

Baglan Way, Port Talbot

Green Infrastructure Statement

edp7017_r010a

QA: DLe/JHa_MWI/CRo_031024

1 INTRODUCTION

1.1 This Green Infrastructure Statement has been prepared by the Environmental Dimension Partnership Ltd (EDP) in respect of land at Baglan Way, Port Talbot (hereafter referred to as 'the site'). The report has been prepared on behalf of Cumming Group (hereafter referred to as 'the client') to inform and support their planning application for the addition of a canopy over the goods-out area to their previously consented factory site, which is currently under construction. This report considers these proposals and their potential effects on Green Infrastructure and biodiversity.

1.2 EDP is a multi-disciplinary environmental consultancy with specialists in the areas of landscape, biodiversity, arboriculture, heritage and urban design. This mix of skill sets and extensive experience in the development sector in Wales, from their base in Cardiff, makes EDP perfectly positioned to provide the assessment of effects on Green Infrastructure, which PPW seeks.

1.3 Planning Policy Wales (PPW) defines Green Infrastructure as:

"...the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places."

1.4 PPW edition 12, published in February 2024, requires that all planning applications are supported with a Green Infrastructure Statement. Paragraph 6.2.12 states:

"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 6.4.15) has been applied".

1.5 At 6.4.12, PPW further states:

"Having worked iteratively, in line with Figure 12, through the stages of the step-wise approach below, and providing evidence in the Green Infrastructure Statement that the

step-wise approach has been followed, a scheme of enhancements must be provided to ensure a net benefit for biodiversity.

Where biodiversity enhancement proportionate to the scale and nature of the development is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise, it will be necessary to refuse permission”.

1.6 Additionally, of relevance to this specific application, PPW states at 6.4.16 (bullet 3) that:

“All development must deliver a net benefit for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed). Even if the biodiversity value has been maintained, there must still be a pro-active process to look for and secure enhancement through the design and implementation of the development”.

Planning Background

1.7 The site currently comprises a construction site, delivering the consented 25,545m² industrial unit (Class B2) for which the client achieved consent in October 2022 (Application ref: P2022/0470).

1.8 The client is now seeking additional planning consent to add a canopy over the goods-outwards area, due to the need to protect freshly manufactured/processed glass from the weather (rain in particular) during the loading process. Given the scale of the canopy (approximately 6m wide and extending along the width of the building’s north-western elevation) the client has been advised to prepare a stand-alone application for this element.

1.9 As this will be a new planning application, the revised requirements of PPW in respect of Green Infrastructure Statements and delivery of Net Benefit for Biodiversity now apply to this application.

1.10 Given the above, this report seeks to:

- Summarise the baseline position in respect of the Site. This will reflect the Green Infrastructure assets present, their condition and their functionality in respect of Ecosystem Services;
- Summarise the baseline position in terms of the wider connectivity of the Site within the local/regional Green Infrastructure network and identify any specific or key roles which it fulfils in this regard;
- Describe the proposed development and any new Green Infrastructure to be integrated within it;
- Identify the effects of the development on Green Infrastructure assets and functionality and utilise the Step Wise approach to consider how mitigation has been applied and a net benefit for biodiversity achieved; and
- Summarise the overall effect on Green Infrastructure.

2 BASELINE GREEN INFRASTRUCTURE

- 2.1 The Site is located within the confines of the previously consented site area, lying at the north-western end of the proposed commercial building. The wider site lies wholly within the designated Site of Importance for Nature Conservation (SINC) known as 'Panasonic SINC' and that original commercial scheme was consented on the basis of a comprehensive package of biodiversity mitigation and significant landscape enhancements.
- 2.2 This current application for the proposed canopy is therefore now measured against the current Green Infrastructure baseline – not that which preceded the original application. This is appropriate given the consent in place.
- 2.3 On that basis, the baseline position with respect to Green Infrastructure and biodiversity is that there are no features of value within the current application site, which wholly comprises a concrete surfaced service yard for the manoeuvring of heavy goods vehicles to collect and deliver the glass products.
- 2.4 The site therefore has negligible Green Infrastructure or biodiversity value or functionality in its current form and none of the proposed mitigation for the consented application is impacted by the new proposals.

3 THE PROPOSED DEVELOPMENT

- 3.1 The proposed development for which consent is now sought comprises the addition of a canopy above the goods-out area to protect glass products from the effects of weather. The canopy proposals sit above the service yard area, connected to and suspended off the commercial building presently nearing completion.

4 DEVELOPMENT EFFECTS

- 4.1 PPW edition 12 requires a Step Wise approach to be taken to the mitigation of effects on biodiversity. This entails mitigation measures being employed in the following order:
1. Avoid – Development should seek to avoid valuable habitats and species wherever possible;
 2. Minimise – Where complete avoidance is not possible, development should seek to minimise the effects on identified habitats and species;
 3. Mitigate – Where impacts on biodiversity remain after Steps 1 and 2, mitigation should be provided to balance the harm and provide an overall biodiversity benefit;
 4. Compensate – Where adequate mitigation cannot be provided on the site, it may be possible to offset this as compensatory measures offsite. This should preferably be immediately adjacent; and
 5. Long Term Management – All Green Infrastructure, retained and proposed, needs to be subject to long-term management to ensure its value is delivered and maintained.

- 4.2 However, given the complete lack of Green Infrastructure or biodiversity value and functionality identified in the baseline there is no requirement to avoid such aspects or features, nor is any feature of value impacted by the proposals. There is likewise no requirement to minimise effects, nor to mitigate or compensate for any impacts.
- 4.3 As noted at paragraph 1.6, PPW does require that all development demonstrates a Net Benefit to Biodiversity and this includes proposals where the baseline position is devoid of value, such as this one. As such, enhancement is proposed as part of this application through the delivery of additional bat boxes attached to the structure of the adjacent building elevation. The locations of these have been agreed with an EDP ecologist and placed in appropriate positions, where lux levels are less than five. These details can be found within the elevational drawings accompanying this planning application.

Long Term Management

- 4.4 Given the minimal mitigation required, future management will be limited to the monitoring of the bat boxes for structural integrity etc. in line with proposed management on the wider site set out within the Biodiversity Management Plan for that development (report ref.: edp7017_r008). No other long-term management of Green Infrastructure is anticipated in relation to this current application.

5 SUMMARY AND CONCLUSIONS

- 5.1 This Green Infrastructure Statement seeks to fulfil the requirements of PPW, insofar as it provides the required description of how the Step Wise approach has been followed and Net Benefit for Biodiversity achieved.
- 5.2 The existing Green Infrastructure and biodiversity value of the site is considered to be negligible, given that it wholly comprises a concrete hardstanding adjacent to the existing commercial building, which is utilised for the manoeuvring of heavy goods vehicles and the loading of the finished glass products.
- 5.3 In light of this, the report has identified that there is no requirement for avoidance, minimisation, mitigation or compensation. Net Benefit to Biodiversity is, however, achievable through the installation of bat boxes on the adjacent building elevation, and details of these can be found within the elevational drawings, accompanying this planning application.
- 5.4 On this basis, the proposals are considered to fulfil the requirements of PPW in respect of the delivery of Net Benefit to Biodiversity and an overall positive outcome for Green Infrastructure.