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PLANNING AND REGENERATION

Green Infrastructure Statement

Client Name: The British Land Company PLC

Site Address: Land to the north of Broughton Shopping Park, Chester Road, Broughton

Date: January 2026

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Introduction

1.0 Introduction

1.1 Introduction

1.1.1 This report has been prepared by CarneySweeney on behalf of The British Land Company Plc. It sets out the proposed Green Infrastructure (GI) enhancements for the development of land at north of Broughton Shopping Park, Chester Road, Broughton, herein referred to as 'the Site'.

1.1.2 The development proposals comprise the erection of a Class A1 retail foodstore, together with surface-level car parking, landscaping, and associated works.

1.2 Purpose, Legislation and Planning Policy

1.2.1 The purpose of this statement is to provide an overview of the existing habitats, tree stock and GI on the Site and their condition. The statement also details potential development impacts (in the absence of mitigation) and proposed GI enhancements.

1.2.2 The definition of Green Infrastructure in Chapter 6 of Planning Policy Wales 12 (PPW 12, February 2024) is as follows:

'Green infrastructure is the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Component elements of green infrastructure can function at different scales and some components, such as trees and woodland, are often universally present and function at all levels. At the landscape scale green infrastructure can comprise entire ecosystems such as wetlands, waterways peatlands and mountain ranges or be connected networks of mosaic habitats, including grasslands. At a local scale, it might comprise parks, fields, public rights of way, allotments, cemeteries and gardens or may be designed or managed features such as sustainable drainage systems. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks'.

1.2.3 The Environment (Wales) Act 2016 provides a context for the delivery of multi-functional green infrastructure. Its provision can make a significant contribution to the sustainable management of natural resources. Green infrastructure is capable of providing several functions at the same time and as a result offers multiple benefits, for social, economic and cultural as well as environmental resilience and respond to challenges presented by the climate emergency.

1.2.4 A Step-Wise Approach is required to be demonstrated in the Green Infrastructure Statement to assess impacts on habitats and species, as set out in Figure 12 of PPW12 and shown overleaf. These steps will indicate how Net-Benefit-for-Biodiversity is achieved.

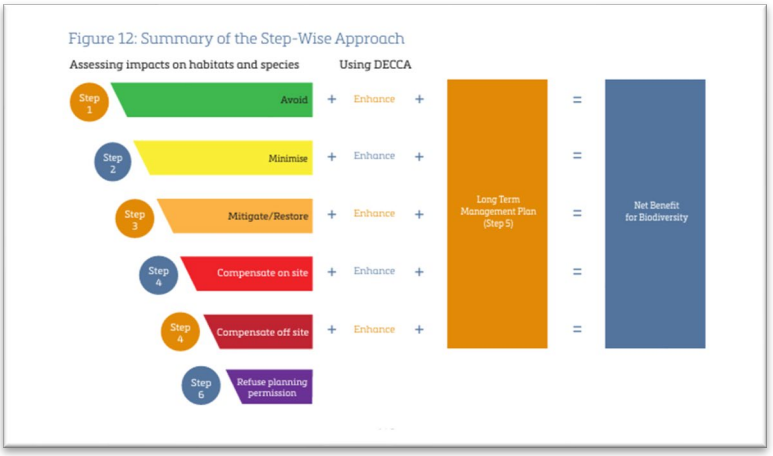

Figure 1.2 Extract from PPW 12.

1.2.5 The statement has been produced in accordance with requirements outlined in Chapter 6 of PPW 12, which can be summarised as follows:

- **Green Infrastructure (GI):** stronger emphasis on taking a proactive approach to GI, covering cross boundary considerations, with the submission of a proportionate GI statement with planning applications.
- **Net Benefit for Biodiversity and the Step-wise Approach:** further clarity is provided 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. The use of the GI statement as a means of demonstrating the stepwise approach is made explicit.
- **Trees and Woodlands:** closer alignment with the stepwise approach, along with promoting new planting as part of development based on securing the right tree in the right place. It also specifies that where trees are lost to facilitate development *"Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must preferably be onsite, or immediately adjacent to the site, and at a minimum of at least 3 trees of a similar type and compensatory size plated for every 1 lost".*

1.2.6 As stated with para 6.2.12 of PPW 12, a green infrastructure statement should be submitted with all planning applications. These are to be *"proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. The green infrastructure statement will be an effective way of demonstrating 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".*

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SECTION 2

Site Baseline and Development Impacts

2.0 Site Baseline and Development Impacts

2.1 Site Description

2.1.1 The application site is located in the northeast of Broughton at the junction of Chester Road with the Broughton Shopping Park link road. The site is irregular in shape and extends to an area of c.1.3 hectares.

2.1.2 The site contains no buildings or other structures and is currently unused, comprising rough featureless grass interspersed with trees and bushes. There is no means of vehicular or pedestrian access to the site at present.

2.1.3 Broughton Shopping Park (also owned by the applicant) is located to the south of the site. To the north, beyond Chester Road, lies a public house (The New Glynne Arms), two residential properties (No. 1 and 2 Glynne Cottages), a veterinary practice and BAE Airbus and Hawarden airport.

2.2 Site Baseline

2.2.1 Desktop studies and field surveys have been carried out to confirm the green infrastructure features at the site and its surrounding context. The elements that are considered to form the existing Green Infrastructure are:

- Trees and vegetation:
- Ecology; and
- Drainage and Hydrology.

Trees and vegetation

2.2.2 A tree survey was undertaken by Treefellas in support of this application. The survey recorded all individual trees and tree groups with one or more stem diameters of 75mm or greater at a height of 1.5m above ground level, as well as any significant hedgerows within the Site boundary. In addition, any notable trees outside the boundary that could be significantly affected by the future development of the Site were also documented. The tree survey defined a hedgerow as a line of trees or shrubs with canopies less than 5m wide that have been regularly managed through pruning. Where individual trees within a hedgerow were significantly different in character from the remainder, these were identified and recorded separately.

2.2.3 The tree survey describes the site as comprising a disused and overgrown parcel of land located immediately north of the car parks and commercial units of Broughton Shopping Park, within the village of Broughton, Flintshire. The majority of the Site consists of dense grasses and shrubs, with more substantial vegetation concentrated near the boundaries and within the western half.

2.2.4 The survey recorded a total of nineteen individual trees and four tree groups. No trees or tree groups were identified within Category A or Category U. Twelve individual trees were classified as Category B, while seven individual trees and four tree groups were classified as Category C, resulting in a total of eleven features within this category.

Ecology

2.2.5 A Preliminary Ecology Appraisal (PEA) was conducted by Greengage in August 2023 and an updated site walkover was produced in August 2025 with an updated technical note produced on 22 January 2026. The PEA provides the following information.

Desktop Study

2.2.6 No statutory designates sites of national or international importance within the boundary of the site or within a 2 km radius. The nearest statutory designation of international importance is River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid Special Area of Conservation (SAC), approximately 2.5km northwest of the site at its nearest point.

2.2.7 The site is located 1.45km north east of one non-statutory Wildlife Site – Mold Junction Triangle Wildlife Site, a disused railway junction designated for its species-rich grassland, silver birch pendula scrub and uncommon plant species that support a variety of butterflies.

2.2.8 There are no Biodiversity Action Plan (BAP) priority habitats on site, but BAP priority Pond is located approximately 200m from of the site.

Habitats

2.2.9 The PEA and updated walkover confirmed the detailed habitat description as:

- H3h – mixed scrub (530 – Ecotone)
- G4 – Modified grassland with [10 – scattered scrbu [128 – tail tussock sward]; [124 – anthills]
- Wl33 – Line of trees; and
- H3d – Bramble scrub

Protect Species

2.2.10 Badgers: The PEA recorded no evidence of badgers during the site survey, and no evidence of sett excavation was observed.

2.2.11 Bats: The PEA recorded numerous bat species at the site and notes that the habitat structure provides value for foraging bats. Overall, the PEA considers the site to have moderate potential to support foraging and commuting bats, but negligible potential to support roosting bats.

2.2.12 Great Crested Newts (GCN): There are numerous records of great crested newts within ponds approximately 200m east of the site, collectively known as the Retail Park Newt Reserve. However,

permanent one-way exclusion fencing has been installed along a pedestrian footpath between the site and ponds, which prevents GCN from entering the site while allowing them to leave and return to breeding ponds. The fencing is intact and has been in place for approximately 10 years, based on historical reporting. Vegetation adjacent to the fencing is regularly mown short, indicating appropriate management to prevent GCN access. A plan showing the fence location is provided in Appendix B of the PEA. Given the duration of fencing and the presence of extensive suitable terrestrial habitat adjacent to the ponds, it is highly unlikely GCN would attempt to cross the fencing and reach the site, although there is one minor gap of approximately 1cm midway along its length. Owing to the presence of fencing, the PEA concludes that the site has negligible potential to support GCN, despite having suitable terrestrial habitat.

2.2.13 Reptiles: The PEA confirms that the habitat is suitable for reptiles, but no direct evidence was found. The PEA concludes that the site has negligible potential to support reptiles.

2.2.14 Dormouse, Water Vole, Otter: The PEA confirms that no evidence was recorded and that the habitat is unsuitable or highly unlikely to support these species. The PEA concludes that the site has negligible potential for these species.

2.2.15 Birds: No birds were recorded during the site survey; however, there are records of numerous species within 2km of the site. Overall, the PEA concludes that the site has high potential to support nesting birds.

2.2.16 Invertebrates: The PEA notes that while scrub and grassland provide some value for pollinators, this is limited by the lack of floral diversity. The PEA concludes that the site has low potential to support invertebrates.

2.2.17 Protected Plants: No protected plant species were found. The PEA concludes that the site has negligible potential to support them.

2.2.18 Invasive/Non-native Species: No invasive non-native species were recorded, and the PEA considers them likely absent from the site.

2.2.19 Hedgehogs: The PEA recorded no significant findings for hedgehogs. The PEA concludes that the site has low potential to support hedgehogs.

Drainage and Hydrology

2.2.20 The site lies within Flood Zone 1, indicating a very low risk of fluvial flooding, although mapping shows a medium to high risk of surface water flooding. Overall, the Flood Consequences Assessment concludes that the site is at negligible to low risk from all sources, with no specific mitigation required. Ground investigations reveal cohesive soils, primarily firm to stiff clay, making infiltration techniques unsuitable for drainage.

2.3 Development Impacts

2.3.1 The proposals are for the erection of a Class A1 retail foodstore with surface-level car parking, landscaping, and associated development.

2.3.2 The proposed Lidl food store will deliver a contemporary, high-quality retail building that integrates with its surroundings and enhances the streetscape along Chester Road. The store is positioned in the north-eastern part of the site, with customer parking to the south and west, ensuring convenient access and strong visual and physical connections to Broughton Shopping Park. Servicing is located discreetly to the southeast, screened from public areas to minimise visual impact.

Drainage Strategy

2.3.3 The proposed drainage strategy, as outlined by SWF Consulting, is to manage surface water through a combination of permeable paving, a swale, and two dry basins, before discharging to the existing culverted watercourse along the western boundary of the site. Given the location of the Airbus facility to the northwest of the site, and the associated airport, permanent ponds are not acceptable due to the risk of bird strikes. Careful consideration will need to be given to the landscaping to ensure the site increases the current amenity of grassland. Nevertheless, the basins and swale will perform a biodiversity function as well as a drainage function.

2.3.4 Foul water will discharge via gravity to the public combined sewer in Chester Road, with agreement from Dŵr Cymru Welsh Water.

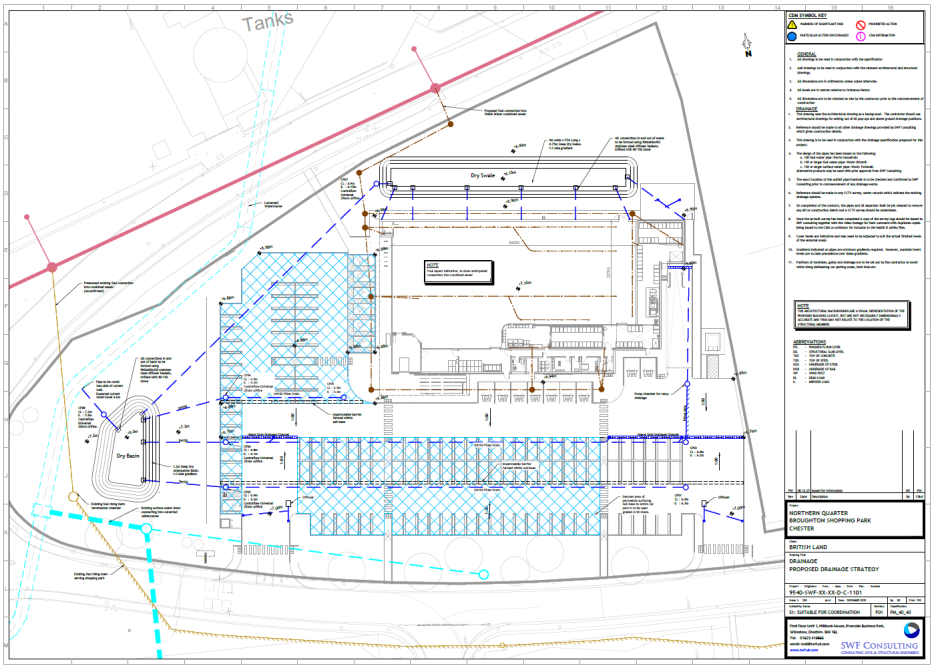

Figure 2.1 Drainage Strategy

Landscape and Planting Strategy

2.3.5 The landscape strategy seeks to retain existing trees along the southern boundary, where possible and introduces structured hedgerows, ornamental planting at entrances, and native species to reinforce site edges. Sustainable drainage features, including two balancing ponds planted with wildflower mixes, enhance biodiversity and visual amenity. These measures create a cohesive, attractive setting that softens the built form and supports ecological value.

2.3.6 The design proposals indicate that six individual trees, comprising four Category B trees and two Category C trees (T006 and T008 to T012), along with sections of three Category C tree groups (G020, G021, and G023) will need to be removed to facilitate the development. These trees and groups are located within the footprint of, or in close proximity to, proposed structures and accesses, and their retention and protection is not considered feasible.

2.3.7 The planting strategy includes a mix of trees, native hedgerows, shrubs, and herbaceous plants to create a varied and resilient landscape structure. A total of 21 new trees will be planted on site, in accordance with PPW 12 paragraph 6.4.42, which promotes a 3:1 replacement ratio to mitigate tree loss.

2.3.8 All new and existing trees, planting and turfing shall be maintained for twelve months following practical completion by the landscape contractor. There shall be a minimum of 18 maintenance visits per year. Consisting of biweekly visits between March and October inclusive. Maintenance visits shall be monthly for November to February inclusive.

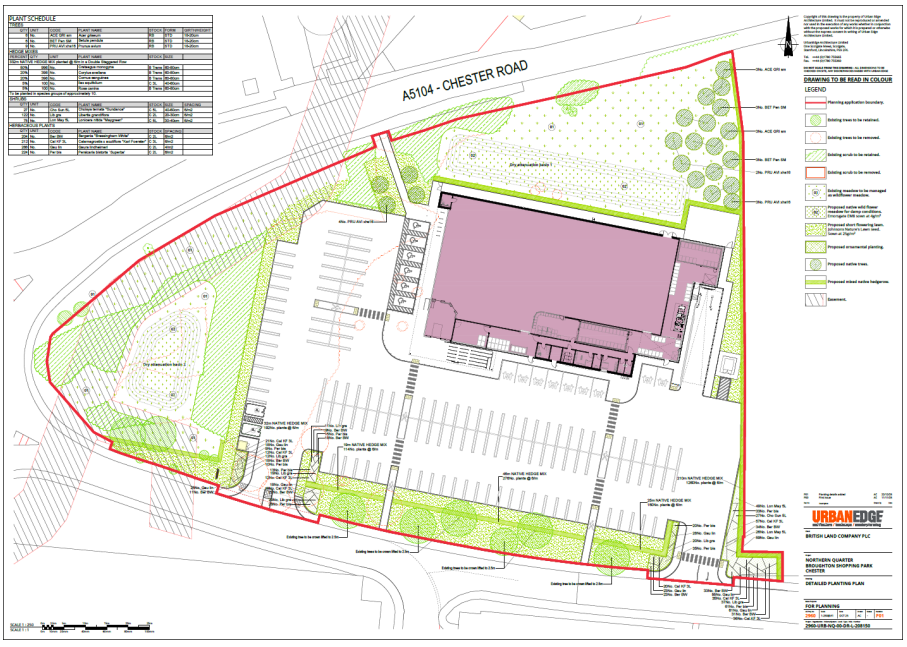

Figure 2.2 Planting Plan

2.4 Net Benefit for Biodiversity and the Step-wise Approach

2.4.1 The Proposed Development seeks to follow the Stepwise Approach as detailed within Chapter 6 of PPW12, by implementing the following:

1. **Avoid**
2. **Minimise**
3. **Mitigated**
4. **Compensation**

Step 1 – Avoid

2.4.2 The site layout has been designed to avoid unnecessary impacts on existing trees and vegetation along the site boundaries. All retained trees and boundary vegetation will be protected during construction, with machinery exclusion enforced in accordance with BS 5837:2012. This ensures that no detrimental impacts will occur.

2.4.3 Site clearance works is to be avoided during the bird nesting season (March to August inclusive) unless the site is checked by a suitably qualified Ecologist and active nests are confirmed to be absent no later than 48 hours before works commence.

A Construction Ecological Management Plan (CEcMP) will be produced, to avoid harm to ecological features and species during site clearance and construction.

Step 2 – Minimise

2.4.4 Any necessary vegetation removal will be timed to avoid the bird nesting season (March-August), with pre-clearance checks by a qualified ecologist undertaken, if works cannot be scheduled outside this period.

2.4.5 During the construction phase, all excavations will either be securely covered overnight or fitted with an appropriate means of escape to minimise the risk of small fauna becoming trapped. In addition, comprehensive pollution control measures will be implemented as part of a detailed Construction Environmental Management Plan (CEMP) to ensure best practice in environmental protection throughout the works. The CEMP will detail control measures for dust deposition and surface water runoff into adjacent habitats.

2.4.6 It is reasonable to assume that GCN are not associated with the site given the presence of roads and exclusion fencing. However, given the high number of records of GCN within the vicinity of the site and the presence of a small gap in the fencing (see appendix B for site photos), it is recommended that the proposed development proceed under a Reasonable Avoidance Measures (RAM) Method Statement. Suitable RAM would include cutting vegetation down to 10cm height to allow any

amphibians and small mammals to exit the site via their own volition via the one-way fence. Clearance should be directional working towards the one-way fencing. Suitable weather constitutes 5 degrees overnight minimum.

2.4.7 Lighting across the site will be designed in accordance with Bat Conservation Trust (BCT) guidance, ensuring minimal light spill onto vegetated boundaries and adjacent habitats. This will safeguard nocturnal species such as bats and foraging birds.

2.4.8 To minimise bird strike risk associated with the Airport (approximately 800m north of the site), measures such as bird netting, bird scarers and/or bird spikes may be required to deter species frequently implicated in bird strikes.

Step 3 - Mitigate

2.4.9 The landscape design will introduce 21 new individual trees as well as shrub and grassland planting around the perimeter of the site, creating a more attractive and ecologically functional setting. The proposed landscape planting within the site also priorities species native to the local area.

2.4.10 All new and existing trees, planting and turfing shall be maintained for twelve months following practical completion by the landscape contractor. There shall be a minimum of 18 maintenance visits per year. Consisting of biweekly visits between March and October inclusive. Maintenance visits shall be monthly for November to February inclusive.

2.4.11 During construction, mitigation will include standard good practice measures such as tree protection fencing and clearly defined access routes.

Step 4 - Compensation

2.4.12 As the site currently supports limited ecological value. Compensation will focus on long-term biodiversity enhancement and habitat creation. New native tree and shrub planting, together with pollinator-friendly ornamental and species-rich grassland mixes, will provide foraging opportunities.

2.4.13 Opportunities for bird and bat boxes attached to mature retained trees and the proposed building, where this does not increase the risk of bird strikes, will be considered.

2.4.14 Collectively, these compensatory measures will strengthen the ecological value of the site compared to its existing baseline, improving habitat connectivity, supporting pollinator networks, and contributing to a modest but meaningful biodiversity enhancement.

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SECTION 3

Conclusion

3.0 Conclusion

3.1 Resilience of Ecosystems

3.1.1 The Environment (Wales) Act 2016 provides a duty upon public bodies such as Flintshire County Council to promote the resilience of ecosystems.

3.1.2 The proposed green infrastructure strategy would comprise a range of both native and non-native species to enhance biodiversity and botanical diversity. The range of plant species proposed would enhance the biodiversity, increase species diversity, the age diversity of vegetation and improve habitat resilience to climate change.

3.1.3 The proposed green infrastructure strategy has considered the existing green infrastructure features within and beyond the site boundary and retained those of value, as recommended by the Stepwise approach. Proposed green infrastructure features would increase the biodiversity, species diversity, and habitat structure on the site whilst contributing to the multi-functionality of the green infrastructure elements.

3.2 Green Infrastructure

3.2.1 The proposed development has been designed with a comprehensive Green Infrastructure strategy that integrates ecological and landscape measures across the site. Existing boundary vegetation has been retained wherever feasible to maintain local green cover and ecological continuity. During construction, mitigation measures such as the careful timing of vegetation clearance, species protection (particularly for nesting birds and hedgehogs), and the use of sensitive lighting will ensure ecological receptors are safeguarded.

3.2.2 Enhancement and compensation measures, including new native and ornamental tree and shrub planting, pollinator-friendly species will provide long-term biodiversity benefits within the redeveloped site. Permeable surfacing across parking areas contributes to sustainable surface water management and a greener site character.

3.2.3 Although the development primarily serves a commercial function with limited scope for amenity provision, the proposals would deliver a net ecological enhancement through targeted planting and habitat features. Overall, the scheme will not result in significant adverse ecological effects and will provide a visually improved, biodiverse, and environmentally responsible development.

3.3 Conclusions

3.3.1 With regards to the Placemaking Wales Charter, the landscape proposals make a good contribution towards the six placemaking principles, which cover the range of considerations that contribute to establishing and maintaining good places.

3.3.2 The proposals contribute well to the Standards of Building with Nature, creating well connected, multi-functional green infrastructure.

3.3.3 Overall, the proposed development is considered to be in accordance with PPW 12 Chapter 6.