

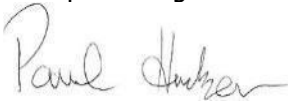


**2, 4 & 6 Windsor Road
Neath, SA11 1DA**

Green Infrastructure Statement

July 2024

DOCUMENT CONTROL

2,4 & 6 Windsor Road, Neath, SA11 1DA Green Infrastructure Statement				
Revision	Date	Prepared by	Checked by	Approved by
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1. Introduction

1.1. Background to Green Infrastructure

Planning Policy Wales defines green infrastructure as:

"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. At the landscape scale green infrastructure can comprise entire ecosystems such as wetlands, waterways and mountain ranges. At a local scale, it might comprise parks, fields, public rights of way, allotments, cemeteries, and gardens. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks¹."

There has recently been an update regarding the National Planning Policy for Chapter 6 of Planning Policy Wales² version 11. In addition, Planning Policy Wales version 12 was published in February 2024. A green infrastructure statement must now be submitted with all planning applications. It must describe how green infrastructure has been incorporated into the development proposals.

1.2. Green Infrastructure Assessment

The aim of a Green Infrastructure Assessment (GIA) is to ensure that all elements of GI are coordinated from the outset, so that biodiversity, trees, soils, landscaping, SuDS, amenity, access, recreation and climate change mitigation and adaptation are integrated into a scheme which delivers multiple benefits. Ideally a GIA should be a strategy which informs the design and layout of a scheme, rather than retrospectively explaining how it might work.

1.3. Background to Proposed Development

The development proposal involves the upward extension to the existing two storey commercial building. This will provide an additional floor level for three residential units as well as a ground floor cycle and refuse store. The site is situated in Neath Town Centre and receives commercial use, with retail and food service space occupying the shopfronts facing out onto Windsor Road. There are no existing trees, hedges or green infrastructure on the proposed development site nor on the land adjacent to the proposed development site except for a small grass burial ground attached to the chapel at the northern boundary. Therefore, due to the limited ecological value of the site there will be minimal net biodiversity loss. Instead, the proposed development represents an opportunity to create new green infrastructure within the surrounding urban landscape.

¹https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/6565ccf1517d747aa68af45c/1701170419121/Briefing_Paper_BwN_and_Planning_Policy_in_Wales_v1.0.pdf

The Initial pre-application was submitted to Neath Port Talbot Council in October 2023 (Ref: Q2023/0172) and a follow-up pre-application was submitted in April 2024 (Ref: Q2023/0248).

1.4. Green Infrastructure Proposed on Site

The landscaping plans for the above site have been reviewed in relation to the recently revised Green Infrastructure requirements and existing proposals are included within Appendix 1. Within the proposed development green infrastructure will be incorporated by establishing hedge plants, plant boxes and bird and bat boxes around the site as well as a wildflower rooftop above the new cycle and refuse stores. Due to the low ecological value of the site, the proposed green infrastructure features of the development will create new areas of wildlife refuge within the urban landscape of Neath Town Centre and will therefore improve the ecological value of the site.

The cycle and refuse store will feature new permeable paving and a wildflower green roof which will support sustainable drainage by minimising surface water discharge and reducing the impact on urban sewer flooding. The wildflower green roof will increase on site biodiversity by providing habitat and foraging opportunities to encourage and support invertebrate communities, particularly pollinators, which will aid in the maintenance of a healthy ecosystem while also serving as an important food source for bats, birds and other wildlife. Invertebrate populations will also be encouraged by the herbaceous plant boxes and evergreen hedge plants which will be established on site. Hedge plants are proposed along portions of the western and northern boundary of the cycle and refuse store; while plant boxes are proposed outside the eastern facing first floor windows and around each of the second-floor terraces.

The evergreen hedge plants will provide a living boundary of year-round foliage for the cycle and refuse area, enhancing the onsite ecosystem services in addition to other benefits like carbon sequestration and air pollutant capture which will improve the on-site air quality. Nectar rich species such as honeysuckle (*Lonicera spp.*) will attract pollinating moths and new shoots will attract blackfly, in turn these invertebrates will attract predators such as bats, blue tits, lacewings and ladybirds supporting a greater on-site assemblage of insects, birds and mammals. Further species for the plant boxes such as rosemary (*Rosmarinus officinalis*) may also attract pollinators such as bees, butterflies and hoverflies to the site. The inclusion of nectar rich and pollinator attractive plants will attract more diverse assemblages of insects, birds and mammals due to the increased food and refugia availability on site which will be an important boost to biodiversity in the surrounding urban landscape.

Bird and bat boxes are proposed to be installed on the southern and western elevation of the first floor and the western and northern elevations of the proposed second floor. In addition to the newly created foraging opportunities on site, these boxes will directly enhance the suitability of the site for a range of bird and bat species by providing new nesting and roosting opportunities.

2. Building with Nature Standards Framework

The development has also met several of the green infrastructure standards as outlined in the Building with Nature Standards Framework². The Building with Nature Standards Framework involves twelve Standards, arranged across four groups. There are six Core Standards and three themes, Wellbeing, Water and Wildlife, containing two Standards in each. The six Core Standards create a solid foundation for the delivery of high-quality green infrastructure through design, planning and development.

2.1. Core Standards

The core standards are detailed below: together with details of how they are being met on site.

Standard 1: Optimise Multifunctionality and Connectivity – The green infrastructure incorporated within the new development proposals optimises multifunctionality and connectivity within the boundary of the project and links with existing and planned for green infrastructure in the surrounding area. The location of the site in an urban setting leaves a lack of suitable green infrastructure in the surrounding landscape; except for a small grass burial plot bordering the western edge of the site which will be linked through the proposed evergreen hedge plants.

Standard 2: Positively Responds to the Climate Emergency – The green infrastructure is designed to be climate resilient by incorporating mitigation and adaptations that respond to the impacts of climate change. This has been met by the creation of hedges and plant boxes around the site as described in Section 1.4. The species listed in the landscape plan in Appendix 1 are hardy, low maintenance, fast growing and will not take long to begin capturing carbon and therefore will be important for supporting biodiversity in times of challenging temperatures.

Standard 3: Maximises Environmental Net Gain – The green infrastructure is designed to actively mitigate any unavoidable harmful environmental impacts of development on soil and air quality and to minimise light and noise pollution. The development meets this by establishing hedges and plant boxes which in turn will provide shade and evapotranspiration to help reduce day-time temperatures.

Standard 4: Champions a Context Driven Approach - Not considered relevant for this site. We are not aware of any stakeholder feedback informing the green infrastructure layout, features and design.

Standard 5: Creates Distinctive Places – The green infrastructure is integral to the project and is designed to reinforce local distinctiveness and/or create a distinctive sense of place. Currently, the site has very limited habitats and therefore has low ecological value, due to the entire site comprising a commercial building. Therefore, the new proposals will increase the sites quality and distinctiveness by the creation of new plant boxes, evergreen hedge plants, bird and bat boxes and a wildflower rooftop as described in 1.4 which together will make good placemaking communities and the natural environment.

²https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/6351513d1afee236d4cf6ce8/1666273600232/Building_with_Nature_Standards_Framework_2.0_Oct22_Download_Version.pdf

Standard 6: Secures Effective Place-keeping – The proposed species are hardy and low maintenance, and the existing landscape plan (Appendix 1) proposes monthly maintenance visits (1-2 years) to be carried out at least monthly from April to September and twice during the dormant seasons in order to establish a healthy community of plants. Plant boxes will be maintained by the residents, which will encourage on site gardening.

Standard 7: Brings Nature Closer to People – The development's green infrastructure is available and accessible to all and optimises their use and enjoyment. The development incorporates soft features (see Appendix 1) which in turn creates a welcoming and safe environment for all.

Standard 8: Supports Equitable and Inclusive Places – The green infrastructure is designed to encourage and enable everyone, including those from vulnerable or excluded groups, to use and enjoy it, to help reduce health inequalities and to build a shared sense of community and belonging. The development meets this standard as it will provide associated infrastructure for all residents such as a bike store and plant boxes which support accessibility for all.

Standard 9: Delivers Climate Resilient Water Management – The site is fully urbanised and there is limited scope within the development to incorporate above ground features to manage flood risk, maintain the natural water cycle and improve the quality within the boundary of the project. However, where possible SuDS has been included with the addition of permeable paving to the cycle and refuse store area with a wildflower roof. This nature-based solution approach to water management delivers multiple benefits including introducing a greater diversity of habitats and greater resiliency to extreme weather events and is appropriate given the context of the site.

Standard 10: Brings Water Closer to People – The proposals incorporate SuDS into the development design as described in 1.4, however, the development proposals does not include any additional blue infrastructure design due to the absence of waterbodies within the site boundary because of its entirely urban nature, therefore this principle cannot be met.

Standard 11: Delivers Wildlife Enhancement – The green infrastructure optimises long-term and climate-resilient net benefits for nature, by establishing ecological assets such as a wildflower roof top, evergreen hedge plants and plant boxes around the site and creating locally relevant new habitats within the boundary of the project through the installation of bird and bat boxes. This in turn will support the conservation status of priority species and habitats and delivers positive benefits for wildlife, within and beyond the boundary (and life) of the development. However, many of the plant species proposed for the hedge plants and plant boxes in the landscape plan (Appendix 1) are non-native species and where possible native shrub species should be prioritised to deliver the greatest benefits for local biodiversity. Examples of native wildflower species which could be considered are included in Appendix 3.

Standard 12: Underpins Nature's Recovery – The site and surrounding area are fully urbanised, and this absence of green infrastructure provides limited scope within the development to create effective links with any wider source of nature. Instead, the green infrastructure proposed in the development will

establish important wildlife features to support the recovery of nature within the urban landscape of Neath Town Centre. This will help to establish and encourage a future network of green infrastructure across the urban landscape of the town centre and support the local recovery of nature.

2.2. Summary of Development and How it Meets the Core Standards

Overall, the development meets the majority of the core standards within the Building with Nature Standards Framework.

2.3. Summary of How Stepwise Approach has been Followed

The table below sets out the stepwise approach taken in assessing impacts of a development on habitats and the species.

	Steps	Assessment	Enhancement	Long term Maintenance	Net Benefits
1	Avoid	The proposed development will be constructed over areas of hard landscaping and there will be negligible damage to biodiversity and as such accords with the stepwise approach set out in the published advice	Bird & Bat boxes, plant boxes, hedge plants and wildflower rooftop to be installed SuDS features	1-2 years of monthly maintenance as described in the landscape plan (Appendix 1)	Yes
2	Minimise	N/A	N/A	N/A	N/A
3	Mitigation/restore	N/A	N/A	N/A	N/A
4	Compensate on site	N/A	N/A	N/A	N/A
5	Compensate off site	N/A	N/A	N/A	N/A

2.4. Summary of Development and How it Results in Net Biodiversity Benefits

Overall, the proposal will result in an ecological enhancement and biodiversity net gain for biodiversity as a result of the development. This will be undertaken by integrating such green infrastructure into the development proposals. The development will avoid any damage to biodiversity and provides an ecological enhancement proportionate to the scale of the development. Ecosystems within and adjacent to the site, ensuring that they continue to support diverse habitats and species, allowing them to adapt to change. The plans will also enhance the green infrastructure on site in a way that increases resilience to the changing climate and provide protection for people and places.

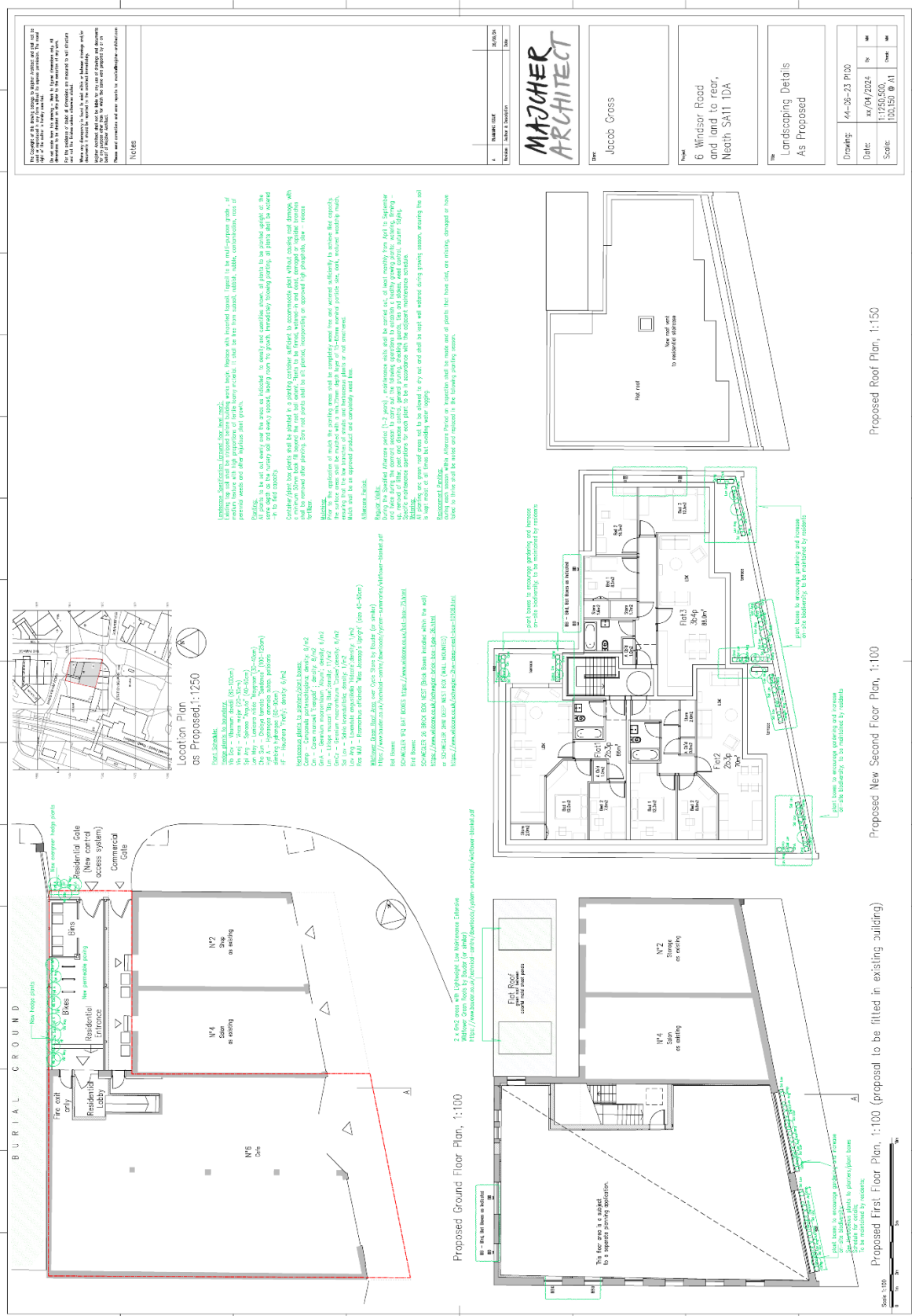
3. References

Building with Nature (2023) *Delivering High Quality Green Infrastructure In Wales*. Available at: https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/6565ccf1517d747aa68af45c/1701170419121/Briefing_Paper_BwN_and_Planning_Policy_in_Wales_v1.0.pdf

Building with Nature Standards Framework (2023) Available at: https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/6351513d1afee236d4cf6ce8/1666273600232/Building_with_Nature_Standards_Framework_2.0_Oct22_Download_Version.pdf

Planning Policy Wales (2024) Available online at https://www.gov.wales/sites/default/files/publications/2024-02/planning-policy-wales-edition-12_1.pdf

Appendix 1: Proposed Landscaping Plan



Appendix 2: Background to Requirements for Green Infrastructure Assessments

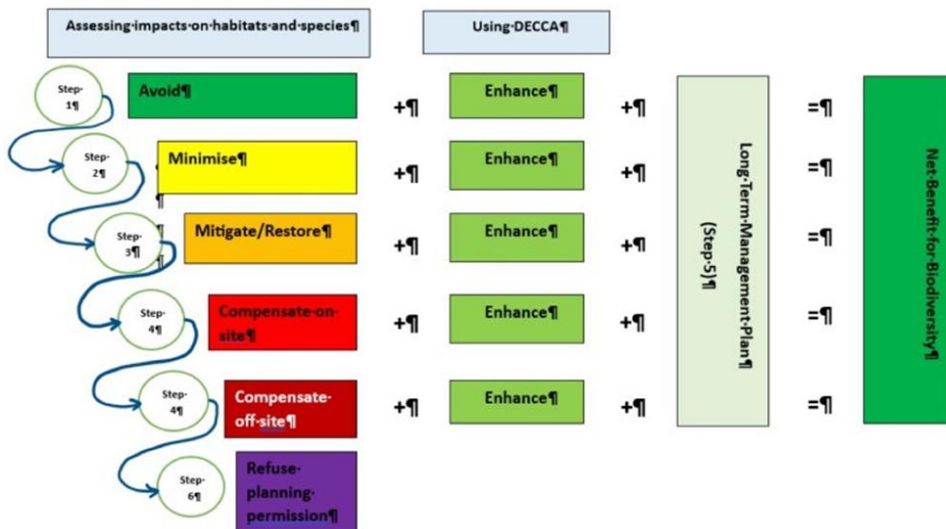
Background

On 11th October 2023 the Welsh Government issued updated National Planning Policy for chapter 6 of Planning Policy Wales. This was followed by the publication of Planning Policy Wales version 12 in February 2024.

The updated policy guidance recognises the value of green infrastructure within the built environment. In order to facilitate a quality-built environment enhanced by integrated green infrastructure all planning applications must now include a green infrastructure statement.

"6.2.6 A green infrastructure statement should be submitted with all planning applications. This will 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 (Paragraph 6.4.21) has been applied."

Figure 1 below sets out the summary of the stepwise approach as set out in the Annex to the published advice.



Appendix 3: Wildlife Friendly Plants Recommended for Urban Areas

Species chosen are robust and hardy, low growing and require only low maintenance

In green are native species and in black are non-native species

Woody Species

Aenome clematis (*Clematis Montana*)
 Birmingham Photinia (*Photinia fraseri*)
 Broad-leaved Cockspur Thorn (*Crataegus prunifolia*)
 Cherry Laurel (*Prunus Laurocerasus* 'Cherry Brandy')
 Climbing Hydrangea (*Hydrangea petiolaris*)
 Common hawthorn (*Crataegus monogyna*)
 Compact Laurel Hedge (*Prunus laurocerasus* 'otto luyken')
 'Daydawn' Shrubby cinquefoil (*Potentilla fruticosa* 'Daydawn')
 Dogwood (*Cornus sanguineus*)
 Donards seedling (*Escallonia* 'Donards Seedling')
 Escallonia (*Escallonia ivelyi*)
 Field maple (*Acer campestre*)
 Firehill Russian Almond (*Prunus tenella* 'Fire Hill')
 Flowering Cherry (*Prunus* 'Snow Goose')
 Honeysuckle 'Maigreen' (*Lonicera nitida* 'Maigreen')
 Japanese skimmia (*Skimmia japonica* 'Rubella')
 Lebanese wild apple (*Malus trilobata*)
 Lesser periwinkle 'Bowles' Variety (*Vinca minor* "Bowles Blue")
 Meidomonac' Rose (*Rosa Bonica*)
 Mexican orange blossom (*Choisya ternate*)
 Mugo pine (*Pinus mugo*)
 Osmarea Burkwoodii (*Osmanthus* x *Osmarea burkwoodii*)
 Red flowered Escallonia (*Escallonia macrantha*)
 Rock rose (*Cistus corbariensis*)
 Rowan (*Sorbus aucuparia*)
 Shrubby Veronica 'Emerald Green' (*Hebe* 'Emerald Green')
 Silver bush (*Convolvulus cneorum*)
 Snowy mespilus (*Amelanchier lamarckii*)
 Spindle 'Emerald n Gold' (*Euonymus Emerald n Gold*)
 Spindle 'Emerald Gaiety' (*Euonymus fortunei*)

Herbs and Ferns

Bluebell (*Hyacinthoides non-scripta*)
 Daffodil Minnow (*Narcissus* 'Minnow')
 Hart's Tongue-Fern (*Phyllitis scolopendrium*)
 Holly 'Golden von Tal' (*Ilex aquifolium*)
 Ivy (*Hedera helix*)
 Ivy 'Green ripple' (*Hedera helix* 'Green Ripple')
 Ivy 'Goldheart' (*Hedera helix* 'Goldheart')
 Large-cupped Daffodil (*Narcissus* 'Carlton')
 Miniature daffodil (*Narcissus* 'Tete-a-Tete')
 Snowdrop (*Galanthus nivalis*)