure has been incorporated into the proposed development.

1.5 This document has been produced in reference to the recently updated legislation contained in Chapter 6 of the Planning Policy Wales (February 2024) which sets out the policies to support 'Distinctive and Natural Places'.

> *"The Distinctive and Natural Places theme of planning policy topics covers historic environment, landscape, biodiversity and habitats, coastal characteristics, air quality, soundscape, water services, flooding and other environmental (surface and sub-surface) risks."*

1.6 This document should be read alongside documents other documents prepared in support of the outline planning application, including, but not limited to, the following:

- Design and Access Statement
- Parameter Plan and Illustrative Masterplans
- Ecological Impact Assessment (including NBB) and GCN Mitigation Strategy
- Arboricultural Impact Assessment
- Phase 1 Ground Conditions Report
- Flood Consequences Report and Drainage Strategy
- Shadow HRA and Appropriate Assessment

2 Factual Background

The Site and Surroundings

2.1 The Site lies within the east of Wrexham Industrial Estate (WIE) and extends to approximately 5ha. The Site is approximately 5km west from Wrexham Town Centre.

2.2 The Site largely comprises existing hardstanding associated from its past use as servicing and storage areas for the neighbouring warehouse, also within the Applicant's ownership. Some parts of this hardstanding have become overgrown in recent years with areas of scrub. The existing servicing yard to the east of the existing warehouse is still in use and will be retained as part of the proposals. To the far east of the Site lies a drainage ditch with significant areas of shrubs and tree planting, along with further areas of planting to the south.

2.3 Immediately to the west of the Site is the existing warehouse occupied by The Very Group. This comprises a single storey of circa 23,876sqm, along with servicing areas, parking and access. To the south of the Site comprises further warehouses also within the Applicant's ownership. Photographs of the Site are included within the Design and Access Statement.

2.4 The whole of the Site falls within the WIE settlement boundary. WIE is known to support a population of Great Crested Newts (GCNs). Indeed, surveys have been carried out on the Site, given the number of ponds in close proximity, which have identified the protected species within the Site boundary.

2.5 The entirety of the Site is within Flood Zone 1. There is a public right of way (PROW) along the eastern and southern boundary of the Site but does not affect the proposals.

2.6 The River Lee / Bala Lake Special Area of Conservation (SAC) is located circa 2.5km to the west of the Site.

Trees / Landscaping

2.7 A Tree Survey and Arboricultural Impact Assessment (AIA) have been prepared in support of this outline application. This surveys the eight groups of trees and two individual trees located within the site boundary. There are no known Tree Preservation Orders on the Site.

2.8 Three groups of trees (G2, G3, G4) and one tree (T9) are categorised as C2 (of lowest quality). Three groups of trees (G1, G5, G7) and one tree (T1) are categorised as B2 (of moderate quality) and one group (G6) is categorised as A2 (highest quality). One group, G8, was not accessible thus has not been categorised, however will be clear of the development area, thus will be retained regardless.

2.9 The tree constraints and protection plan have been based on the maximum development extent, thus presents a worst-case scenario for tree removal. The actual required removal of trees will only be known once the detailed design has been determined.

2.10 On a worst-case basis, to facilitate the development groups / trees G2, G3, G4, T9 (category C2) and G1, T1 (category B2) require removal. Groups G5, G7, G8 (category B2 and A2) will be retained and protected. The retained groups of trees are those of the highest quality within the Site and will be protected during construction with tree protection measures.

2.11 Overall, the tree survey and AIA conclude that, with mitigation, the development can be accommodated without resulting in a significant adverse arboricultural impact.

Ecology

2.12 An Ecological Impact Assessment (EcIA) and Great Crested Newt (GCN) Survey Report and Outline Mitigation Strategy has been undertaken by Ecology Solutions and accompanies the outline application.

2.13 The Assessment identifies GCNs within and surrounding the Site, being a protected species, thus relevant surveys have been undertaken. An appropriate mitigation strategy is therefore being established to ensure no significant impact on this protected species. This is further explained in the following section.

2.14 The GCN Report recommends that mitigation to the GCN's would incorporate a range of habitat enhancement measures focused within a substantial retained habitat area along the eastern boundary. In turn, this would also provide significant benefit to reptiles and terrestrial invertebrates. This would include selective shrub clearance, retention and reuse of cut scrub to provide sheltering opportunities, creation of shallow scrapes and installation of purpose-built hibernacula. Collectively, these measures will improve habitat connectivity and increase the ecological functionality of retained areas surrounding the development site.

Ground Conditions

2.15 A Phase 1 Preliminary Risk Assessment has been prepared by Curtins. Until 1972, the Site was undeveloped agricultural land, following which a fiberglass factory was constructed. This was demolished in 2005 with Site left vacant in its current layout.

2.16 Whilst records do not indicate the presence of Made Ground on site, given the historic land use and current setting of the Site, it has been considered likely that Made Ground soils will be present. Asbestos materials may also be present in soils, along with potential contaminants associated with the fibreglass manufacturing works. it is considered there is limited potential for ground gas generation due to the potentially infilled ponds adjacent and near to the site.

2.17 This identifies that the initial assessment identifies that the majority of pollutant linkages are of moderate / low risk to construction works and end users.

2.18 Further assessments have been recommended, and conditions are welcomed on any determination for these to be submitted and approved by the LPA in advance of development commencing. This includes undertaking an intrusive ground investigation and ground gas monitoring.

2.19 Full details can be found within the report submitted with this application.

Flood Risk and Drainage / Nutrient Neutrality

2.20 This planning application is accompanied by a Flood Consequence Report (FCR) and Drainage Strategy. The report has been prepared in line with PPW Technical Advice Note 15.

2.21 The Site lies within Flood Zone 1, and a drainage ditch runs along the eastern boundary of the Site. Part of the Site includes areas classed as Flood Risk Zone 2/3 from surface water and small watercourses. The extent of this flooding from the small watercourses is retained within the drainage ditch only and does not encroach onto the built development site. Flood risk from surface water us due to the presence of low points within the development area. The FRA concludes that the flood risk for the site indicates that the proposed development is suitable.

2.22 The existing drainage ditch is proposed to be used for surface water runoff. This reflects the existing position. In addition, the use of swales has been proposed as acceptable at the Site to deliver SUDS. This will also provide additional benefits in terms of visual landscaping amenity as well as provide biodiverse corridors with suitable planting along any swales. Further information is provided within the enclosed Drainage Strategy, with full details subject to reserved matters applications.

2.23 The River Dee/Bala Lake SAC sits circa 2.5km to the east of the Site. The proposed development will discharge to the public sewer system which drainage to the Five Fords Wastewater Treatment Works (WwTW), which in turn discharges into the River Dee.

2.24 A shadow Habitat Regulations Assessment (HRA) and Appropriate Assessment (AA) has been undertaken to assess the impact of the water quality with regards to phosphorus within the SAC river catchment. This has been prepared in consultation with Welsh Water. It will provide WBC with the relevant information, as the LPA, to formally undertake the HRA and AA, to assess the implications of phosphorus on the River Dee, and what mitigation measures need to be put in place to ensure there is no significant effect on the SAC.

3 Green Infrastructure Strategy

Planning Policy Wales (Edition 12, February 2024)

3.1 Planning Policy Wales ('PPW') sets out the national context for sustainable land use. The document supports all strategies published by the Welsh Assembly and is supported by various Technical Advice Notes ('TANs').

3.2 PPW recognises that the planning system manages the development and use of land in the public interest by contributing to economic, social, environmental and cultural well-being of Wales.

3.3 Chapter 6 seeks to integrate and prioritise the natural environment into design of the proposed development.

3.4 Paragraph 6.2.12 of PPW outlines that GIS 'should' be submitted with all planning applications. PPW states that the GIS should be:

> *'proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach has been applied.'*

3.5 This GIS has been provided in line with the relevant policies which have informed the design development of the proposal.

Landscaping

3.6 The application is submitted in outline with matters of landscaping to be reserved (along with scale, appearance and layout). The submitted Parameter Plan sets out the maximum development extent, along with the existing areas of landscaping to be retained and enhanced along the southern and eastern boundaries. Further details of how this existing landscaping will be enhanced for mitigation purposes is set out in the following ecological heading.

3.7 Landscape has also been considered within the illustrative masterplans, submitted to show how the development of the Site could look, in line with the parameters. Within the development extent, there are opportunities for landscaping to be incorporated into the layout. This could include areas along the northern boundary along the required fire tender route and around the car parking area; adjacent to the existing servicing yard (which is to be retained); and through provision of enhanced landscaping along the southern and eastern borders where this abuts the existing areas of planting.

3.8 Any new landscaping will utilise native trees and shrubs, with species selection seeking to maximise ecological value. Native planting is expected to attract night-flying invertebrates, which in turn may provide other opportunities for bats and other species.

3.9 It is considered that with the protection and enhancement of the retained landscaping areas, and provision of additional landscaping and, the proposals will provide improvements to the landscaping across the Site.

3.10 Full details of landscaping will be submitted at reserved matters stage, in line with the controls and parameters set out within the outline consent, once the detailed design of the scheme is known.

GCN and Ecological Mitigation

3.11 The GCN Report recommends that mitigation to the GCN's would incorporate a range of habitat enhancement measures focused within a substantial retained habitat area along the eastern boundary. in turn, this would also provide significant benefit to reptiles and terrestrial invertebrates. This would include selective shrub clearance, retention and reuse of cut scrub to provide sheltering opportunities, creation of shallow scrapes and installation of purpose-built hibernacula. Collectively, these measures will improve habitat connectivity and increase the ecological functionality of retained areas surrounding the development site.

3.12 In addition, the provision of new bird boxes on the building and/or in retained trees, and sensitive design of drainage, surface water runoff and lighting strategies will prevent impacts/.

Drainage / Nutrient Neutrality

3.13 This planning application is accompanied by a Flood Consequence Report (FCR) and Drainage Strategy, prepared in line with TAN 15.

3.14 The existing drainage ditch is proposed to be used for surface water runoff. This reflects the existing position. In addition, the use of swales has been proposed as acceptable at the Site to deliver SUDS. This will also provide additional benefits in terms of visual landscaping amenity as well as provide biodiverse corridors with suitable planting along any swales. Further information is provided within the enclosed Drainage Strategy, with full details subject to reserved matters applications.

Low Carbon Technologies

3.15 As the application is submitted in outline only, the submitted masterplans are illustrative only and show ways in which the development could come forward. Notwithstanding, this shows there is the ability to provide 10% Electric Vehicle (EV) parking spaces and passive provision for at least 50% of the remaining spaces, as required by Future Wales Policy 12 and Building Regulations.

3.16 The Energy and Sustainability Statement also demonstrates that a scheme can achieve BREEAM 'Very Good' rating and could deliver low carbon energy measures such as Solar Photovoltaic (PV) panels and air source heat pumps.

Conclusion

3.17 Full consideration has been given to a wide range of landscape enhancements and improvements which have been proposed as part of the proposed development and can be incorporated into the detailed design at reserved matters stage where relevant. The scheme is capable of providing new planting and enhancements to the existing landscape to mitigate environmental impacts and elevate biodiversity, as well as ensure protection to a protected species.

3.18 It is considered that the proposed scheme complies with the updated Chapter 6 of Planning Policy Wales which sets out the policy for biodiversity and nature.

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