GI STATEMENT

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ASESSMENT AGAINST POLICY -PLANNING POLICY WALES: STEPWISE APPROACH AND GREEN INFRASTRUCTURE STATEMENT

On the 11th October 2023, ahead of PPW12 being published, the new Chapter 6 came into force with immediate effect. Net benefit must be secured via planning applications using the step-wise approach, including the acknowledgement of off-site compensation measures and the need to consider enhancement and long- term management. Green Infrastructure Statements will be used to demonstrate the step wise approach. The following information will be used in order to show compliance with policy.

The Environment (Wales) Act, the Well-Being of Future Generations Act and the Chief Planner's letter frame biodiversity with respect to its contribution to achieving ecosystem resilience. Natural Resources Wales (NRW) has developed a framework for evaluating ecosystem resilience based on five attributes and properties specified in the Environment (Wales) Act. This is referred to as DECCA: Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience. The attributes provide a framework for considering the state of ecosystem resilience in Wales and can be applied across different habitats and land uses and for a range of different scales. NRW works to the definition of ecosystem resilience published in its State of Natural Resources Report in 2020, which is: "An environment that can respond to pressures by resisting, recovering or adapting to change; and is able to continue to provide natural resources and benefits to people."16 When assessing planning applications, Planning Policy Wales

instructs planning authorities to take account of and promote the resilience of ecosystems, in particular the five attributes of ecosystem resilience. The DECCA attributes are explained further in NRW's Terrestrial and freshwater Resilient Ecological Networks: a guide for practitioners in Wales17 , but as a broad summary, the definitions are as follows:

• Diversity: maintaining and enhancing diversity at every scale, including genetic, structural, habitat and between-habitat levels. This supports the complexity of ecosystem functions and interactions that deliver services and benefits.
• Extent: incorporating measures which maintain and increase the area of semi-natural habitat/features and linkages between habitats. In general, smaller ecosystems have reduced capacity to adapt, recover or resist disturbance.
• Condition: The condition of an ecosystem is affected by multiple and complex pressures acting both as short term and longer term types of disturbance. Both direct and wider impacts should be considered, for example avoiding or mitigating pressures such as climate change, pollution, invasive species, land management neglect etc. • Connectivity: This refers to the links between and within habitats, which may take the form of physical corridors, stepping stones in the landscape, or patches of the same or related vegetation types that together create a network that enables the flow or movement of genes, species and natural resources. Developments should take opportunities to develop functional habitat and ecological networks within and between ecosystems, building on existing connectivity.

• Aspects of ecosystem resilience (adaptability, recovery and resistance): ecosystem resilience is a product of the above four attributes. Adaptability, recovery and resistance to/from a disturbance are defining features of ecosystem resilience.

1.0 Background to the site

The site refers to a full planning application for an extension to 11 Perrott Street.

The site is a former job centre.

A walkover and bat survey was undertaken by BE Ecological LTD in 2025. This document should be read in conjunction with the bat survey prepared by BE Ecological Ltd.

Originally a PEA was requested by the county ecologist, however, there is currently nothing on the site to survey as a result of ongoing works to the garden, presumably to create access to the building as below.

2.0 Existing Green Infrastructure

Green infrastructure features currently found within the site boundary are unknown. However, google earth imagery reveals that the area was likely to have comprised of scrub and early successional species such as willow, bramble, nettle, ash and buddleia.

Construction phase mitigation measures for bats are outlined in the bat survey conclusions

Direct habitat loss implications within the development site can be limited if compensatory planting can be incorporated within the site plans.

The following relevant enhancement measures are recommended and have been incorporated into the proposals:

- integrated bird and bat boxes into the building providing additional habitat for species
- use of native species within the soft landscaping works
- suitable long-term management of soft landscaping to ensure spaces are useful to wildlife

3.0 Step wise approach

Step 1- Avoidance- Impacts cannot be avoided on all existing habitats due to the size of the development and the need to extend the site and due to the fact the existing garden is already cleared.

Step 2- Minimise- Impacts have been minimised by mitigating bat roosts and mitigating lighting.

Step 3- Mitigate/Restore- Mitigation will be via appropriate method statements to ensure no harm to protected species Any site lighting will conform to the following guidance to prevent any indirect impacts on foraging bats https://theilp.org.uk/publication/guidancenote-8-bats-and-artificial-lighting/ .

Step 4- Compensation on site- Wildflower meadows will be planted within the landscaped areas. The wildflower areas will be seeded with Emorsgate EM2, and EL1. The combination of EM2 and EL1 will create a net gain for floral species In addition to the above any amenity grassland will be seeded with EL1 – Flowering Lawn Mixture, this contains slow growing grasses with a selection of wild flowers that respond well to regular short mowing.

A native hedgerow will be planted within the garden of the property.

4.0 MANAGEMENT OF HABITATS

EL1 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. To prepare a seed bed first remove weeds using repeated cultivation. Then plough or 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 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. The seed must be surface sown and can be applied by machine or broadcast by hand. To get an even distribution and avoid running out, divide the seed into two or more parts and sow in overlapping sections. 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
The wild flower and grass species in this mix are perennial; they will be slow to germinate and grow and will not usually flower in their first growing season. There will often be a flush of annual weeds from the soil in the first growing season. This annual weed growth is easily controlled 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. This will gradually develop a good sward structure, help maintain balance between faster growing grasses and slower developing wild flowers, and control annual weeds. 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 late June. 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.

EL1 is a complete mix composed of 20% wild flowers and 80% slow growing grasses (by weight). The flower and grass components are also available to order separately as EL1F for the flower component and EG1 for the grass component. For quicker establishment of grass cover EL1 may be sown with an additional 10g/m2 EG1 or lawn mixtures EG21 or EG22. Higher grass sowing rates will however reduce the time and space available for flower establishment, especially in good growing conditions.

EM2

Description This meadow mixture contains species that are characteristic of traditional meadows across a wide range of soil types. This mixture is compliant with the following Environmental Stewardship options: • Sustainable Farming Incentive (SFI): IPM2 Flower-rich grass margins, blocks, or in-field strips • Countryside Stewardship (CSS): AB8: Flower-rich margins and plots

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. To prepare a seed bed first remove weeds using repeated cultivation. Then plough or dig to bury the surface vegetation, harrow or rake to produce a medium tilth, and roll, or tread, to produce a firm surface. Sowing 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. The seed must be surface sown and can be applied by machine or broadcast by hand. To get an even distribution and avoid running out divide the seed into two or more parts and sow in overlapping sections. 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

Most of the sown meadow species are perennial and are slow to establish. Soon after sowing there will be a flush of annual weeds, arising from the soil seed bank. These weeds can look unsightly, but they will offer shelter to the sown seedlings, are great for bugs, and they will die before the year is out. So resist cutting the annual weeds until mid to late summer, especially if the mixture contains Yellow Rattle, or has been sown with a nurse of cornfield annuals. Then cut, remove and compost. Early August is a good time. This will reveal the young meadow, which can then be kept short by grazing or mowing through to the end of March of the following year. Dig out any residual perennial weeds such as docks.

Management Once Established

In the second and subsequent years EM2 sowings can be managed in a number of ways which, in association with soil fertility, will determine the character of the grassland. The best results are usually obtained by traditional meadow management based around a main summer hay cut in combination with autumn and possibly spring mowing or grazing. Meadow grassland is not cut or grazed from spring through to late July/August to give the sown species an opportunity to flower. After flowering in July or August take a 'hay cut': cut back with a scythe, petrol strimmer or tractor mower to c 50mm. Leave the 'hay' to dry and shed seed for 1-7 days then remove from site. Mow or graze the re-growth through to late autumn/winter to c 50mm and again in spring if needed.

5.0 ENHANCEMENT USING THE DECCA FRAMEWORK

To build resilient ecological networks the following enhancements are proposed:

Integrated bird boxes 1no Enhancement
Integrated bat boxes 1no Enhancement

Boxes will be integrated into the new buildings. Please see the bat report undertaken by BE Ecological Ltd.

6.0 Monitoring

Monitoring of habitats species at the Site shall be undertaken to ensure their continued value during the operation of the Development. At the end of year 5 an ecological audit of habitats shall be undertaken by a suitably qualified ecologist to ensure that those habitats which have been retained and created are meeting the standard they should be. The general condition monitoring should be undertaken in the form of an annual review. As part of the annual review a letter report should be produced. As a minimum, this should summarise those key management works which have been undertaken during that period, together with an assessment against those aims and objectives and management specification. Any observations with regard to general habitat condition, including deterioration of habitats should be noted, together with any recommendations for any remedial measures if required. The council and ecologist should be notified of any recommended remedial measures so that these can be agreed and implemented at the earliest opportunity and ensure that targeted habitat conditions would still be met.

The proposed scheme acknowledges the requirement to achieve a Net Benefit for Biodiversity and from the beginning this has been built into the planning of the project. It is recognised that

the footprint of the scheme has likely removed an area of scrub. The applicant aims to deliver biodiversity enhancements at the local scale by offering the enhancements stated above on the site. The site will be subject to enhancements along with long term appropriate management. As result of the ecological measures within this report, it is expected that there will be a demonstrable net benefit for biodiversity. The habitats to be impacted have been identified as being of relatively low value. All habitats will be retained/created/enhanced on site.

The proposals meet the recent changes to Chapter 6 of Planning Policy Wales 12 February 2024 which requires a proactive approach to green infrastructure conservation, restoration and enhancement and the securing of a net benefit for biodiversity through use of the step-wise approach and DECCA framework to provide mitigation and enhancement in addition to a commitment for long-term management of the biodiversity resource.

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