

APPENDIX D

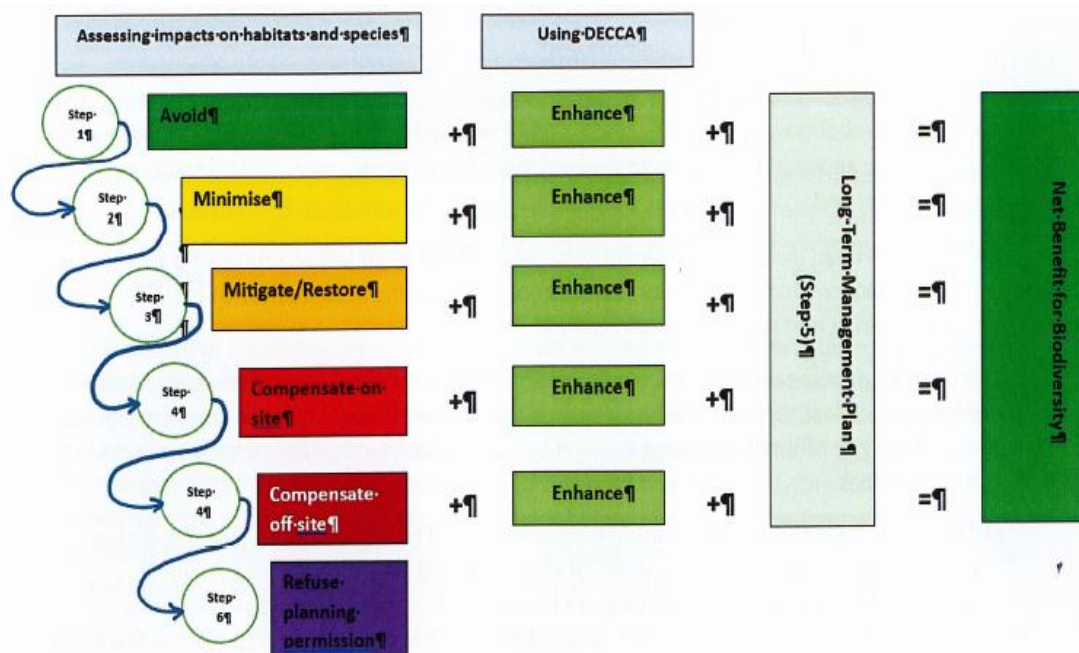
Green Infrastructure Statement

1.1 The area surrounding Church Street comprises of a mixture of terraced housing, industrial buildings that include a vehicle repair shop, a scrap metal facility, a fitness gym and an electrical wholesalers' facility. The application site was previously occupied by buildings used in connection with the railway and more recently as a compound for the storage of materials. When the applicant purchased the land, it was strewn with waste building materials, dumped rubbish and rubble covered in a mass of self-set saplings and shrubs with little or no ecological value. The applicant has cleared the site and raised ground levels to address the potential flood risk. At that time the site had limited ecological credentials being previously developed land surrounded by hard surfaces.

1.2 PPW Ed 12 requires the submission of a 'green infrastructure statement' as part of most planning applications. This advice came into effect on 18 October 2023. By that date the applicant had already undertaken considerable work to clear the site of waste materials and the overgrown, self-set shrubs and saplings. For this reason, it was impossible to undertake a Preliminary Ecological Assessment now required under section 6 PPW 2024. These works, therefore, predated this requirement.

1.3 On this particular issue advice under Planning Policy Wales (12) paragraph 6.4.16 states '*Potential applicants should not conduct any pre-emptive site clearance works before submitting a planning application as this can make it more difficult for a development proposal to secure a net benefit for biodiversity. Where a site has been cleared prior to development its biodiversity value should be deemed to have been as it was before any site investigations or clearance took place. A net benefit for biodiversity must be achieved from that point. Habitat status can be established through evidence remaining on site and local desk-based assessments (planning authorities must ensure that they have access to these data sources). In such cases, habitat status will be presumed to be good in the absence of any evidence to the contrary*'. Considering paragraph 1.1 above, this presumption is not correct or applicable as the site, as purchased, had no credible habitat or ecological credentials. The above advice cannot be applied retrospectively. The applicant is an experienced landscape gardener and is more than capable of carrying out the ecological improvements.

1.4 The aim of the statement is to enhance the Biodiversity and Resilience of the Ecosystems Duty.



***Note:** A stepwise approach has been undertaken to assess and secure net benefits for biodiversity via this proposed new development. Firstly, considering avoidance, minimising impact and then enhancement and long-term management on site. During this particular assessment off-site compensation measures were not considered to be needed and would, however, only be considered as a last resort.*

1.5 The overall intention is to enhance their Section 6 duty to maintain and enhance biodiversity as part of new development proposals. The changes in policy include the submission of a 'proportionate' green infrastructure statement; the need to consider biodiversity net gain, enhancement and long-term management at each step; promoting new planting as part of development based on 'securing the right tree in the right place.'

It is contended that County Borough Council's network of green infrastructure both new and existing is preserved and enhanced.

1.6 This Green Infrastructure Statement is supported by Drawing 02a (Proposed Overall Site Plan) which is considered appropriate and proportionate to the scale and type of development involved. This statement refers to the concept of the 'stepwise approach' to assessing impacts upon habitats and species (avoid – minimise – mitigate/restore – compensation – enhancement).

Modest Expansion Consideration: In line with the stepwise approach 'avoidance and minimisation' have been the first considerations. As such the proposal ensures minimal disturbance to the surrounding environment. Consideration will be given to the potential impact on local ecosystems, water usage, and waste management.

1.7 Proposed Enhancements / Biodiversity Net Benefits

The proposal is considered to comply with the broad principles set out in the new policy advice, as the following biodiversity net gains / ecological and landscaping enhancements are proposed:

- The proposal seeks to mitigate and remove any further waste materials and debris improving the visual appearance proposing a significant landscaping enhancement and details a scheme and schedule illustrated on Drawing 02a
- The proposal seeks to mitigate and improve tree / hedgerow provision by offering additional native species of trees and hedging along the perimeter of the site where possible and a lawned area to replace part of the gravelled area. Species are specified on Drawing 02a.
- The proposed biodiversity enhancements include the incorporation of bird and bat boxes within the overall development.
- A sustainable drainage system forms an integral part of the development with foul water drainage disposed via the adjacent public sewer with a non-return valve fitted and a sustainable urban drainage system will be installed to deal with surface water.

This Green Infrastructure Assessment aligns with the County Borough Council's commitment to sustainable development by integrating green infrastructure into the proposed scheme, the development aims to contribute positively to the local environment while providing a sustainable development in this high-density urban setting. Given time, the proposed infrastructure plan will result in a net gain in biodiversity, improving the visual and ecological credentials of the site.