

Appendix 1: Green Infrastructure Statement

1. As part of the pre-application advice process, Neath and Port Talbot County Borough Council (NPTCBC) advised, consistent with Planning Policy Wales (PPW) 12, that the planning application should be supported by a Green Infrastructure Statement - GIS (refer to Appendix B to the Planning Statement).
2. PPW and the pre-application advice both explicitly state the GIS will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. PPW goes on to describe that the GIS should 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. Further, that there are multiple ways of incorporating green infrastructure, depending on the needs and opportunities a site presents.
3. In terms of 'green infrastructure', the development proposal itself is fundamentally driven by environmental legislation and policy targeted at combatting climate change with all of the associated environmental and ecological benefits that would ensue from delivering net zero.
4. In short, the new biomass boiler would displace the emission of circa 11,000 tonnes of fossil fuel derived CO₂ equivalent per annum. This represents a significant and tangible environmental benefit.
5. Further, as the Preliminary Ecological Appraisal (PEA) and EcIA set out:
 - a. The development has been sited and designed to avoid direct damage to any habit and biodiversity in its widest sense. It is entirely contained on a long established area of permanent hardstanding adjacent to the existing paper mill.
 - b. All surrounding habitats are retained and continue to be connected as at present.
6. In terms of off-site effects from aerial emissions, the Ecological Impact Assessment (EcIA) report and Air Quality Assessment only identify one relevant statutory designated site, Crymlyn Burrows SSSI. The air quality impacts predicted on the SSSI can be regarded as inconsequential, being well below screening thresholds. This conclusion is based on precautionary assumptions, including the presence of the most sensitive notified features at the point of maximum impact, and the operation of the biomass boiler in combination with the gas-fired boiler it is essentially designed to replace. There is therefore no risk of damage to the SSSI as a consequence of the proposed development.
7. The EcIA, AQA and Noise Assessment do not predict any significant effects on locally designated Sites of Importance for Nature Conservation (SINCs). This conclusion is also

based on precautionary assumptions, including operation of the biomass boiler in conjunction with the gas-fired boiler, and presence of noise-sensitive bird species at the nearest boundary of Baglan Bay SINCC.

8. Notwithstanding this conclusion, the Applicant proposes to install 2no. pole-mounted barn owl boxes on the western boundary of the paper mill site, in order to provide day roosting and possible breeding locations for this species (see Figure A1 overleaf for location). Although barn owls are not a qualifying feature of the SINCC, there are records in the wider Port Talbot and Briton Ferry area¹, and habitat suitability is high. They frequently occur in similar coastal locations to short-eared owl, although short-eared owls are more diurnal in habit, and seasonal in occurrence.
9. The owl box location adjoins an extensive area of open coastal habitats, which provides high quality foraging habitat, but have few opportunities for shelter or suitable breeding sites. The proposed location is 1.1km from the M4, outside the minimum 1km distance from major roads recommended for owl boxes by the Barn Owl Trust, and separated from the motorway by industrial development. There is therefore little risk to barn owls by attracting them into this area.
10. A specification for the owl boxes is given below, although it is anticipated that their detailed design and installation would be subject to a planning condition. Owl boxes should conform to Barn Owl Trust² or comparable specification, and be mounted on top of a 6m x 150mm diameter pole, 4.5m above ground with 1.5m buried below ground (see example photograph overleaf).
11. The owl boxes would increase the potential biodiversity interest of the wider Sofidel site. As such, they will deliver an on-site biodiversity gain, which coupled with the significant reduction in fossil fuel derived greenhouse gas emissions, is a positive multi-functional outcome.
12. Based on the foregoing, it is concluded that the proposal would deliver green infrastructure and demonstrably follows the step-wise approach.

¹ eBird: <https://ebird.org/map/brnowl?env.minX=-179.99999999291&env.minY=-62.771325856409&env.maxX=179.99999999291&env.maxY=61.6817322059907>
NBN Atlas: <https://species.nbnatlas.org/species/NHMSYS0000530685>

² <https://www.barnowltrust.org.uk/barn-owl-nestbox/barn-owl-pole-nest-box/#pole-box-criteria>



Pole-mounted nest box (Barn Owl Trust design)

