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LANDSCAPE ARCHITECTS

Leiros Parc, Bryncoch, Neath

Green Infrastructure Statement

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On behalf of Codi Group:

codi

Based on the masterplan by Hammond Architecture Ltd:

With planning input by Asbri Planning:

asbri

Drainage proposals designed by CB³:

CB³ CONSULT

Ecology input by:

edp

And Arboricultural input by:

ArbTS

Documents and Drawings

This Green Infrastructure Statement should be read alongside supporting surveys, reports, and plans submitted with the application, including:

- Illustrative Masterplan, Prepared by Hammond Architectural Ltd., January 2026.
- Open Space Plan, Prepared by Hammond Architectural Ltd., December 2025.
- Street Hierarchy Plan, Prepared by Hammond Architectural Ltd., January 2026.
- Green Infrastructure Design, Prepared by Tir Collective, January 2026:
    - LA.1 Green Infrastructure Strategy
    - LA.2 Planting Strategy
    - LA.2 Play Strategy 1
    - LA.3 Play Strategy 2
    - LA.5 Play Strategy 3
- Ecological Appraisal, Prepared by The Environmental Dimension Partnership Ltd, January 2026.
- Arboricultural Report, Prepared by ArbTS - Arboricultural Technician Services Ltd, January 2026.
- FRA and Drainage Strategy Note, Prepared by CB³ Consult.
- Landscape and Visual Appraisal (LVApp), Prepared by Tir Collective.

1 Introduction

1.1 Project Background

1 Tir Collective is instructed by Codi Group to prepare this Green Infrastructure Statement along with a Play Strategy, which relates to a proposal for a residential development in Bryncoch, Neath. The site is located north of Leiros Park Drive, north of the A465, and east of Bryncoch with established residential streets to the south and west of the Site.

2 This Green Infrastructure Statement has been prepared in support of an outline planning application (with all matters reserved except for access) for the construction of up to 250 residential dwellings, public open space, green infrastructure, a small flexible mixed-use/ community space, sustainable drainage features, access arrangements, and all associated landscaping and infrastructure works.

1.2 Purpose and Scope

3 This statement outlines how the proposed development responds to the requirements of Planning Policy Wales Edition 12 (PPW12), the Environment (Wales) Act 2016, and relevant national and local guidance relating to Green Infrastructure (GI), including the step-wise approach to biodiversity and ecosystem reliance. It also references key principles of placemaking and sustainable development.

4 The proposals will deliver a coordinated GI strategy that integrates ecological mitigation, SuDS, landscape planting and arboricultural measures. Particular consideration is given to the relationship of the development with Ancient Woodland and existing trees within the site.

5 This statement draws on supporting material including the preliminary ecology surveys and recommendations, arboricultural input and the emerging highways and drainage strategies. The GI strategy will help ensure net benefit for biodiversity, landscape resilience and long-term multifunctionality of the site.

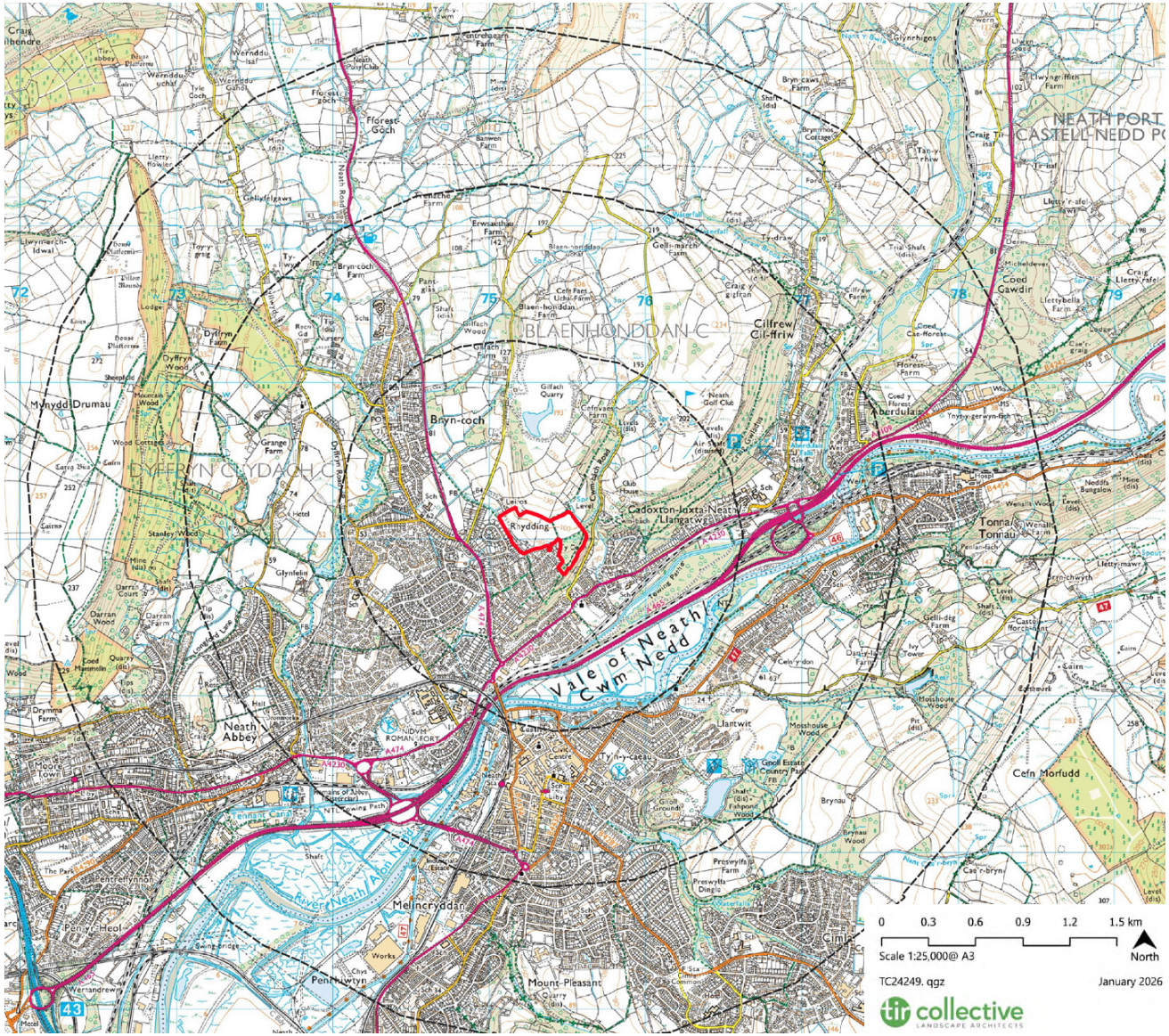


Figure 1: Site location

1.3 The Site

6 The site is located on pastoral agricultural land and is comprised of a series of broadly square shaped fields defined by overgrown hedges/treelines. To the north, the site abuts regular shaped fields on land rising northwards.

7 Land to the east and southeast of the site is deciduous woodland, a proportion of which is ancient woodland. Existing residential development is located on land to the south and southwest. The eastern part of the site is well accessed by several Public Rights of Way which follow internal field boundaries and connect with the nearby residential streets.

1.4 The Proposals

8 The proposed scheme seeks outline planning permission for housing, on land allocated for proposed development as part of the Bridgend Local Development Plan (LDP).

9 The proposals include:

- Minimal removal of existing trees, hedgerows and vegetation.
- Earthworks within existing fields to create levels suitable for residential development.
- The construction of up to 250 residential units, access road and other associated infrastructure. The access road is off Daphne Road and there would also be an active travel route off Leiros Parc Drive.
- Maintaining an ecotone along site boundary vegetation and a buffer zone adjacent to ancient woodland to the east.
- Creation of public open space, landscape based play areas, growing space and a small flexible mixed-use/ community space.
- Landscape and ecological enhancement, including tree planting, woodland, scrub, hedgerows, SuDS features and grassland areas.



Figure 2: Illustrative Masterplan, Hammond Architectural Ltd, June 2026

2 Green Infrastructure

2.1 Existing Green Infrastructure

10 Desktop studies and field surveys have been undertaken to identify and confirm the green infrastructure features present on the site and within its immediate surroundings. The site comprises a range of habitats of ecological value, including woodland and mature hedgerows.

11 The elements that are considered to form the existing Green Infrastructure

- Trees and hedgerows
- Habitats of ecological value

12 These green infrastructure elements are described below, providing an overview of the existing conditions and identifying those features of particular ecological and arboricultural importance prior to application of the stepwise approach to biodiversity and landscape management.

Trees and hedgerows

13 A Tree Survey was carried out by ArbTS, Stephen Lucocq BSc (Hons), Tech Cert (ArborA), M.Arbor.A on March 2016, resurveyed 3rd August 2020 and resurveyed where access allowed 29th July 2024. The Tree Survey Summary Table is reproduced at Figure 3 below:

14 Category A trees are defined as "Those of high quality with an estimated remaining life expectancy of at least 40 years. (*Most desirable for retention*)". The retention of Category A trees has been a priority for the project, in accordance with the **Stepwise Approach Step 1: Avoid** and where loss is unavoidance is not possible, **Step 2: Minimise**.

15 Category A trees comprise 14.2% of the trees on site and are predominantly Quercus petraea (Sessile Oak), 43.1% of the trees surveyed, and some Acer pseudoplatanus (Sycamore), 20.9% of the trees surveyed, (G6, G17, T24, T269, T276, T280, T281, T290, T291, T303, T305, T332, T359, T361, T364, T365, T379, T382, T383, T387, T388, T39, T393, T40, T407, T409 and T415.

16 Quercus cerris (Turkey Oak), 2.8% of the trees surveyed, is also present on site (T36, T394). There is also a category A area of woodland, W1 with Quercus petraea (Sessile Oak), Quercus cerris (Turkey Oak) and Betula pendula (Silver Birch).

17 Category B trees are defined as "Those of moderate quality with an estimated remaining life expectancy of at least 20 years. (*Desirable for retention*). The retention of Category B tree has been a priority for the project where ever possible, in accordance with the **Stepwise Approach Step 2: Minimise**.

18 Category B trees comprise 36% of the of the trees surveyed and are a mix of species:

- Acer campestre (Field Maple)
- Acer pseudoplatanus (Sycamore)
- Betula pendula (Silver Birch)
- Crataegus monogyna (Hawthorn)
- Fraxinus excelsior (Ash)
- Ilex aquifolium (Holly)
- Prunus avium (Wild Cherry)
- Quercus petraea (Sessile Oak)
- Salix caprea (Goat Willow)
- Sorbus aucuparia (Rowan)
- Ulmus glabra (Wych Elm)

19 Category C trees are defined as "those of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm. (*Optional for retention*)". The retention of Category B tree has been an aim of the project where ever possible due to range of benefits that these tree contribute to the green infrastructure of the site and its context, in accordance with the **Stepwise Approach Step 2: Minimise**.

20 Category C trees comprise 45.1% of the of the trees surveyed and are the same mix of species as the Category B trees with the addition of Sorbus aria (Whitebeam) and Laurus nobilis (Bay).

21 The remaining trees on site are not considered to be of any arboricultural or visual merit, are below the threshold of 75-mm diameter when measured at 1.5 metres above ground level or in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years. These are category U and comprise 4.7% of the trees surveyed.

22 The Tree Constraints Plan shown at Figure 4.

BS5837:2012 Quality Category	Total Number of Individual Trees Surveyed	Total Number of Tree Groups Surveyed	Total Number of Tree Areas Surveyed	Total Number of Woodland Areas Surveyed	Total Number of Hedgerows Surveyed	Total
A (High - Most desirable for retention)	27	2	0	1	0	30
B (Moderate - Desirable for retention)	66	6	1	0	3	76
C (Low - Optional for retention)	82	10	0	0	3	95
U (Poor - Unsuitable for retention)	10	0	0	0	0	10
Total A,B,C,U	185	18	1	1	6	211

Figure 3: Tree Survey Summary Table, ArbTS

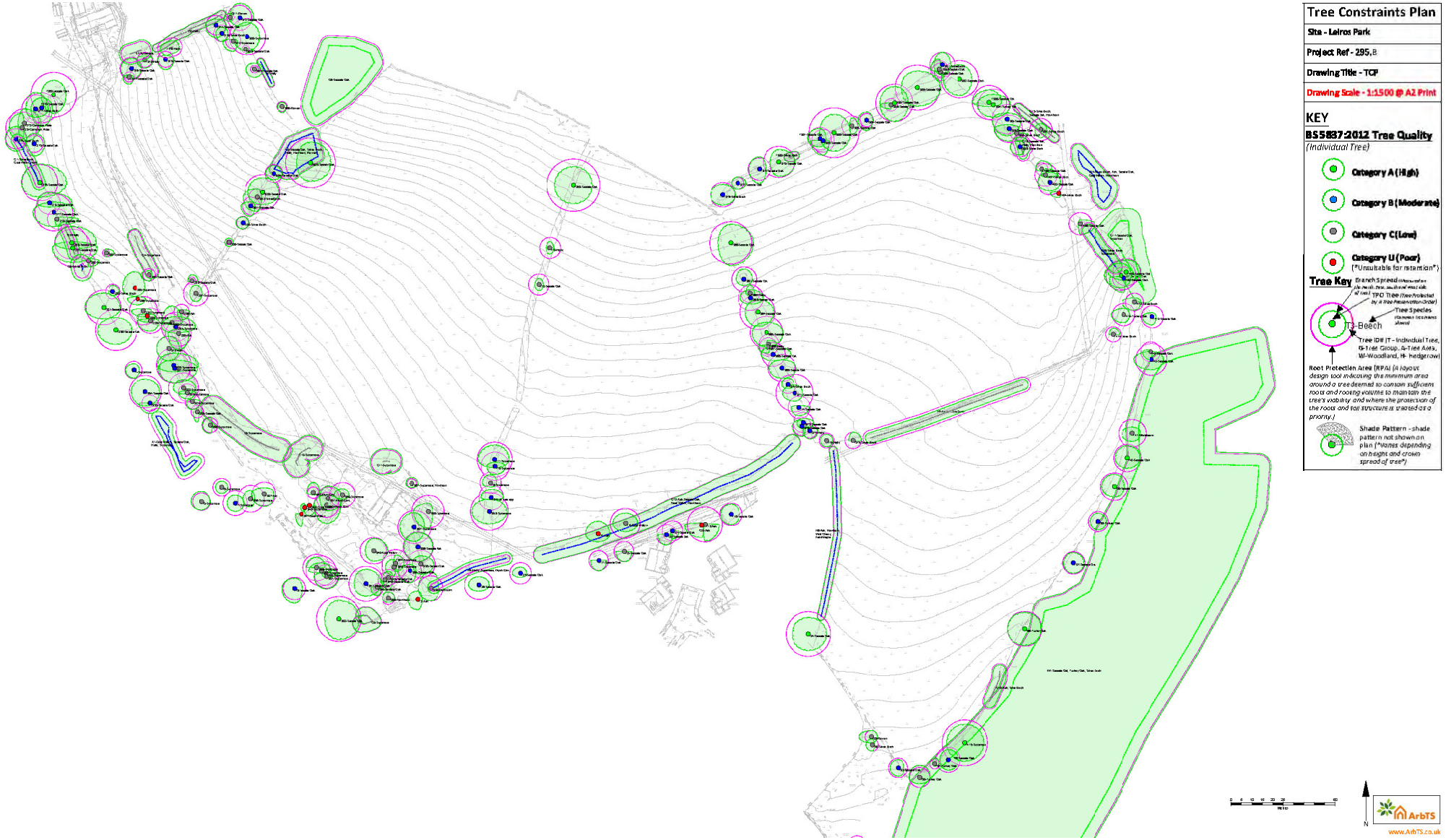


Figure 4: Tree Constraints Plan ArbTS





Site Photographs:

1

1- View from northern most field looking south.

2

2- View from eastern boundary of central field parcel.

3

3- View from eastern boundary into site taken from footpath.



Habitats of ecological value

23 Detailed ecological assessments of the Site were undertaken by EDP during 2024 and comprise a desk study, Extended Phase 1 Habitat survey, botanical assessment and further detailed surveys with respect to bats, breeding birds, badger (Meles meles), dormouse (Muscardinus avellanarius), otter (Lutra lutra) and water vole (Arvicola amphibius).

24 No part of the Site is covered by any statutory nor non-statutory designations. However, there are several such designations within the potential zone of influence of the Site, the most pertinent of which include Crymlyn Bog Ramsar Site and Special Area of Conservation (SAC), the Tennant Canal Site of Importance for Nature Conservation (SINC), Catwg Wetland SINC, Neath Estuary SINC and Neath Canal SINC. In addition, Ancient Semi-natural Woodland (ASNW) lies directly adjacent to the eastern boundary of the Site.

25 With respect to habitats, the Site is characterised by five (F1–F5) agricultural grassland fields subdivided by mature tree lines with a sixth field within the south-eastern corner of the Site dominated by dense scrub (F6). Such agriculturally improved habitats are considered to be of negligible–Site level importance although field F5 is considered to be of Local level importance given its relatively greater botanical diversity, albeit subject to intense grazing pressure and scrub encroachment.

26 The eastern boundary of the Site is defined by broadleaved and ASNW, whilst the southern boundary is delineated by a linear band of dense scrub, woodland and scattered mature/semi-mature trees through which flows a small stream. Such features are judged to be of Local–County-level importance and are Priority Habitats for Wales, with overlapping areas of ASNW comprising an irreplaceable habitat as protected under Planning Policy Wales 12 (February 2024) (PPW).

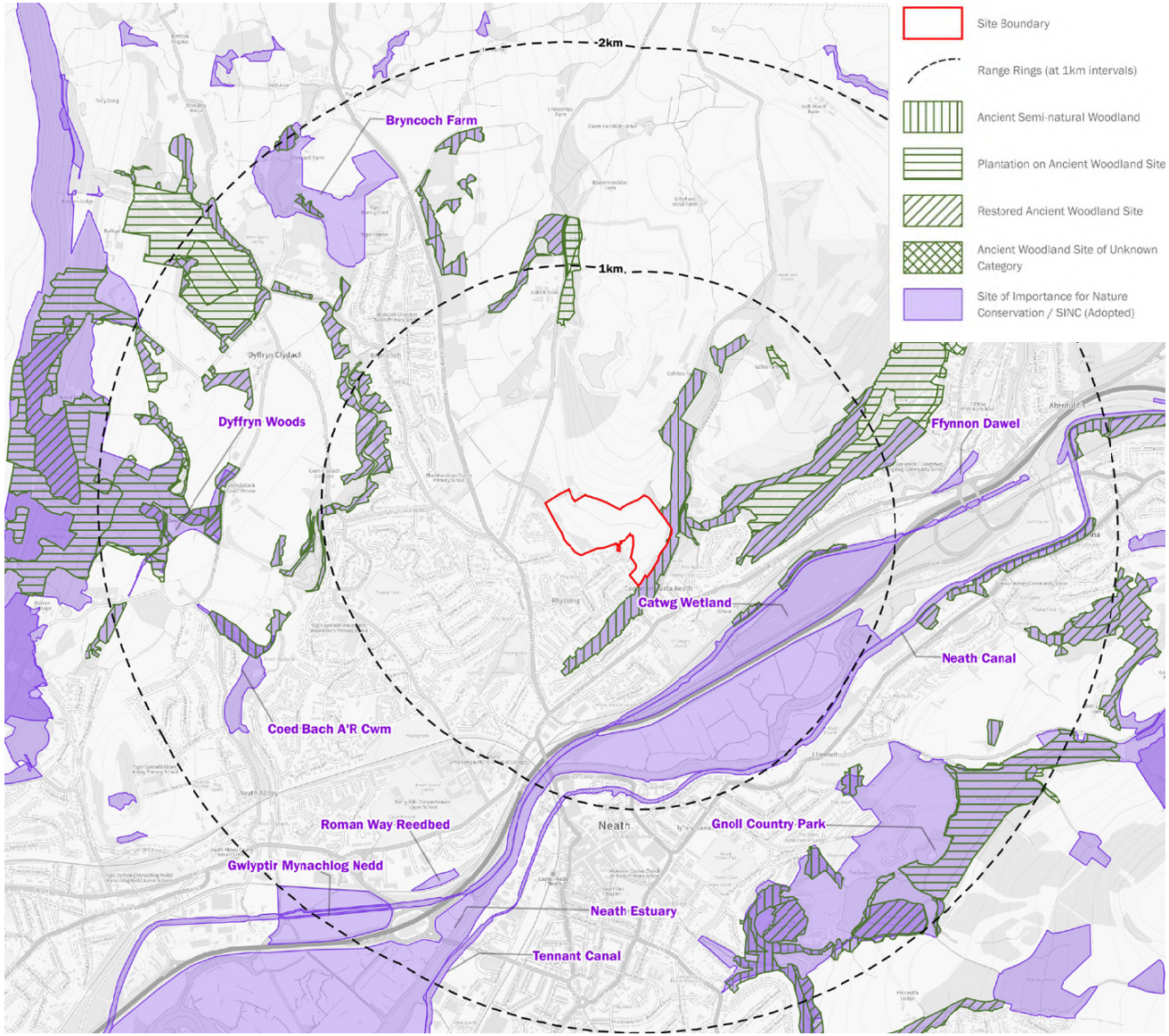


Figure 5: Non-Statutory Designations, EDP, January 2026

27 Habitats supported by the Site are of value for a breeding bird and bat assemblage of Local level importance and also provide suitable habitat for badger, common reptile and amphibians, as well as for notable mammal species such as European hedgehog (Erinaceus europaeus).

Recommendations

28 The DECCA framework comprises five key attributes which must be taken into account when demonstrating steps taken towards securing a net benefit for biodiversity, including the Diversity, Extent, Condition, Connectivity and Adaptability to change of habitats, species and ecosystems.

29 In respect of the proximity of ancient woodland to the eastern boundary of the Site, the development would be offset from the boundaries by a habitat buffer, ecotone planting and low-lux lighting, utilising shields and/or hoods where required.

30 To protect retained habitats during construction, protective fencing will be erected as defined within the AIA.





Figure 6: Non-Statutory Designations, EDP, January 2026

31 The following habitat protection and creation measures are proposed:

- The inclusion of biodiverse, ecotone planting within habitat buffers proposed, to include canopy and understorey tree and shrub planting to front the existing vegetated edge, before transitioning into lower-level shrub and grassland planting extending towards the development edge;
- The creation and management of new native planting within the north-west corner of the Site;
- The provision of sustainable drainage features including a bio-retention system, conveyance swales and permeable surfaces, necessary to maintain run-off rates and improve the quality of surface water prior to discharge;
- The inclusion of significant areas of informal and formal greenspace to ensure sufficient provision of green infrastructure throughout the Site necessary to maximise biodiversity;
- The planting of native shrubs/hedgerows along the boundaries between residential plots and adjacent open green space allowing for the integration of green infrastructure with the built development;
- The provision of new tree planting at a minimum 3:1 ratio to mitigate for proposed losses across the Site. Such habitat creation measures are considered sufficient to compensate for the relative small scale of habitat losses anticipated, whilst ensuring the protection and further enhancement of retained habitats to maximise habitat function and connectivity across the Site for protected and Priority Species;
- Green Infrastructure management measures should be aimed at promoting structural and botanical diversity and enhancing the resilience of this habitat to climatic changes;
- Pre-construction and construction phases of development should be timed to avoid the main bird breeding season (i.e. March to August inclusive).
- It is recommended that bird boxes be installed upon mature trees to be retained. Bird box designs will include two of the following types: Schwegler 3S for starling; or Schwegler nos. 1B with a 32mm entrance, 26mm entrance, and/or oval entrance (or similar).
- In addition, bird nesting chambers should also be installed in groups of two to three nesting chambers upon suitable residential dwellings where located adjacent to Green infrastructure. Bird nesting chambers should include two of the following types: Schwegler Lightweight Swift Box Type 1As/Manthorpe swift brick; Schwegler sparrow terrace/Woodstone house sparrow nest box; and Woodstone house martin nest or similar.
- To facilitate the dispersal of European hedgehog across the Site during operational phases of development, it is further recommended for any proposed close board fencing marking the boundaries between development, formal landscaping features or semi-natural habitat off-site, to include a 13cm x 13cm gap at the bottom to allow hedgehogs to pass through.
- Further enhancements can be achieved through the creation of hibernacula and deadwood log piles within south facing habitat and/or within the natural/informal greenspace areas.

2.2 Design Response

32 The Landscape Concept for the proposed development is guided by the following five concept themes which are illustrated within chapter 3. These are:

1. Connected Landscape
2. Biodiverse Landscape
3. Sustainable Landscape
4. Hands on Landscape
5. Active Landscape

33 The landscape concept themes have defined the approach to the green infrastructure and open space strategy, which follows the six placemaking principles from the Wales Placemaking Charter through a landscape strategy to:

- Respond to the character of the site;
- Retain and complement the green infrastructure of the site;
- Encourage walking, cycling and landscape based play; and
- Create a distinctive place with a unified public realm and landscape design with clear boundary definition.

3 Landscape Concept

	3.1 Brief	3.2 Multi-functionality
	• Development to be connected to existing neighbourhoods, providing opportunities for social interaction and civic participation • Strengthening routes to open space, play opportunities and other community assets • Connect networks of green infrastructure	• Connect networks of green infrastructure to provide a better setting for active travel and play **(Active Landscape)**, SuDS **(Sustainable Landscape)**, and improve biodiversity **(Biodiverse Landscape)** • Improved connectivity offers opportunities for social interaction **(Hands on Landscape)**
	• Working with nature • Landscape to create green streets and spaces that protect and enrich habitats and biodiversity • Wildlife friendly neighbourhoods • Streets should be people places, highly vegetated and attractive	• A nature focused landscape strategy will be easier to maintain and require less resources to do so **(Sustainable Landscape)**. • More biodiversity will improve the connection between residents and nature **(Active Landscape), (Hands on Landscape)**
	• One Planet Cardiff Strategy aims for net-zero carbon development. • Resilient to a changing climate • Schemes to be delivered using low-carbon build methods • SuDS an integral part of the design • Promote walking and cycling	• A nature focused landscape strategy will be easier to maintain and require less resources to do so **(Biodiverse Landscape)**. • Increasing green infrastructure will create more opportunities for nature **(Biodiverse Landscape)** and edible landscape **(Hands on Landscape)**.
	• Opportunities for food growing should be explored with fruit trees planted on site. • Residents should feel valued and proud of neighbourhoods. • Support people's health and wellbeing by bringing them into contact with the natural environment.	• Opportunities for foraging and growing food encourage movement and exercise **(Active Landscape)** while reducing food miles **(Sustainable Landscape)**. • Local involvement in conservation and landscape maintenance can provide a local focus on biodiversity **(Biodiverse Landscape)**.
	• Promote walking, cycling and provide opportunities for food growing • Child friendly neighbourhoods with opportunities for formal and incidental play • Support people's health and wellbeing by bringing them into contact with the natural environment	• Connect networks of green infrastructure to provide a better setting for active travel routes **(Active Landscape)**, SuDS **(Sustainable Landscape)**, and improve biodiversity **(Biodiverse Landscape)**. • Increasing interaction with the landscape through play/exercise/ growing food/ relaxation will foster community responsibility for the landscape **(Hands on Landscape)**.

3.3 Green Infrastructure Strategy

- Create green corridors with active travel, SuDS, habitats, play and edible landscape
- Establish north-south connectivity across the site through diverse grassland and planting habitats





- Focus on habitat creation managed to be more resilient to climate change
- Manage access to Chapel Wood to avoid adverse effects on habitat
- Retain existing trees wherever possible and supplement.
- Create biodiverse green streets





- Minimise the extent of hard landscape to reduce embodied carbon of the landscape scheme.
- Reduce maintenance requirements.
- Prioritise tree planting RASV within soft landscape to reduce reliance on crate
- Integrate SuDS as part of a diverse and resilient landscape.






- Create opportunities for community growing space and incorporate edible species within planting areas.
- Provide opportunities for the community to shape the use and maintenance of the landscape.
- Bring nature into and through the development i.e. habitat for pollinators






- Create green corridors with active travel to make walking/ cycling direct, easy and convenient.
- Establish a setting for informal play and landscape based exercise which is attractive and provides interaction with nature.
- A landscape that changes with the seasons to increase amenity.





The Proposals

4 The Proposals

4.1 Strategy

34 Details of the proposed development are provided on the planning application drawings and the Design and Access Statement accompanying the planning application.

35 Landscape proposals would aim to create a simple hierarchy of spaces focussed around the existing and proposed green infrastructure. The Green Infrastructure. Strategy (**Figure 7**) shows areas of proposed green infrastructure based on the illustrative masterplan for the proposed development. The concept for green infrastructure on the site has also focussed on the protection and positive management of the existing assets.

36 The landscape strategy complements the strong pattern of existing green infrastructure through woodland, tree, scrub and hedgerow planting to improve connectivity. Naturalistic greens paces extend through the site to provide an attractive setting for the development and help to integrate built form sympathetically into the landscape.

37 The retained tree lines are strengthened by additional tree planting and the restoration of a field boundary/ treeline through the centre of the site. The green spaces are physically and visual connected to the residential development areas and include a kick about space and landscape play.

38 Residential amenity and views from proposed properties would benefit from street tree and hedgerow planting to enhance green infrastructure and connectivity, bring nature to residents and seasonal changes to the landscape. The design of the streets creates an attractive public realm, with planting to increase biodiversity and filter intervisibility between houses. Tree planting will include native fruiting and flowering species and combine mixed shrub and perennial planting to provide a source of nectar for pollinators.

Retained woodland, trees and hedgerow

39 Trees and hedgerow within the site are primarily to be retained. Removal has been avoided as far as possible and has been minimised through the sensitive engineering of landform. Development within and access to parcels has required the removal of some individual trees and tree groups/ part groups, which have been subject to AIA and collaboration with the project arborist to minimise impacts as far as possible. The majority of trees required to be removed to facilitate the development are category C trees (low quality), with some category B trees (moderate quality) and no category A tree (good quality). A detailed breakdown of the number and categorisation of trees to be removed is outlined in the AIA.

40 Retained woodland and trees will be protected during construction operations following the BS5837:2012 "Trees in Relation to Design, Demolition and Construction – Recommendations".

41 Retained woodland and tree lines would be managed with the aim to promote ecological value and the health of mature trees. Future management proposals would seek to promote the health of the existing tree resource and infill plant with appropriate tree species that increases species and age diversity to improve resilience and longevity. Management interventions would also address the likely loss of the Ash and Elm within the existing vegetation. Ongoing management of the hedgerows will aim to promote structural and botanical diversity.

Proposed woodland, trees and hedgerow

42 Where tree loss is unavoidable, the tree planting proposals will mitigate for loss, using design and species mixes reflective of the parts lost. Native species will be selected to suit the site conditions, based on the findings of the Tree Survey. Large tree species, Quercus petraea (Sessile Oak) and Acer pseudoplatanus (Sycamore), are common on site and would form the majority of the proposed large tree planting.

43 The non-native Quercus cerris (Turkey Oak) is also relatively common on site and would be included, along with a limited number of visually distinctive species to provide visual interest. Acer platanoides (Norway Maple) and Acer rubrum (Red Maple) would be suitable landmark ornamental tree species to improve amenity value.

44 The smaller native species on site comprising Acer campestre (Field Maple), Betula pendula (Silver Birch), Crataegus monogyna (Hawthorn), Ilex aquifolium (Holly), Ilex aquifolium (Holly), Prunus avium (Wild Cherry) and Sorbus aucuparia (Rowan). These species would be used for the small to medium trees proposed on site within the green spaces.

45 Strengthening of treelines and hedgerows with specimen tree planting is incorporated to reinforce vegetation pattern and restore the field pattern. These would also strengthen ecological corridors, provide screening, and offer foraging and nesting opportunities for birds and invertebrates, diversifying the tree resource for long-term resilience.

46 The proposed tree planting will contribute to the Stepwise approach Step 3: Mitigate / Restore + Enhance and Step 4: Compensate for the impacts.

Native Hedgerows

47 Tree and hedgerow planting will be introduced across the site to improve connectivity, enhance biodiversity and contribute to the long-term ecological resilience of the landscape (Step 3: Mitigate / Restore + Enhance) and (Step 4: Compensate for the impacts).

48 Existing hedgerows on the site are of variable quality and defunct in some areas. Most do not appear to have been subject to recent management and have begun to develop a more scrub-like structure. Hedgerow management will aim to maintain and enhance their value for biodiversity and existing hedgerows will be strengthened through gapping up with new native planting and hedgerows are also proposed as part of the Planting Strategy shown on **Figure 8**.

Grassland

49 Species-rich grassland will be established across open spaces and within SUDs features, providing foraging resources for pollinators, supporting invertebrate populations, and contributing to carbon sequestration and climate regulation. (Step 3: Mitigate/Restore + Enhance).

50 Sustainable Drainage Systems (SuDS), including rain gardens and attenuation areas, will manage surface water runoff while creating new ecological opportunities. These features will incorporate planting of damp grassland and native shrubs to enhance biodiversity and visual amenity. (Step 3: Mitigate/ Restore + Enhance).

Other ecological features

51 Bat and bird boxes will be integrated onto retained trees and new buildings, offering nesting and roosting opportunities in alignment with ecological recommendations. Hibernacula or brash/ log piles within retained areas of woodland and grassland would also be provided.

52 Site lighting will be designed to minimise artificial light spill onto boundary features and all potential roosting features with mature trees to limit impacts to bats.

53 Any fencing is to include an access gap at the bottom to allow continued connectivity for small mammals post-development.


Hedgehog gaps through garden fencing


Ecotone


Species rich wildflower grassland


Corylus avellana


Species rich grassland


Sorbus aucuparia


Crataegus monogyna



Figure 7: Green Infrastructure Strategy



Figure 8: Planting Strategy

4.2 Planting

54 The proposed planting scheme will introduce a simple and structured landscape palette that is ecologically valuable. Tree planting will enhance amenity, support biodiversity and provide visual interest, including native species and formal canopy structure.

55 Strategic woodland planting is proposed in the northwest part of the site for connectivity and amenity, with the aim of enhancing biodiversity and landscape character. Species will include native woodland species and reflect existing woodland species on site.

56 Specimen shrubs and hedgerows will create focal points and provide visual interest and diversity, supporting biodiversity. Species will include predominantly native species along with some evergreen and structural species, along with colourful perennials for visual and wildlife interest. Formal hedgerows will create boundary treatments, enhance visual appeal and support biodiversity. Street trees are proposed within the rain garden verges to further promote connectivity and amenity value.

57 The planting strategy includes a variety of flowering and fruiting species which will provide contrast and year-round interest. Planting will include a combination of trees grasses, herbaceous plants and shrubs, located to define front gardens and along footpaths.

58 Grassland areas within the site will be species diverse, based on Emorsgate EM1 General Purpose Meadow Mixture which will be used in the open spaces, and EL1 Flowering Lawn Mixture which will be used within garden areas. Alternative, locally sourced seed mixes would be preferred where available.

59 The planting strategy includes native and non-invasive ornamental species throughout. Native species are used to create and enhance existing boundary hedgerows, whilst ornamental non-native hedgerows create, and screen boundary treatments. The native species chosen provide fruiting and flowering and also offer interest due to foliage colour.

60 Where plant material is used of native species, there is a preference for local provenance plants, which in this case would be seed source zone 303 or 304, as defined Forest Practice Note No. 8, titled Using Local Seed Sources for Planting Native Trees and Shrubs, Forestry Commission (1999).

4.3 Play Strategy

The play strategy for the site is for landscape-based play using natural elements arranged through the green spaces and Central Green. It is proposed that the green spaces within the site will form a connected series of green spaces, which can be accessed from the Central Green. Within the spaces, rather than a single play space, play opportunities will be distributed through the open spaces as a disaggregated Local Equipped Area of Play (LEAP). With the green spaces there will be:

1. Wildflower and species rich grass - to reinforce contact with nature. These areas will provide habitats for pollinators and add colour throughout the seasons.

2. Kick about space - a level area of amenity grass in the central of the site which can be a multi-functional space.

3. Natural Play Areas - based on the use of natural elements such as logs, boulders, and landform to climb on and explore, encouraging imaginative play.

4. Natural Play Areas - based on the use of natural elements such as logs, boulders, and landform to climb on and explore, encouraging imaginative play.

5. Picnic Area - space for people to relax and enjoy the natural setting which encourages people to enjoy the outdoors while encouraging biodiversity and community engagement.

6. Meandering Paths - the paths will meander through the green spaces, encourage exploration and contact with nature.

7. Seating Areas - a variety of seating opportunities to encourage social interaction. Benches to be provided and informal seating using natural materials like fallen branches and stones for people to enjoy nature.

8. Habitat mosaic - Include a diverse range of habitats, complemented by the SuDS features, including small areas of shrubs, hedges, wildflower meadows and trees. Bug hotels could also be included to support local wildlife.



Figure 9: Play Strategy



Figure 10: Growing Space and Play Strategy



Figure 11: Growing Space and Play Strategy










Green Infrastructure

5 Green Infrastructure Statement

5.1 Stepwise Approach

61 A stepwise approach was applied through the design process. The first stage was to **Identify and Assess the value of existing Green Infrastructure,** refer to section 2 above. The retention of existing GI was a priority wherever possible, in accordance with **Step 1: Avoid** and **Step 2: Minimise.**

62 Step 1 - The proposed development at Leiros Parc will seek to minimise or avoid impacts on green infrastructure, where feasible. Where possible, areas of woodland, trees and hedgerows will be retained and protected throughout the design and construction of the development. Existing hedgerows, trees and woodland on the site provide important wildlife corridors and connections, whilst providing a landscape framework and visual amenity resource for the development. Retained woodland, trees and hedgerow would be protected during construction operations following the BS5837:2012 "Trees in Relation to Design, Demolition and Construction – Recommendations".

63 Step 2 - Where tree loss is unavoidable, sensitive design of features such as the access roads crossing tree lines and development close to existing trees within parcels will minimise impacts.

64 Tree and vegetation that is to be removed would be removed outside the bird nesting season (March to August). If this is not possible, a qualified Ecologist will check for nesting birds and active nests will be left undisturbed.

65 Any potential bat roots on site will also be protected. Proposed lighting on the site will also seek to avoid potential impacts on commuting and foraging bats that may be present.

66 Timing constraints for construction would reduce the disturbance to Otter and other nocturnal species.

67 Mitigation for the habitats and species follows the stepwise approach **Step 3: Mitigate/Restore,** see below paragraphs.

68 Enhancement opportunities for the habitats and species will follow the stepwise approach **Step 4: Compensate** for the impacts, see below paragraphs.

5.2 Ecology

69 The development has been designed to retain those habitat features of greatest ecological importance as far as possible. This includes:

- The retention of the majority of the hedgerow/treeline network on-site, with impacts limited
- to the creation of a break in the Site's southern boundary (impacting H9), linking an Active Travel Route to Leiros Parc Drive, and within internal hedgerows/treelines H2, H4, H5 and H6 necessary to accommodate access roads through the development whilst also enabling connections to adjacent residential development via Daphne Road;
- The retention of trees considered to support potential roosting features for bats, including trees T1–T7, T9–T15 and T17–T27;
- The retention of the majority of trees considered to support potential roosting features for bats, including trees T1–T7, T9–T15 and T17–T24 and T26-27 with losses limited to potential removal of T25;
- Protection of ancient woodland located off-site to the immediate east/south-east, retention of on-site broadleaved semi-natural woodland located adjacent, together with the provision of a significant habitat buffer measuring between 15m and 30m wide further offsetting the development footprint from ancient woodland; and
- The offsetting of development away from other vegetated boundaries of the Site through the provision of further significant habitat buffers measuring, on average: c.15mwide where adjacent to the northern hedgerows/treelines (H3) and additional areas of broadleaved semi-natural woodland habitat located off-site; and c.10m–20m wide where adjacent to the south-western and south-eastern boundaries of the Site supporting further broadleaved semi-natural woodland.

70 This will be combined with the creation of new habitats to compensate for the loss of hedgerow sections and trees in particular, but also to deliver net benefits to biodiversity through the provision of structurally and botanically diverse habitat features.

71 Subject to the implementation of the measures summarised above, impacts on retained habitats will be avoided and net gains in biodiversity will be achieved in accordance with relevant planning policy.

72 Overall, those habitat retention and enhancement measures recommended above in relation to non-statutory designations and valued habitats, combined with the measures outlined above, are considered sufficient to minimise impacts upon the breeding bird assemblage.

5.3 Arboriculture

73 The Arboricultural Impact Assessment (AIA) has been prepared by ArbTS based on the proposed masterplan, IMP-01_Illustrative Masterplan prepared by Hammond Ltd and Green Infrastructure Strategy, LA.1, prepared by Tir Collective Ltd.

74 **No Category A Individual trees, groups, woodland or hedgerows are proposed to be removed as a result of the proposed development**. The housing layout and earthworks proposals have also avoided impacts on the Root Protection Areas of Category A trees.

75 Overall tree loss has been confirmed as 55 no. trees (26 individual trees, 29 trees within tree groups, and 20 metres of hedgerow). In total, 48 no. of the trees identified for removal are low or poor quality trees (C / U Category = 48 Trees = 87% of total tree loss).

76 The AIA confirmed that "These trees should not present a significant constraint when developing the site. The removal of moderate-quality trees (7 B Category) can be mitigated by suitable compensatory tree planting and practical woodland management (i.e. invasive species removal, etc.).

77 The following trees and hedgerows are required to be removed to facilitate the construction of the proposed development design:

Individual Tree Loss

- T299 – Oak – Low Quality (C Category)
- T298, T297 – Oak and Ash – Low Quality (C Category)
- T361 – Oak – Moderate Quality (B Category)
- T362 – Holly – Low Quality (C Category)
- T370 – Birch – Moderate Quality (B Category)
- T371 – Oak – Moderate Quality (B Category)
- T29 – Rowan – Low Quality (C Category)
- T30 – Birch – Low Quality (C Category)
- T32 – Oak – Moderate Quality (B Category)
- T31 – Ash – Low Quality (C Category)
- T33, T34 – Oak – Low Quality (C Category)
- T19 – Ash – Low Quality (C Category)
- T20 – Ash – Poor Quality (U Category)
- T17 – Ash – Poor Quality (U Category)
- T16 – Goat Willow – Low Quality (C Category)
- T357, T338, T353 – Sycamore – Low Quality (C Category)
- T352, T351, T350 – Wych Elm – Low Quality (C Category)
- T347, T348, T349 – Goat willow and sycamore – Poor Quality (U Category)

Grouped Tree Loss –

- Tree Group – G18 – 2 trees – Low quality (C category)
- Part of Tree Group – G12 – 3 trees – Moderate Quality (B Category)
- Tree Group – G11 – 4 sycamore trees – Low quality (C category)
- Tree Group – G10 – approx 10 individual sycamore trees – growth from coppiced
- Tree Group – G4 – approx 10 individual sycamore trees – growth from coppiced

Hedgerow – Low quality (C category)

- Hedgerow H5 – Length 20 metres - Low quality (C category)

78 There are areas of minor conflict between the construction of the proposed scheme and some trees RPA (Root Protection Area), which has been addressed within the AIA. To ensure no net damage of RPA occurs from this conflict, an additional functional rooting environment around these trees is to be protected, allowing a new area for future root growth to be available for any minor loss. Other RPA potential damage can all be managed through the installation of tree protective fencing, arboricultural watching brief for excavation works within RPA etc., as designed by an Arboriculturist will ensure no significant long-term adverse impact will occur to any of the retained trees.

79 In order to mitigate Future Tree Pressures, the development design has allowed for amenity areas formed around the high-value oak trees T360, T359, T364, T365 etc. In addition, suitable separation distances have been provided between dwellings and the high value trees. The AIA confirms that "overall, the design has considered the size and value of the trees on this site to minimise any future pressures to heavily prune or fell the higher-value trees.

80 The AIA states that "The proposal will not cause a long-term adverse impact on the local amenity of the area through tree loss. Mitigative tree, hedgerow and shrub planting will be required for the loss of the trees on this site through a combination of different diverse tree/shrub species and varied nursery-aged stock. The construction of the proposed development, whilst complying with the tree protection scheme as detailed in section 6, will ensure that no significant long-term adverse Arboricultural impact occurs on the health of any retained trees on or adjacent to this site or the long-term amenity of the area.

Habitat of ecological value

81 EDP has provided specific proposals for the avoidance, mitigation and compensation of any predicted impacts including, where possible, the protection of those valued features within and adjacent to the Site and creation of new habitats to compensate for proposed losses, whilst delivering new foraging, breeding and refuge opportunities for protected/notable species.

82 Overall, given the scale of the development proposals and scope of those proposed mitigation measures in respect of habitats and protected/notable species, EDP considers that the scheme is capable of compliance with relevant wildlife legislation and planning policy for the conservation of the natural environment at all levels, whilst also delivering benefits to biodiversity and ecosystem resilience.

5.4 Overall

83 The findings of the arboricultural and ecological surveys have informed the green infrastructure strategy of the site and will continue to inform the development proposals going forward. The green infrastructure strategy will seek to increase species diversity through the planting of native trees, shrubs, hedgerows, and wildflower and species-rich grassland areas, alongside the retention of key existing features, where feasible. The positive management of existing assets, including the woodland, trees and hedgerow on site should aim to deliver longevity and green infrastructure enhancement.

84 Sustainable Drainage Systems (SuDS), including rain gardens and attenuation areas would be proposed and will integrate diverse planting species to provide habitat for pollinators and other wildlife, while also managing surface water runoff. There will be opportunities to incorporate bird and bat boxes throughout the site for habitat creation. The open space in the east part of the site could include woodland planting, hedgerows, and species-rich grassland to deliver compensatory habitat and further strengthen ecological connectivity across the wider landscape.

85 Collectively, these measures would enhance the biodiversity and ecological resilience of the site.

Multi-functionality of Green Infrastructure

86 This section identifies the multi-functionality of each of the green infrastructure elements: trees and hedgerows, habitats of ecological value, along with the proposed elements: trees, woodland, native planting, SuDS, species-rich grassland and shrub planting.

87 These elements reflect the over arching principle of Stepwise Step 3: Mitigate / Restore, Step 4 : Compensate and by considering Enhancement at each stage in accordance with the DECCA Framework, applying the principles of good placemaking and green infrastructure.

Landscape asset	Green infrastructure element	Functions	Building with Nature Standards
Retained Trees	Trees / vegetation	• Contribution to Placemaking • Cooling and Shade • Calming and Inspiring • Health and Wellbeing • Nutrient Cycling • Wind break • Cleaning Water and Air	2 - Positively Responds to the Climate Emergency 4 - Champions a Context Driven Approach 5 - Creates Distinctive Places 6 - Secures Effective Place-keeping
New tree and hedgerow planting	Trees / vegetation	• **Wildlife Habitat** • Contribution to Placemaking • Cooling and Shade • Calming and Inspiring • Health and Wellbeing • Nutrient Cycling • Cleaning Water and Air	1 - Optimises Multi functionality and Connectivity 2 - Positively Responds to the Climate Emergency 3 - Maximises Environmental Net Gains 5 - Creates Distinctive Places 7 - Brings Nature Closer to People 11 - Delivers Wildlife Enhancement 12 - Underpins Nature's Recovery
Proposed shrub planting	Trees / vegetation	• **Contribution to Placemaking** • Health and Wellbeing • Calming and Inspiring	1 - Optimises Multi functionality and Connectivity 2 - Positively Responds to the Climate Emergency 3 - Maximises Environmental Net Gains 7 - Brings Nature Closer to People
Proposed SuDS features	Sustainable Drainage	• **Cleaning Water and Air** • Flood Mitigation • Contribution to Placemaking • Calming and Inspiring • Nutrient Cycling • Wildlife Habitat • Cleaning Water and Air	1 - Optimises Multi functionality and Connectivity 2 - Positively Responds to the Climate Emergency 5 - Creates Distinctive Places 7 - Brings Nature Closer to People 9 - Delivers Climate Resilient Water Management 10 - Brings Water Closer to People
Proposed bird and bat boxes	Habitat	• **Wildlife Habitat** • Calming and Inspiring	1 - Optimises Multi functionality and Connectivity 3 - Maximises Environmental Net Gains 7 - Brings Nature Closer to People 11 - Delivers Wildlife Enhancement 12 - Underpins Nature's Recovery

Figure 12: Landscape assets, GI element and GI functions with signposting against the Building with Nature Standards.

Conclusion

6 Conclusion

6.1 Resilience of Ecosystems

88 The Environment (Wales) Act 2016 provides a duty upon public bodies such as Neath Port Talbot to promote the resilience of ecosystems.

89 The proposed green infrastructure strategy would comprise a range of both native and non-native species to enhance biodiversity and botanical diversity. The species selected are climate resilient, adaptable to wet and dry conditions, including lengthy dry spells. The range of both tree and plant species proposed would enhance the biodiversity, increase species diversity, the age diversity of vegetation and improve habitat resilience to climate change.

90 The proposed green infrastructure strategy has considered the existing green infrastructure features within and beyond the site boundary and retained those of value, as recommended by the Stepwise approach. Proposed green infrastructure features would increase the biodiversity, species diversity, and habitat structure on the site whilst contributing to the multi-functionality of the green infrastructure elements.

6.2 Green Infrastructure

91 The proposed development has been designed with a comprehensive Green Infrastructure strategy that integrates ecological, arboricultural, and landscape measures across the site. Existing vegetation and trees have been retained wherever possible, with appropriate buffers and Root Protection Areas implemented to safeguard habitats and connectivity. Mitigation measures, including careful timing of vegetation clearance, species-specific protections, and sensitive lighting, ensure that ecological receptors are not adversely affected during construction.

92 Enhancement and compensation measures, such as management and control, native and ornamental tree and shrub planting, managed grassland, SuDS, and habitat provision for birds, bats, and small mammals, will deliver long-term biodiversity benefits. The proposals create multifunctional spaces that support both ecological and amenity objectives, contributing to landscape resilience and connectivity within the surrounding environment.

93 Overall, the development will not result in any significant adverse ecological effects and will provide a net benefit in biodiversity, reinforcing the site's ecological value and delivering a high-quality, sustainable landscape setting for future users.

6.3 Conclusion

94 With regards to the **Placemaking Wales Charter** the landscape proposals make a good contribution towards the six placemaking principles, which cover the range of considerations that contribute to establishing and maintaining good places.

95 The proposals contribute well to the 12 Standards of Building with Nature, creating well connected, multi-functional green infrastructure.

96 Overall, the proposed development is considered to be in accordance with PPW Edition 12 Chapter 6.

Appendix

7 Appendix

7.1 Legislation and Policy

Wales Legislation

97 Legislation and Policies central to this document include:

- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016
- Future Wales: The National Plan
- Planning Policy Wales (PPW)
- Neath Port Talbot Local Development Plan (2011-2026)

Well-being of Future Generations (Wales) Act 2015

98 The Act requires public bodies to carry out sustainable development. Sustainable development principle is "the process of improving the economic, social, environmental and cultural well-being of Wales." The principle is made up of five ways of working, including looking to the long-term; taking an integrated approach; involving a diversity of the population; working collaboratively; and preventing issues. It sets out seven well-being goals including resilience and being globally responsible.

Environment (Wales) Act 2016

99 The Act is intended to work alongside the Well-being of Future Generations Act. It included a new biodiversity duty to reverse the decline of biodiversity and to secure long-term resilience.

100 Section 6 states "A public authority must seek to maintain and enhance biodiversity… and in so doing promote the resilience of ecosystems". In relation to resilience of ecosystems, the following "must be taken into account:

(a) diversity between and within ecosystems;

(b) the connections between and within ecosystems;

(c) the scale of ecosystems;

(d) the condition of ecosystems (including their structure and functioning);

(e) the adaptability of ecosystems." National Planning



Figure 13: The seven well-being goals from Well-being of Future Generations (Wales) Act, 2015

National Planning Policy

Future Wales: The National Plan

101 The proposed development aligns with the strategic aims of Future Wales: The National Plan 2040, which sets a national framework for delivering sustainable, climate-resilient, and inclusive places. It supports the ambitions of the Well-being of Future Generations (Wales) Act 2015 and Planning Policy Wales (Edition 12), with specific relevance to the following policies:

- **Policy 2 – Shaping Urban Growth and Regeneration – Sustainable Places**
  Promotes regeneration that enhances the built and natural environment, improves public health and well-being, and supports the creation of vibrant, inclusive communities.
- **Policy 3 – Supporting Urban Growth – Public Sector Leadership**
  Policy 9 – Resilient Ecological Networks and Green Infrastructure
  Requires all development to demonstrate how biodiversity and green infrastructure are maintained and enhanced through nature-based solutions. The design responds through new tree planting, pollinator-friendly species, SuDS features, and provision for urban wildlife.

Planning Policy Wales (PPW)

102 PPW aims to contribute towards the delivery of sustainable development, embedding the principles of the Well-being of Future Generations (Wales) Act 2015. PPW ingrains Placemaking Wales Charter and how sustainable development can be achieved through implementing placemaking.

103 **Section 6.2** sets out **green infrastructure** should be given early consideration in development proposals and how it should be integrated into developments.

- **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… 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 has been applied**."
- **Paragraph 6.2.14** states "Development proposals should be informed by the priorities identified in green infrastructure assessments and locally based planning guidance. The **Building with Nature standards** represent good practice and are an effective prompt for developers to **improve the quality of their schemes and demonstrate the sustainable management of natural resources**."

- **Section 6.4** describes **biodiversity and ecological networks** and provides a summary of the **Step-Wise Approach** and how it should be used to "**maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity** by ensuring that any adverse environmental effects are firstly avoided, then minimised, mitigated, and as a last resort compensated for."[1] **Paragraph 6.4.12** states "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**."
- In relation to **trees, woodland and hedgerows, paragraph 6.4.37** sets out their importance for biodiversity and "connecting habitats for resilient ecological networks and make an essential wider contribution to landscape character, culture, heritage and sense of place…"
- The **planting of new trees, hedgerows, groups of trees and areas of woodland** should be promoted as part of new development. Existing trees/ groups of trees, hedgerows and areas of woodland must be protected "where they have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial green infrastructure function."[2]
- In relation to the permanent removal of trees, woodland and hedgerows, it "will only be permitted where it would achieve significant and clearly defined public benefits."[3] The step-wise approach must also be followed. Where loss is unavoidable, PPW sets out the requirements of replacement planting, which "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."[4]
- Finally, in relation to **SuDS,** paragraph 6.6.18 states "The provision of SuDS must be considered as an **integral part of the design of new development** and considered at the earliest possible stage when formulating proposals for new development." Paragraph 6.6.19 goes on to state "Design for multiple benefits and green infrastructure should be secured wherever possible…"[5]

1 Paragraph 6.4.11, Planning Policy Wales Edition 12, February 2024
2 Paragraph 6.4.39 Planning Policy Wales Edition 12, February 2024
3 Paragraph 6.4.42 Planning Policy Wales Edition 12, February 2024
4 Paragraph 6.4.42 Planning Policy Wales Edition 12, February 2024

Technical Advice Note (TAN) 12 - Design (2016)

104 TAN 12: Design provides national planning guidance on achieving good design in the built environment. It outlines the importance of understanding the context of the site and ensuring that development proposals positively contribute to local character, community cohesion, sustainability, and placemaking. The guidance supports the delivery of the Placemaking Wales Charter and the goals of the Well-being of Future Generations (Wales) Act 2015.

5 Paragraph 6.6.19 Planning Policy Wales Edition 12, February 2024

105 Key design principles relevant to the proposed development include:

- "Those involved in the design process need to recognise existing urban qualities and find ways of ensuring that new development strengthen or complement these." (TAN 12, p.37, 2016)
- "The design of housing layouts and built form should reflect local context and distinctiveness, including topography and building fabric. Response to context should not be confined to architectural finishes… To help integrate old and new development and reinforce hierarchy between spaces, consideration should be given to retaining existing landmarks, established routes, mature trees and hedgerows within housing



Figure 14: The Step-Wise Approach from PPW Edition 12, Chapter 6

areas as well as introducing new planting appropriate to the area." (TAN 12, p.43, 2018)

- "The location and definition of public and private space and the design of boundary treatment are particularly important… New development should take account of the existing relationship of buildings to landscape and the local means of boundary definition such as hedges, walls, and fences… ensuring a balance with the need to promote features of environmental sustainability." (TAN 12, p.43, 2016)
- "Building at higher densities is not synonymous with high rise development and innovative good design is a prerequisite to the success of higher densities. The perception of lower density can be influenced by skilful design." (TAN 12, p.38, 2016)

Technical Advice Note (TAN) 5 - Nature Conservation

106 The key principles of positive planning for nature conservation in TAN 5 are as follows:

- Work to achieve nature conservation objectives through a partnership between local planning authorities, Countryside Council for Wales (CCW), the Environment Agency (EA) Wales (CCW and EA Wales are now collectively Natural Resources Wales (NRW)), voluntary organisations, developers, landowners and other key stakeholders;
- Integrate nature conservation into all planning decisions looking for development to deliver social, economic and environmental objectives together over time.
- Ensure that the United Kingdom's (UK) international and national obligations for site, species and habitat protection are fully met in all planning decisions;
- Look for development to provide net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally;
- Help to ensure that development does not damage, or restrict access to, or the study of, geological sites and features or impede the evolution of natural processes and systems especially on rivers and the coast;
- Forge and strengthen links between the town and country planning system and biodiversity action planning particularly through policies in local development plans and the preparation of supplementary planning guidance that adds value to Local Biodiversity Action Plans (LBAP) by highlighting the ways in which the planning system can help to deliver the objectives of LBAPs in practical ways;
- Plan to accommodate and reduce the effects of climate change by encouraging development that will reduce damaging emissions and energy consumption and that helps habitats and species to adapt to climate change.

Local Planning Policy

Neath Port Talbot Local Development Plan (2011-2026)

107 The Neath Port Talbot Local Development Plan was adopted on the 27th of January 2016. Policy SP 10: Open Space requires that new developments address the need for provision of, and access to, adequate open space in order to address inequalities in open space provision and providing more opportunities for more active lifestyles.

108 Policy EN 7: Important Natural Features states that any proposed development that would adversely affect features deemed visually or ecologically important (examples being trees, hedgerows/field boundaries, watercourses, or ponds) would only be permitted if;

- A full account of relevant features have been taken into account within the development and measures put in place to retain and protect these features where possible;
- The relevant features biodiversity value and role has been considered, and where removal is unavoidable, mitigation measures are agreed.

109 Point 5.3.37 goes on to emphasise that other local features that provide a benefit to biodiversity can serve as corridors, connecting areas of biodiverse importance allowing for movement of species. These features can be multi-functional, acting as footpaths, cycle routes, recreational open space, etc, and should be retained and enhanced where possible.

110 Policy SP 16: Environmental Protection requires that air, water, and ground quality and the environment will generally be protected and improved where feasible by ensuring proposals have no significant adverse effects on people or landscape which would significantly increase pollution levels. This is to ensure that proposed developments will not increase the number of people exposed to significant levels of pollution.

111 In relation to Green Infrastructure and biodiversity, Policy BE 1: Design states that proposals will only be permitted if the development can 'demonstrate high quality design which fully takes into account the natural, historic, and built environmental context and contributes to the creation of attractive sustainable places' and satisfies the criteria highlighted. Criteria relative to this proposal relating to green infrastructure and biodiversity have been listed below;

- Materials used as part of the development will be appropriate to it's surroundings, incorporating hard and soft landscaping and screening where appropriate;
- Important local features (buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;
- Drainage systems as part of the proposals are designed to limit surface water run-off, flood risk, and prevent pollution.

Neath Port Talbot Local Development Plan (2011-2026) – Biodiversity and Geodiversity SPG (May 2018)

112 The Biodiversity and Geodiversity SPG highlights in Point 2.4.2 that "Green infrastructure assets are often multi-functional and can deliver a great number of benefits to society, including green space". This point emphasises the economic value generated by safeguarding, enhancing green infrastructure and biodiversity assets, this includes SuDS.

113 Point 5.1.4 highlights that sufficient information regarding existing green infrastructure assets within the Site and surrounding must be collected and considered in the design proposals, taking into account any potential direct and indirect impacts upon on-site and off-site biodiversity/geodiversity and their significance.

114 The document sets out a 'Stepwise approach' to maintaining and enhancing biodiversity. This approach serves the general principles for Biodiversity and geodiversity in planning and development which are set out below:

- Anticipate all potential biodiversity impacts of a development proposal as early as possible in the planning process;
- Protect designated sites, protected species, priority/S7 habitats and species;
- Ensure development does not lead to net loss of biodiversity;
- Identify opportunities for a development to contribute towards a net gain for biodiversity and protection of geodiversity;
- Take account of indirect and cumulative impacts;
- Recognise the importance of, and protect wildlife corridors and stepping stones;
- Prevent and aim to reverse habitat fragmentation and species population isolation.

115 The Stepwise approach is an six-step process, comprising the following:

- Identify and safeguard any existing, or potential, important habitat/species and ecological connectivity.
- Avoid loss of any existing or potential important habitats or species; or fragmentation of ecological connectivity.
- Design biodiversity into applications/projects (e.g. landscaping, SUDs, site layout, living roofs and facades etc).
- Mitigate for any unavoidable harm or loss to important habitat/species or fragmentation of ecological connectivity.
- Compensate for any unmitigatable habitat/species losses that can be justified.
- Enhance and increase the biodiversity of the site or off-site, if on-site cannot accommodate such requirements.
- Monitoring to ensure compliance with agreed biodiversity/geodiveristy obligations/conditions.
- Management to maintain the quality of the biodiversity/geodiversity for the long term.

116 Enhancement Opportunities have also been mentioned in the SPG, stating that "All development proposals, whether or not there is a need to incorporate mitigation or compensation measures, should seek to provide additional benefits or 'enhancement' opportunities for biodiversity and/or geodiversity." Recommendations of some general potential enhancement opportunities that would benefit biodiversity and could be applicable to this Site have also been listed in the SPG and are stated below:

- Areas of new habitat, such as woodland, scrub, grassland or ponds;
- New open space and landscaping to create wildlife corridors;
- Nesting or roosting opportunities on new buildings;
- Green/brown roofs and facades to create habitats of biodiversity value;
- Inclusion of SuDS schemes based on reedbeds and ponds;

117 Within the SPG, point 5.1.20 emphasises what biodiversity impacts a development should avoid to ensure important habitats, species, and geological features are protected. The specifics emphasised are:

- Avoiding impacts on statutory and non-statutory designated sites (including SINCS and RIGS) and protected species;
- Avoid adverse impacts to priority habitats and species identified in the LBAP and under S7 Environment (Wales) Act 2016.
- Retain existing habitat, species and features of biodiversity or geodiversity conservation significance in the site layout and design of the development.
- Avoid isolating existing habitats and species within the development by providing links to adjacent habitats (i.e. wildlife corridors). These could include hedgerows, stepping stones or suitable habitats for more mobile species.
- Carefully design drainage so as not to impact on hydrologically-sensitive habitats, such as wet woodland, bogs and marshy grasslands.
- Retain and build in key green infrastructure assets into the development design to maintain functionality of the on-site and wider environment green infrastructure.

118 The SPG states under point 5.1.23 that compensation of biodiversity loss will only be agreed, and should only be implemented, as a last resort if loss of biodiversity is unavoidable despite mitigation. Compensation will only be considered by the LPA if the development can demonstrate that all avoidance and mitigation measures have been investigated.

119 Point 5.4.3 states that "Where measures to protect, mitigate, compensate, or enhance biodiversity and/or geodiveristy have been set out as part of a planning permission, developers are also likely to be required to provide for their monitoring and management during and post-construction to ensure biodiversity/geodiversity objectives are fulfilled."

7.2 Relevant Guidance

Placemaking Wales Charter

120 The Placemaking Wales Charter has been developed by Welsh Government and the Design Commission for Wales in collaboration with the Placemaking Wales Partnership. The charter outlines six placemaking principles that cover the range of considerations that contribute to establishing and maintaining good places.

121 Well designed, maintained and connected green infrastructure is an essential component of good placemaking. The design of the proposed development should focus on well connected GI with multi-functionality to maximise the benefits to residents and the environment.

Landscape Institute Green Infrastructure: An integrated Approach, 2013

122 The document defines **Green Infrastructure** (GI) as *"the **network of natural and semi-natural features, green spaces**, rivers and lakes... It is a natural, service-providing infrastructure that is often more cost-effective, **more resilient and more capable of meeting** social, **environmental** and economic **objectives**..."*

123 The Landscape Institute recommends *"local authorities ensure that GI is a core requirement in their policy documents" and "developers be aware of an area's strategic GI goals and appreciate how those goals contribute to mitigating the environmental impacts of new development and creating beautiful places."*

Building with Nature Standards

124 The Building with Nature Standards Framework 2.0 involves twelve Standards, arranged across four groups. There are six Core Standards and three themes, Wellbeing, Water and Wildlife, containing two Standards in each.

125 The six Core Standards underpin the delivery of high-quality green infrastructure through design, planning and development. The Standards in the Wellbeing, Water and Wildlife themes build on this to target specific aspects:

CORE Standards

Standard 1 Optimises Multi functionality and Connectivity
Standard 2 Positively Responds to the Climate Emergency
Standard 3 Maximises Environmental Net Gains
Standard 4 Champions a Context Driven Approach
Standard 5 Creates Distinctive Places
Standard 6 Secures Effective Place-keeping

WELLBEING Standards

Standard 7 Brings Nature Closer to People
Standard 8 Supports Equitable and Inclusive Places

WATER Standards

Standard 9 Delivers Climate Resilient Water Management
Standard 10 Brings Water Closer to People

WILDLIFE Standards

Standard 11 Delivers Wildlife Enhancement
Standard 12 Underpins Nature's Recovery





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