

Demolition and Redevelopment of Onllwyn Road Bridge

**(Pont y Offeiriad / Clergyman's Bridge)
Onllwyn
Neath**

Green Infrastructure Statement

February 2024

CONTROL SHEET

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Green Infrastructure Statement

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1.0 Introduction

- 1.1. Fairhurst have been instructed by Global Centre for Rail Excellence (GCRE) Ltd (hereby referred to as 'the Applicant') to produce a Green Infrastructure Statement in support of a Planning application (LPA Ref: P2024/0011) to Neath Port Talbot County Borough Council (NPTCBC) for the following extent of development:

'Demolition and redevelopment of an existing bridge, including the provision of landscaping and associated development'

- 1.2. This Green Infrastructure Statement specifically relates to the proposed development taking place on land at and surrounding Pont y Offeiriad (Clergyman's Bridge), Onllwyn Road, Onllwyn.

Definition of Green Infrastructure

- 1.3. Planning Policy Wales (PPW) 12 recognises that:

"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".

- 1.4. NPTCBC's Biodiversity and Geodiversity Supplementary Planning Guidance (SPG) (May 2018) references the Landscape Institute's¹ definition of Green Infrastructure, who recognises that it constitutes:

"...the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect villages, towns and cities. It is a natural, service-providing infrastructure that is often more cost-effective, more resilient and more capable of meeting social, environmental and economic objectives than 'grey' infrastructure".

Requirement for Green Infrastructure Statements

- 1.5. Following publication of the letter prepared by Julie James AS/MS, Minister for Climate Change, in October 2023, Planning Policy Wales (PPW) 12 (February 2024) has been updated to reflect the greater emphasis which is being placed on the planning system to ensure that it protects and enhances the natural environment. One of the key changes

¹ 'Green Infrastructure: An Integrated Approach to Land Use - Position Statement (2013 Landscape Institute)'

brought forward through the updated PPW is the requirement that, “A green infrastructure statement should be submitted with all planning applications”.

- 1.6. PPW 12 explains that the purpose of Green Infrastructure Statements (GISs) are to describe how green infrastructure has been incorporated into the proposals. The document also details that the level and extent of information that should be included within a GIS should be proportional to the scale and nature of the proposed development.
- 1.7. The document states that when preparing GISs for a minor development, such as GCRE Ltd.’s proposals to replace an existing road bridge, that the documents should, “be a short description and should not be an onerous requirement for applicants”. However, despite the limited scale of the proposed development, the Applicant seeks to robustly demonstrate that the project will deliver net benefits to biodiversity, enhance the site’s natural environment and evidence application of the ‘step-wise’ approach.
- 1.8. The step-wise approach is a way of demonstrating that a proposed development has been designed in such a manner that net benefits for biodiversity will be realised in a sustainable manner, through its construction. If, through application of the step-wise approach, net benefits cannot be demonstrated, the planning application for the proposed development will be refused. An extract from PPW 12, depicting the step-wise approach in a diagrammatic format, is shown in Figure 1, below.

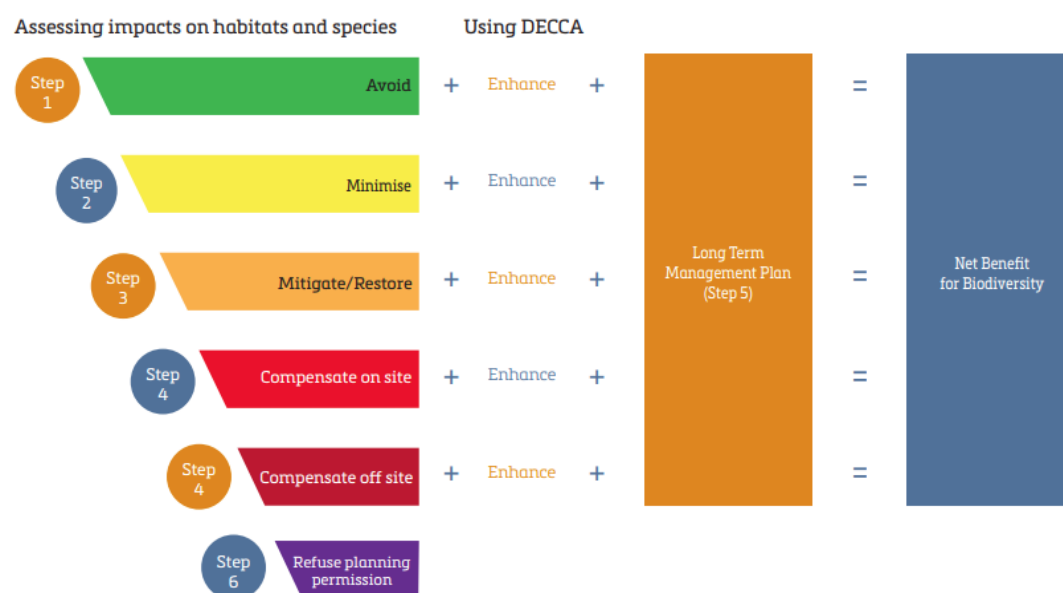


Figure 1- Summary of the Stepwise Approach²

² Extract from PPW 12.

2.0 Green Infrastructure Assessment

- 2.1 This section of the GIS will assess the likely impacts of the proposals to existing green infrastructure features and discusses which features are being incorporated into the design of the proposals to achieve net benefits for biodiversity.
- 2.2 Fairhurst's GIS assessment of impact has been informed by the findings of the documents, reports and plans that support the planning application. Specifically, the documents listed in Table 1, below, directly relate to the site's existing and proposed green infrastructure.

Document	Author	Reference/Drawing No.
Ecological Impact Assessment	Wildwood	WWE23159
Bat Survey Report	BSG Ecology	P22-218 – 2022/23
Arboricultural Report	Sylvan Ecology	J0228 V2.4
Proposed Soft Landscape Plan	JCLA	OW181-JCLA-DR-L-0001 Rev P01

Table 1: Summary of Green Infrastructure documents

Existing Site Context

- 2.3 As recognised within the Planning Statement, submitted in support of the proposed development, the site is not contained within, nor is it located in the immediate proximity of any statutory ecological designations. Furthermore, the site is not contained within or located in the immediate proximity of any non-statutory ecological sites.
- 2.4 The application site contains Clergyman's bridge (Pont y Offeiriad), which is located within the span of Onllwyn Road; Onllwyn Road; a railway track; and embankments/associated areas adjacent to the highway/bridge containing shrubbery, trees and grassland. The development site lies north of the A4109 and is located approximately 250m to the north west of Onllwyn village. The north-west section of the site comprises of a small mixed woodland area consisting mainly of sycamore trees, with the remainder consisting of areas of grassland with scattered trees, shrubs and scrub. There is also an existing watercourse which runs through the south-west and south-east portions of the site which eventually drains into the Dulais.

Proposed Green Infrastructure

- 2.5 The proposed development seeks to redevelop an existing bridge. Any impacts to the site's existing green infrastructure to facilitate the proposed development will be mitigated and on-site enhancement will be realised through the provision of tree planting and habitat creation.

- 2.6 The planning application for the replacement bridge is supported by Ecological Impact Assessment (EclA) which describes the specific mitigation measures to be employed as part of the site's construction and the extent of enhancements which be realised once the proposed landscaping is established. These enhancements include the planting of 29no. new trees, the creation of rain garden SuDS features; and the delivery of wet meadow flora, coal seam and open mosaic habitats. These elements have been specifically incorporated into the design to ensure that the development realises net benefits to biodiversity, whilst at the same time, enhancing the site's Green Infrastructure. The site's existing condition and what changes are posed to its landscaping and green infrastructure can most readily be viewed when contrasting the 'Existing Plan' (**Drg No. GCREB1-5TH-XX-XX-DR-A-0701 P01**) against the 'Proposed Soft Landscape Plan' (**Drg No. OW181-JCLA-DR-L-0001-P01**).

Step-Wise Assessment

- 2.7 In accordance with PPW 12, Fairhurst have utilised the step-wise methodology to assess the development's impact on green infrastructure. The 6no. steps detailed within Figure 1 of this document, form the basis of this assessment, to demonstrate that the proposals adhere to the step-wise principles.

1. Avoid

PPW 12 details that, *"The first priority for planning authorities is to avoid damage to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning. Where there may be harmful environmental effects, planning authorities will need to be satisfied that any reasonable alternative sites (including alternative siting and design options) that would result in less harm, no harm or benefit have been fully considered"*.

The proposed development has been designed to avoid any environmental impacts that may be realised through its construction. However, due to the nature of the proposals it has been necessary for Tree Groups G1-G3 and T1 to be removed. The proposed development is primarily required to ensure that railway rolling stock can travel underneath the northern most bridge contained within the span of Onllwyn Road. Accordingly, the development cannot be located elsewhere. PPW also goes on to state that:

"Proposals in statutory designated sites are, as a matter of principle, unacceptable and therefore must be excluded from site searches undertaken by developers. This principle also extends to those sites containing protected species and habitats which are irreplaceable and must be safeguarded. Such sites form the heart of resilient ecological networks and their role and the ecosystem services they provide must be protected, maintained and enhanced and safeguarded from development. It will be wholly exceptional for development to be justifiable in such instances".

The proposed development is not located within or contained in the immediate proximity of any statutory or non-statutory ecological designations. Furthermore, as recognised by the submitted ecological and arboricultural documents, the proposed development does not contain irreplaceable habitats.

2. Minimise

PPW 12 recognises that, *“When all locational, siting and design options for avoiding damage to biodiversity have been exhausted, applicants, in discussion with planning authorities, must seek to minimise the initial impact on biodiversity and ecosystems by:*

- *maintaining the largest possible area of existing habitat supporting biodiversity and functioning ecosystems, particularly Section 7 habitats and species where present, by minimising development size and appropriate orientation on site, paying due regard to the potential for continued long term maintenance and management of retained areas to benefit biodiversity;*
- *ensuring that retained habitats continue to be well connected to adjacent habitats to provide connectivity for key species and ensuring that the favourable conservation status of local species populations is maintained;*
- *retaining existing features, develop a management plan for their future care (e.g., trees, hedgerows, species rich grasslands, heath, wetlands, ponds and freshwater habitats) and use appropriate buffers to protect these from construction and operational impacts; and*
- *using proven innovative/creative solutions (where required) to minimise damage and maintain existing biodiversity features and ecosystems in tandem with robust monitoring and rectification strategies.*

The Applicant has sought to ensure that the proposals integrate within their environment and emphasis has been placed on retaining habitats/features where possible. Furthermore, the replacement bridge and associated works have been designed to be as minimal as possible whilst ensuring that the development is fit for purpose. Specifically, the changes to the embankments and road levels are required to facilitate the movement of railway stock beneath the bridge. The design of the bridge deck itself has been developed in collaboration with NPTCBC to ensure that two-way vehicular movements could be achieved and that additional space could be included which could be utilised as an active travel corridor in the future. No development is proposed as part of the application which is not required to achieve these fundamental aims.

3. Mitigate/Restore

PPW 12 outlines that, *“Where, after measures to minimise impact, biodiversity and ecosystems could still be damaged, or lost through residual impacts, the proposed development should mitigate that damage. Mitigation measures must be put in place to limit the negative effects of a development”*.

“Effective mitigation or restoration measures should be incorporated into the design proposal following the consideration of steps one and two above. Mitigation or restoration measures must be designed to address the specific negative effects by repairing damaged habitats and disturbed species. They should seek to restore in excess of like for like, accounting for disturbance and time lags for the recovery of habitat and species, and in every case, mitigation or restoration measures should seek to build ecosystem resilience within the site and where possible the wider area. In some circumstances, where like for like mitigation measures are not possible, particularly in respect of restoration measures, it may be necessary to consider on site compensation measures in the first instance. In designing mitigation measures where uncertainty exists, applicants should follow the precautionary principle and assume a significant effect. Off-site compensation measures (as set out in step four below) should be considered as a last resort”.

The proposed development will necessitate the loss of Tree Groups G1-G3 and T1, which are recognised as Category C trees. The extent and location of these trees are depicted within viewing the Tree Constraints Plan contained within the submitted Arboricultural Report. The submitted EcIA also recognises that the proposals will entail the removal of semi-improved grassland and potential nesting sites for Sand Martins. However, the submitted Proposed Soft Landscape Plan seeks to deliver 29no. new trees, the creation of rain garden SuDS features; and wet meadow flora, coal seam and open mosaic habitats. In light of these measures, the EcIA details finds that the proposals will, *“adequately mitigate, compensate, and enhance the protected, priority and notable habitats and species within and adjacent to the site”*.

4. Compensate on Site

PPW 12 details that, as part of Step 4 of the Step-Wise Approach, *“In some circumstances, where like for like mitigation measures are not possible, particularly in respect of restoration measures, it may be necessary to consider on site compensation measures in the first instance. In designing mitigation*

measures where uncertainty exists, applicants should follow the precautionary principle and assume a significant effect”.

As detailed within section 4 of this Step-Wise Assessment, compensation and enhancement measures are to be delivered within the site to ensure that the development not only integrates but delivers net benefits to ecology/green infrastructure.

5. Compensate off Site

PPW 12 recognises that, *“When all the steps above have been exhausted, and where modifications, alternative sites, conditions or obligations are not sufficient to secure biodiversity outcomes further on-site/immediately proximate, as a last resort off-site compensation for unavoidable damage must be provided. This must be of significant magnitude to fully compensate for any loss”.*

The proposed development will not require any offsite compensation given the extent of mitigation, compensation and enhancement measures which are to be delivered/accommodated within the proposed site.

3.0 Conclusion

- 3.1 The proposal has been designed to ensure that impacts to existing ecology and green infrastructure are minimised and that where impacts are necessary to facilitate the construction of the proposed development, these are sufficiently mitigated and compensated for through the incorporation of enhancement measures.
- 3.2 A Step-Wise Assessment has been completed and is contained within Chapter 2 of this document. This assessment, in tandem with the documents that support the application, demonstrate that the proposed development will deliver net benefits to ecology and will significantly enhance the site's green infrastructure provision. This is to be achieved through the implementation of a landscape design developed by JCLA which considers both the historical and ecological context of the site. Specifically, the landscaping plan celebrates the site's industrial legacy, integrating features such as coal seam and open mosaic habitat to deliver green infrastructure and net gains to ecology in a considered manner.
- 3.3 It is therefore considered that this document suitably demonstrates how green infrastructure has been incorporated into the proposed development. In this respect, the proposed development accords with the provisions contained within Chapter 6 of Planning Policy Wales 12; in addition to the contents of Future Wales 2040; Technical Advice Notes; Building Better Places (2020); the Active Travel Act (2013); The Well-being of Future Generations Act (2015); the Local Development plan for NPTCBC (2016); NPTCBC's Biodiversity and Geodiversity SPG (2018).