



Green Infrastructure Statement



Client Name: British Land Company PLC
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Tydfil
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SECTION 1

Introduction



1.0 Introduction

1.1 Introduction

- 1.1.1 This report has been prepared by CarneySweeney on behalf of the applicant, The British Land Company PLC. It sets out the proposed Green Infrastructure (GI) enhancements for the development at Cyfarthfa Retail Park, Swansea Road, Merthyr Tydfil, herein referred to as 'the Site'. The proposals are for *"Erection of drive-thru restaurant (Class A3) with associated parking, servicing, landscaping and engineering works"*.

1.2 Purpose, Legislation and Planning Policy

- 1.2.1 The purpose of this Green Infrastructure (GI) statement is to provide an overview of the existing green infrastructure within the application site. The statement also details potential development impacts (in absence of mitigation) and proposed GI enhancements.
- 1.2.2 The definition of Green Infrastructure in Chapter 6 of Planning Policy Wales (Edition 12, February 2024) is as follows:

"Green infrastructure is the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Component elements of green infrastructure can function at different scales and some components, such as trees and woodland, are often universally present and function at all levels. At the landscape scale green infrastructure can comprise entire ecosystems such as wetlands, waterways peatlands and mountain ranges or be connected networks of mosaic habitats, including grasslands. At a local scale, it might comprise parks, fields, public rights of way, allotments, cemeteries and gardens or may be designed or managed features such as sustainable drainage systems. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks".

- 1.2.3 The Environment (Wales) Act 2016 provides a context for the delivery of multi-functional green infrastructure. Its provision can make a significant contribution to the sustainable management of natural resources. Green infrastructure is capable of providing several functions at the same time and as a result offers multiple benefits, for social, economic and cultural as well as environmental resilience and respond to challenges presented by the climate emergency.
- 1.2.4 A Step-Wise Approach is required to be demonstrated in the Green Infrastructure Statement to assess impacts on habitats and species, as set out in Figure 12 of Planning Policy Wales 12 (PPW12) and shown overleaf. These steps will indicate how Net-Benefit-for-Biodiversity is achieved.



1.2.5 The statement has been produced in accordance with requirements outlined in Chapter 6 of PPW 12, which can be summarised as follows:

- **Green Infrastructure (GI):** stronger emphasis on taking a proactive approach to GI, covering cross boundary considerations, with the submission of a proportionate GI statement with planning applications.
- **Net Benefit for Biodiversity and the Step-wise Approach:** further clarity is provided on securing net benefit for biodiversity through the application of the step-wise approach, including the acknowledgement of off-site compensation measures as a last resort, and the need to consider enhancement and long-term management at each step. The use of the GI statement as a means of demonstrating the stepwise approach is made explicit.
- **Trees and Woodlands:** closer alignment with the stepwise approach, along with promoting new planting as part of development based on securing the right tree in the right place. It also specifies that where trees are lost to facilitate development *“Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must preferably be onsite, or immediately adjacent to the site, and at a minimum of at least 3 trees of a similar type and compensatory size planted for every 1 lost”*.

1.2.6 As stated with para 6.2.12 of PPW 12, a green infrastructure statement should be submitted with all planning applications. These are to 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 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”*.



SECTION 2

Site Baseline and Development Impacts



2.0 Site Baseline and Development Impacts

2.1 Site Baseline

- 2.1.1 The application site consists of an existing hard-standing car parking area for the retail park, and an area of amenity landscaping. There are 5no. trees within the red line boundary of the site; 2no. trees are to be retained in situ and 3no. existing trees are proposed to be relocated as they would otherwise be removed as part of the drive-thru development proposals. The trees within the application site and surrounding the site have no Tree Preservation Orders (TPOs), and/or Ancient Woodland is not present on or adjacent to the Site. The site is within the Cyfarthfa Park Conservation Area.
- 2.1.2 The application site is not subject to any nature, biodiversity, or other environmental protection designations such as National Nature Reserves (NNR), Local Nature Reserves (LNR), Special Landscape Area (SLA), Special Areas of Conservation (SAC), Special Protection Areas (SPA) or Site of Specific Scientific Interest (SSSI). The nearest statutory designation is Cwm Glo a Glyndyrys SSSI which is located approximately 700m to the south of the application site.

2.2 Development Impacts

- 2.2.1 The proposals are for the “*Erection of drive-thru restaurant (Class A3) with associated parking, servicing, landscaping and engineering works*”. The drive-thru restaurant and associated works will primarily be built on existing hard standing land but will require the removal of 136.9sqm of existing amenity soft landscaping. The proposals will also involve the relocation of 3 no. existing trees within site.
- 2.2.2 The proposed green infrastructure comprises the provision of 125.2 sqm of new landscaping comprising low level mixed native species shrubs within the retail park, the relocation of the 3no. existing trees, and the installation of 2no. bird boxes. It should be noted that the proposed development will not result in the loss of any trees.

2.3 Net Benefit for Biodiversity and the Step-wise Approach

- 2.3.1 The Proposed Development seeks to follow the Stepwise Approach as detailed within Chapter 6 of PPW12, by implementing the following:
1. **Avoid:** The proposed development footprint lies within an area of previously developed land. Whilst the impact on the existing soft landscaping area is unavoidable, overall there will be no loss of high-quality arboricultural features on site. As previously outlined, the 3 no. existing trees which will be impacted by the development will be relocated within the site.
 2. **Minimise:** by minimising impacts on any existing green infrastructure.



3. **Mitigate:** by relocating the existing trees affected by the development, proposing new low level mixed native species shrubs planting within the retail park and the installation of 2 no. bird boxes.
 4. **Compensation:** by relocating 3no. trees, proposing 125.2 sqm of new low level mixed native species shrubs planting as well as the installation of 2no. bird boxes.
- 2.3.2 The proposed ecological enhancements fit with the DECCA (Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience) Framework by:
1. *Increasing diversity within the local ecosystem*
 2. *Increasing the extent/scale of ecosystems*
 3. *Improving the condition of the ecosystem*
 4. *Improving connections within and between ecosystems*
 5. *Improving ecosystem resilience and adaptability to future pressures*
- 2.3.3 It is therefore considered that the Step-Wise Approach has been followed. Furthermore, there will be a net benefit for biodiversity within the application site through the installation of 2 no. bird boxes on the site.



SECTION 3

Landscape/Habitat, Establishment, Management, Maintenance and Monitoring Scheme



3.0 Landscape/Habitat, Establishment, Management, Maintenance and Monitoring Scheme

3.1 Post submission consultation

3.1.1 Following submission of the planning application, and registration by the Local planning Authority under reference P/26/0115, consultation comments were received from the Council's Ecology Officer. While these comments raised no objection subject to planning condition, the following section sets out some of the information requested with a view to any associated condition being a compliance condition, rather than requiring the submission of further information.

3.1.2 The Ecology Officer's comments sought the following further information:

- A Landscape/Habitat, Establishment, Management, Maintenance and Monitoring Scheme;
- Details of lighting scheme; and
- A Construction Environmental Management Plan – Biodiversity.

3.2 Landscape/Habitat, Establishment, Management, Maintenance and Monitoring Scheme

3.2.1 Following email correspondence in June 2026 it was agreed that adding the following information to the GI Statement would allow a compliance condition to be attached:

Grass seed mix

EL1 Flowering Lawn Mixture (or equivalent) -

<https://wildseed.co.uk/product/mixtures/complete-mixtures/special-habitat-mixtures/flowering-lawn-mixture/>

Ground Preparation

Endeavour to select ground that is not highly fertile and does not have a problem with perennial weeds. Good preparation is essential to success so aim to control weeds and produce a good quality seed bed before sowing. Prepare a seed bed by removing weeds, dig to bury the surface vegetation, harrow or rake to produce a medium tilth, and roll or tread to produce a level firm surface.

Sowing

Surface sow. Seed is best sown in the autumn or spring but can be sown at other times of the year if there is sufficient warmth and moisture. Do not incorporate or cover the seed, but firm in with a roll, or by treading, to give good soil/seed contact.



First Year Management

Control annual weed growth - eg by repeated mowing.

Mow newly sown flowering lawns regularly (every 7 -10 days during growing season) throughout the first year of establishment. Cut to a height of 40-60mm, removing cuttings if dense. Dig out any residual perennial weeds such as docks.

Management Once Established

Mow regularly as a lawn but not too short (25-40mm). To permit flowering, mowing can be relaxed from May. Cut again when the sward gets untidy (after 4-8 weeks). Mowing may be suspended earlier in the year to allow cowslips to flower. Heavy quantities of cuttings should be collected and removed from site.

Translocated trees

The information within the following RHS webpage can be referred to within the GIS - <https://www.rhs.org.uk/plants/types/trees/moving-trees-shrubs>

Management following translocation to Year 15: Growth and continued development

- **Pruning:** Monitor growth. Prune tree for health and aesthetics as needed. Pruning will be used to maintain the desired shape and size, remove dead or diseased wood, and address any structural issues. Heavy pruning can stress the tree, so the tree will be pruned little and often. Removing more than 25% of the canopy at a time will be avoided.
- **Soil and Nutrient Management:** Soil health will be maintained by continuing to mulch annually to improve soil structure, retain moisture, and suppress weeds. Native trees generally do not require heavy fertilization, especially once established, as they adapt to the natural soil conditions. Synthetic fertilisers, pesticides, and herbicides will not be used.

Management Years 15-25: Maturity and long-term care

- **Continued Monitoring:** As the tree matures, will continue to be annually inspected for signs of pests, diseases, or structural weaknesses. Changes in twig growth, leaf size and number, dieback in the crown, and signs of decay will be noted.
- **Specialized Pruning:** If necessary, a professional arborist for specialized pruning techniques like crown raising or dead wooding will be commissioned to address specific issues or maintain the tree's health and appearance.



- Respecting Natural Processes: The natural aging process of the tree will be considered. Older trees may develop features like stag heads (dead outer branches) which can be a natural part of their health and can support wildlife.
- The tree will be replaced if it fails or dies within five years of translocation.

Management

Management will be undertaken for 25 years or for the lifetime of the development.

BL Merthyr Limited owns the retail park and administers the service charge for British Land. BL Merthyr Limited will be responsible for the management and its funding.

Bird box

The proposed bird boxes will be the '1B Schwegler Nest Box' - 32 mm hole model

(or equivalent): <https://www.nhbs.com/1b-schwegler-nest-box>

3.3 Lighting Scheme

- 3.3.1 While the Ecology Officer's comments sought details of internal and external lighting to "demonstrate dark zones at the boundaries", it is not considered that internal lighting is within the remit of the planning system.
- 3.3.2 The existing c8m lighting columns located around the outside edge of the existing car park (and outside of the submitted application site boundary) will remain in situ, such that "demonstrating dark zones at the boundaries" will likely be impossible and is certainly unreasonable. These existing lights also mean that additional external lighting is likely to be very limited indeed and possibly unnecessary.



- 3.3.3 Given the baseline condition adjacent to but outside the site boundary, we do not consider a lighting condition to be necessary, nor that achieving dark zones at the boundaries is reasonable or possible. Should the LPA disagree and consider a lighting condition to meet the Circular tests of reasonableness and necessity, we would ask that no reference is made to achieving dark zones at the boundaries of the site and, moreover, that the condition be triggered in the event that external lighting is required (eg 'Prior to installing additional external lighting...').



3.4 Construction Environmental Management Plan – Biodiversity

- 3.4.1 The wording suggested for the CEMP-B condition was not considered to fully recognise the baseline situation at the site, namely the presence of a hard landscaped car park. References to 'biodiversity features and protected species' and 'biodiversity protection zones' was not considered proportionate or necessary.
- 3.4.2 Following email correspondence in June 2026 it was recognised that nesting birds are legally protected and that, as there are trees which will be translocated onsite, nesting birds could be present. A condition to avoid tree translocation within nesting season without oversight of a suitably qualified ecologist was agreed to be all that is required.



SECTION 3

Conclusion



4.0 Conclusion

4.1 Conclusion

- 4.1.1 This Green Infrastructure Statement, prepared by CarneySweeney on behalf of British Land Company PLC addresses the proposed drive-thru restaurant with associated parking, servicing, landscaping and engineering works at Cyfarthfa Retail Park, Swansea Road, Merthyr Tydfil.
- 4.1.2 The site baseline assessment confirms that the application is within a conservation area and comprises of an existing hard-standing car parking area and soft landscaping area with no Tree Preservation Orders (TPOs), or Ancient Woodland present on or adjacent to the site. The site is not subject to any statutory nature, biodiversity, or environmental protection designations.
- 4.1.3 In accordance with the requirements of Chapter 6 of Planning Policy Wales 12, which mandates a proactive approach to Green Infrastructure and securing a net benefit for biodiversity, the proposed development implements specific Green Infrastructure enhancements. The primary measures outlined are the relocation of 3no. existing trees, 125.2 sqm of low level mixed native species shrubs, and the installation of 2no. bird boxes. Details and management prescriptions are set out in Section 3.
- 4.1.4 These proposals demonstrate adherence to the Step-Wise Approach, as detailed in PPW 12, by actively avoiding impacts on existing green infrastructure. The ecological enhancements are also aligned with the DECCA (Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience) Framework, aiming to increase diversity and extent, improve the condition of the local ecosystem, and enhance connections and resilience within and between ecosystems.
- 4.1.5 Therefore, it is concluded that the proposed development, incorporating the specified green infrastructure measures, will deliver a net benefit for biodiversity within the ownership boundary, without negatively impacting existing green infrastructure.