

# 121 Heol-Cae-Gurwen, Gwaun-Cae-Gurwen, Ammanford, SA18 1PD

Proposed Demolition of Former Club and Development of a  
Tesco Express Store

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## 1. Introduction

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### Background

- 1.1. This Green Infrastructure Statement has been prepared in support of an application for Full Planning Permission, submitted on behalf of 'NMJ Property Holdings Limited' in relation to the following development proposal:

*"Proposed Demolition of Former Club and Development of a Tesco Express Store"*

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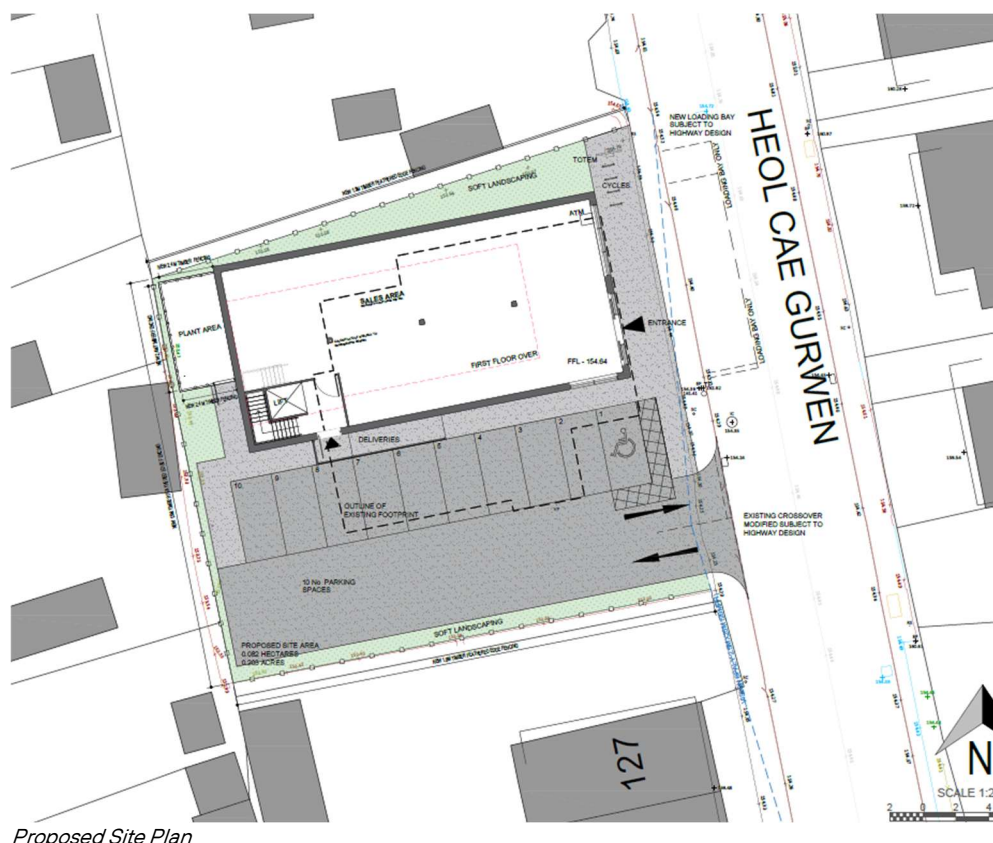
### Site Context

- 1.2. The proposed development site is located on Heol-Cae-Gurwen, the main thoroughfare through the established residential village of Gwaun-Cae-Gurwen. The site currently comprises a derelict former club building, with areas of overgrown vegetation to the rear.



*Aerial view of the site (approximate site location highlighted in red)*

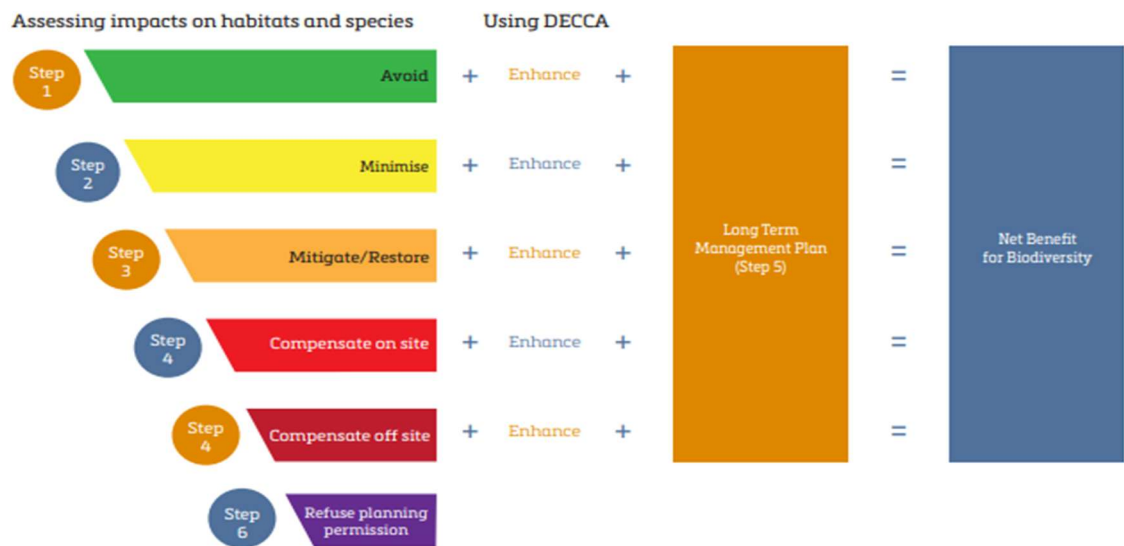
- 1.3. The proposed site plan can be seen below for reference:



Proposed Site Plan

## Policy

- 1.4. This Green Infrastructure Statement has been formulated in accordance with Chapter 6 of Planning Policy Wales (PPW 12). This states that it is now considered necessary for all planning applications to be supported by a Green Infrastructure Statement.
- 1.5. In short, the overall objective of the Green Infrastructure Statement is to ensure any disruption to biodiversity is kept to a minimum as a result of the development. The pertinent text has been extracted below from Chapter 6 of PPW 12:  
  
*"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 multifunctional outcomes which are appropriate to the site in question and must be used for demonstrating how the stepwise approach (Paragraph 6.4.15) has been applied".*
- 1.6. The Stepwise Approach for assessing and addressing the potential impact of development on habitats and species set out in PPW 12 (Figure 12) is extracted and summarised overleaf:



- 1.7. The Step-Wise Approach seeks to prioritise the protection of existing biodiversity, and to mitigate for any loss of biodiversity, to ensure that an overall net benefit is secured through any new development.
- 1.8. Paragraph 6.4.16 states: *'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).'*
- 1.9. Paragraph 6.4.42 goes on to state: *'Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost, and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost.'*
- 1.10. As such, this statement will outline the measures the proposal will take to ensure it is compliant with the policy position set out in PPW12

## 2. Ecology and Green Infrastructure Baseline

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### Background

- 2.1. First and foremost, it should be noted that a Bat Survey was previously undertaken on the site by Gould Ecology in 2022, in support of application ref. P2023/0586. For ease of reference, the key findings are set out below:
- No bat roosting activity was recorded within the building. Low numbers of pipistrelle species bats were recorded foraging in the vicinity, including occasional flights within the building (which contained multiple openings and was missing much of the roof to the rear).
  - The building and dense vegetation on the plot margins had potential suitability for nesting birds.
  - The plot generally had low or negligible suitability for protected species. There was a low risk of common lizard and hedgehog occurring within the plot.
  - Several small specimens of wall cotoneaster (a Schedule 9 invasive species) were noted within the plot.
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### Preliminary Ecological Appraisal

- 2.2. In order to re-establish the sites ecological baseline combination of a desk-based study, an Extended Phase 1 Habitat Survey / Daytime Bat Walkover was undertaken in May 2026 by Gould Ecology. The full report has been submitted alongside the application, and the key points to note are discussed below. It should also be noted that further bat survey (comprising 2 x dusk emergence survey visits), has been commissioned, with the reports scheduled to be received and submitted in due course.

- 2.3. For ease of reference, the key findings for the survey have been extracted below.

#### *Bats*

- 2.4. The report noted that the site is considered to have moderate suitability for bats – given the openings and potential roost features. It goes onto to state that the previous bat survey work at the site (2022) did not identify any roosts and recorded relatively low levels of bat activity.
- 2.5. It is then concluded that there would be a (low) risk of disturbing, killing or injuring bats during demolition works, and of destroying bat roosts. However, and as are currently underway, further surveys will be required to confirm this.

#### *Birds*

- 2.6. In terms of birds, the habitats present on site are considered to provide limited foraging opportunities for local species. However, it is recognised that the demolition of the building and the clearance of dense bramble and hedgerow vegetation has the potential to disturb nesting birds. Accordingly, and to avoid any such risk, all site clearance works will be undertaken outside of the recognised bird nesting season.

#### *Reptiles, Hedgehog and other fauna*

- 2.7. The report sets out that site clearance works are unlikely to result in significant harm to reptiles (e.g. common lizard), hedgehogs (a priority mammal species), or other fauna such as common frog. Given the generally low

ecological suitability of the site, any potential risks can be effectively avoided or minimised through the implementation of precautionary working methods. In the longer term, the incorporation of hedgerows or designated habitat areas along the site boundaries would enhance ecological value by providing connectivity, shelter, and foraging opportunities for local wildlife.

#### *Invasive Species*

- 2.8. As Japanese Knotweed and Wall Cotoneaster, (Schedule 9 invasive species) were both found on the site, site clearance could lead to the potential spread off site. However, this can and will be avoided by ensuring appropriate controls are implanted.

#### *Conclusion*

- 2.9. The report concludes that further survey work is required to determine whether bats are present at the site, recommending that 2 x dusk emergence survey are to be conducted in suitable weather conditions between May – September.

### 3. Green Infrastructure Strategy & Enhancement Measures

#### Green Infrastructure Statement

##### *Green Infrastructure*

- 3.1. In light of the step-wise approach, avoiding and minimising the impact on the existing levels of green infrastructure on the site is required, and if necessary, mitigation and enhancement is required to offset the implications of any loss if necessary.

##### *Avoidance Measures*

- 3.2. A series of avoidance measures will be implemented as part of the proposed development. These measures are intended to prevent or minimise impacts on biodiversity and existing green infrastructure wherever possible. The avoidance measures to be adopted include:

- **Timing of Works:** Demolition and site clearance activities will be carefully scheduled to avoid impacts on nesting birds and hibernating mammals present within the site;
- **Manual Removal and Species Care:** Elements likely to shelter wildlife will be removed manually and gradually, with particular care during vegetation clearance. If any species are encountered, they will be carefully relocated to nearby hedgerow;
- **Material Management:** Cleared materials will be placed appropriately, away from active work areas, to discourage wildlife from re-entering the construction zone seeking shelter or refuge; and
- **Protective Measures:** Fencing and construction practices will be selected and implemented with consideration for nocturnal species, ensuring no individuals are disturbed or inadvertently trapped

##### *Minimisation Measures*

- 3.3. In addition to the avoidance measures, the following minimisation measures will be implemented to further reduce potential impacts on biodiversity and the surrounding environment:

- **Site Personnel Awareness:** All personnel working on site will receive a toolbox talk led by a licensed surveyor, covering bat ecology, legal protections, and appropriate actions should bats be encountered during works;
- **Roofing Works and Bat Handling:** A licensed surveyor will be present during any roof removal activities. If bat removal is required, only a licensed ecologist will carry this out. Should this not be possible, Natural Resources Wales (NRW) will be contacted. The ecologist will also ensure that all mitigation measures are fully implemented and understood prior to any disturbance to existing roosts;
- **Timing of Works:** Works will be scheduled to align with periods when bats are least likely to be present in the building—typically between 31st October and 31st March. All compensatory roosting provisions will be installed before bats are expected to return from April onwards;
- **Unexpected Bat Encounters:** If bats are discovered at any point during the works, all activities in the immediate vicinity will cease to allow the bats to safely relocate;
- **Injured Bats:** Should a bat be inadvertently harmed during the course of construction, an ecologist will be contacted immediately to arrange for its care and rehabilitation; and
- **Human-Bat Interaction:** In the event that a site worker is bitten by a bat, NRW will be notified promptly

## Mitigation

3.4. In response to the potential impacts of the proposed development on the site's ecological baseline, the following mitigation measures will be implemented to restore and maintain ecological balance:

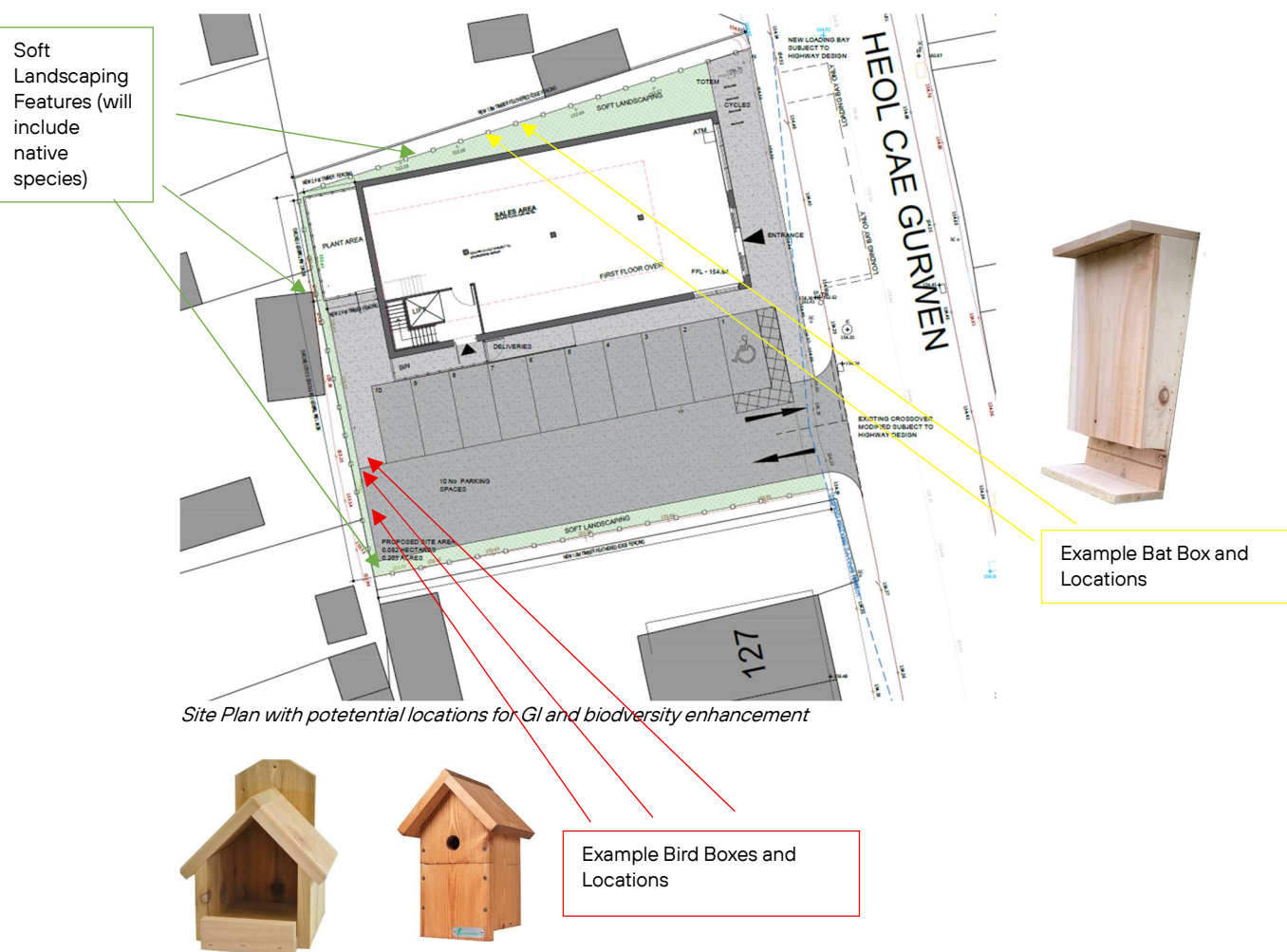
- Site Selection: The development has been located on land of low ecological value to minimise overall biodiversity loss. Specifically, the proposal utilises previously developed (brownfield) land, thereby reducing pressure on undeveloped greenfield sites and helping to protect more ecologically valuable habitats.

## Enhancement

3.5. It is considered that there are opportunities within the site to provide appropriate enhancement measures in order to achieve a biodiversity net gain. As recommended within the Preliminary Ecological Appraisal undertaken in May 2026, the following measures can and will be incorporated into the development:

- Creation of a habitat through soft landscaping, with a diverse range of native species to enhance local wildlife value.
- Installation of a total of 2 bat boxes and 3 bird nest boxes to provide a proportionate ecological enhancement.

3.6. The below extract depicts how such features can / will be included within the development.



- 3.7. Further to the above, it should be noted that the surrounding landscaping features will provide ecological enhancement through the integration of green infrastructure. This green infrastructure mitigates biodiversity loss by providing food and habitat for wildlife in a built up, urban area.

#### Long Term Management

- 3.8. The landscaping, bird boxes, and bat boxes will be subject to long-term management, maintenance, and monitoring to ensure successful establishment and the ongoing function. Management measures will include:
- Ongoing care of landscaping, including watering, protection and replacement of any failed specimens;
  - Sensitive removal of invasive species;
  - General monitoring to ensure the landscaping is establishing as expected; and
  - Regular inspection and maintenance of the bird and bat boxes to ensure they remain functional and suitable for use.

## 4. Green Infrastructure Conclusion

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- 4.1. The above Step Wise GI demonstrates that no negative impacts arise from the proposal, whilst at the same time achieving a significant biodiversity net gain.

### Biodiversity Mitigation and Enhancement

- 4.2. There will be a minimal loss of habitat and species as a result of the proposal. The proposals are sited on previously developed land, to ensure that a minimal amount of biodiversity and ecosystems are lost. No net loss of habitat therefore arises from the development.
- 4.3. Accordingly, it is considered that the development will give rise to only minimal impacts. Appropriate and proportionate biodiversity and green infrastructure measures have been incorporated to ensure the scheme delivers a net gain, in accordance with the objectives of PPW12.
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## 5. Summary and Conclusions

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5.1. Having regard to the above, and in summary, it is considered that the proposed development should be considered acceptable and compliant with the recently updated Chapter 6 of PPW 12, in light of the following key factors:

- A stepwise approach, has been considered for the site, causing no damage to the Green Infrastructure on site;
- Current green infrastructure on site will not be adversely impacted, and instead will look to be enhanced;
- Significant landscape and mitigation planting is proposed for any loss of vegetation;
- To achieve a net benefit, the following Green Infrastructure enhancement measures are being included over and above the existing on-site provision:
  - Installation of 2no. bats boxes within the site prior to the commencement of the works.
  - Installation of 3no. bird boxes within the site prior to the commencement of the works.

5.2. Accordingly, it is considered that the proposed development is acceptable in terms of its impact on the environment and biodiversity, and is fully in accord with Chapter 6 of PPW 12.

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**GJP.**

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