
Title:	Green Infrastructure Statement
Document Reference:	11145 GIS
Proposed Development:	Change of Use to Renewable Energy Facility, Construction of Flue and Ancillary Works
Prepared By:	Technia Environment and Planning Limited
Client:	Merthyr Biomass Ltd
Site:	Plot 5, Pengarnddu Industrial Estate, Dowlais, Merthyr Tydfil, CF48 2TA
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1 INTRODUCTION

1.1 Background and Context

101 This Green Infrastructure Statement accompanies an application submitted by Technia Environment and Planning Limited (TEPL) on behalf of Merthyr Biomass Ltd (the Applicant) to permit development at Plot 5, Pengarnddu Industrial Estate, Dowlais, Merthyr Tydfil, CF48 2TA.

102 Drawing 11145 - 000 - A shows the location of the site.

1.1.1 Development Overview

103 The Applicant seeks planning consent for:

“Change of Use to Renewable Energy Facility, Construction of Flue and Ancillary Works.”

104 The proposed development site is situated within an existing Waste Transfer Station/Recycling Facility.

105 The purpose of the development will be to produce renewable heat for adjacent buildings/businesses and to dry biofuel.

1.2 Green Infrastructure

106 The Landscape Institute defines Green Infrastructure (GI) as *“the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect villages, towns and cities. Individually, these elements are GI assets, and the roles that these assets play are GI functions.”*

107 GI can be considered as elements influencing an area at three scales:

- Landscape scale - wetlands, woodlands, heathlands, shorelines, rivers and floodplains, mountains, national parks and other designated areas.
- Local scale - parks, fields, footpaths/Public Rights of Way (PRoWs), cycle ways, common land, open access land, canals, allotments, cemeteries, landscaped areas and gardens.
- Small scale - individual features including street trees, roadside verges and hedges, village greens, swales and ditches, ponds, private gardens and green roofs.

108 In this way, small or local scale projects incrementally add to the bigger landscape-scale picture, and collectively contribute to maintaining and enhancing a network of green infrastructure.

109 When appropriately planned, designed and managed, GI has the potential to deliver a wide range of benefits for people and wildlife, including mitigating and adapting to the effects of climate change.

1.3 Green Infrastructure and the Planning Process

110 Edition 12 of Planning Policy Wales (PPW), the latest version of the framework published in February 2024, mandates a duty to conserve and enhance biodiversity. It also introduces a requirement for all planning applications to be accompanied by a GIS. Specifically, paragraph 6.2.12 states that:

“A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive 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.”

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1.4 This Report

- 111** PPW requires a GI statement to be submitted with all planning applications. This document fulfils this requirement and is considered to be proportionate to the scale and nature of the development proposed. It considers the site in the context of the surrounding area, identifies opportunities for enhancing biodiversity and describes how green infrastructure has been incorporated into the proposal.
- 112** Furthermore, it sets out the ‘Stepwise Approach’ which has been applied and used to inform development proposals. Namely, how the proposals have been developed to:
1. Avoid damage to biodiversity and green infrastructure assets
 2. Minimise damage to biodiversity and green infrastructure assets
 3. Mitigate damage to biodiversity and green infrastructure assets
 4. Compensate damage to biodiversity and green infrastructure assets
- 113** This document is intended to provide a high-level summary of the proposals for achieving a net benefit for biodiversity as a result of the development.

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2 EXISTING GREEN INFRASTRUCTURE

2.1 National Context

2.1.1 National Landscape Character

201 The site is located to the east of Natural Resources Wales' National Landscape Character Area NLCA 37: South Wales Valleys. The Landscape Habitat area provides *"some of Wales' most widely known and iconic national images"*. While the site is not specifically referenced in the descriptive key characteristics, the most applicable characteristics are: *"Contrast of urban valley activity next to quiet uplands – e.g. busy roads, new developments, traffic noise, night lighting, versus the adjacent wilder, remoter, quieter uplands"* and *"ribbon urban and industrial areas in valleys"*.

2.2 Regional Context

2.2.1 Area Statement

202 Under Part 1 of the Environment (Wales) Act 2016, Area Statements were produced by Natural Resources Wales (NRW) and cover the marine and six land regions across Wales. The South Central Wales Area Statement (SCWAS) covers Merthyr Tydfil, Bridgend, the Vale of Glamorgan and Rhondda Cynon Taff, as well as Cardiff. It is the most densely populated of the seven areas, representing 29% of total population and 6% of Wales's landmass. Consequently, the area statement is dominated by a desire to bridge the urban and the natural environments.

203 There are five key themes identified within the area statement, two of which, Building resilient ecosystems and Connecting people, are the cornerstones that provide a sustainable management framework for natural resources in order to address the challenges of the three remaining themes; Working with water, Improving our health and Improving our air quality.

204 The Area Statement goes on to identify seven key ecosystems in South Central:

- Coastal
- Freshwater
- Grasslands
- Peatlands
- The Valleys
- Urban
- Woodlands

205 NRW's approach is to encourage the Sustainable Management of Natural Resources to have the highest level of resilience appropriate to the desired land use. This will require different action in different places.

2.2.2 Supplementary Planning Guidance

2.2.2.1 SPG 4 Sustainable Design

206 Chapter 10 of SPG 4 expands upon Merthyr Tydfil County Borough Council's (MTCBC) existing planning policy on GI. The document refers to policies contained in the previous adopted LDP 2006 – 2021, however, much of the principles and guidance within the document remains relevant. Until the LPA review and consult on draft SPG, in light of the updated policy framework provided by the replacement LDP 2016 – 2031, the SPG remains until replaced or otherwise withdrawn.

207 The guidance highlights the multifaceted benefits of GI and outlines practical 'green' measures that can be incorporated into new developments including, green roofs, street trees and SuDS. The document further highlights that opportunities should always be taken to retain existing GI features including trees and hedgerows wherever possible.

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2.2.3 Data Maps

208 Natural Resources Wales maps provide information relating to priority ecological networks, habitat networks, ecosystem resilience, Tranquil Areas and related themes. These were reviewed and have provided background and context to the assessment at a regional and local level.

2.2.4 LANDMAP

209 LANDMAP is an all-Wales GIS (Geographical Information System) based landscape resource, where landscape characteristics, qualities and influences on the landscape are recorded and evaluated into a nationally consistent data set.

2.2.4.1 Landscape Habitats

210 Within the Landscape Habitat data, the site lies within the Landscape Habitat Aspect Area MRTHRLH007, summarised as *“dry (relatively) terrestrial habitats, grassland & marsh and acid grassland.”* It should be noted that the key features that define this area's biodiversity character are derived from the large area occupied by Gelligaer, Merthyr and Mynydd y Capel Commons.

211 The dataset identifies the present Phase 1 habitat types as:

- Unimproved Acid Grassland;
- Semi-improved Acid Grassland;
- Improved Grassland;
- March Grassland; and
- Bracken.

212 Biodiversity is notably influenced by ponds, hedgerows, earth banks and rock outcrops. The area is assessed as being of high value as *“the aspect contains a different mosaic of valuable habitat”*.

213 Land management activities in the area consist mainly of stock grazing and mowing. The principal management recommendations for the area include conserving and enhancing semi-natural habitats, with medium term recommendations to modify spoil reclamation methods to enhance biodiversity opportunities and designate best semi-natural habitats as SINCs.

2.2.4.2 Geological Landscape

214 The site is located within Geological Landscape Aspect Area MRTHRGL008. The area is characterised by the NW-SE Penydarren and Dowlais Faults and extensive boulder clay cover, made ground, with numerous disused shafts and adits, waste tips and reclaimed opencast coal mines.

215 The area is assessed as being of *moderate* value, featuring a productive coal formation, many old coal and iron workings and large areas of made and reclaimed land.

216 Management recommendations emphasise the long-term implementation of plans to conserve/restore worked land and restore degraded land.

2.2.4.3 Visual and Sensory

217 The site is situated in Visual and Sensory Aspect Area MRTHRVS122, the quality of the aspect area landscape is variable and the pattern of development has historically been controlled by the exploitation of local minerals and related industrial development, resulting in strong visual contrasts between areas surrounding the town centre and random housing developments among the serried ranks of stone-built housing in Dowlais.

218 The area is assessed as being low value of poor condition, *“setting for wider more interesting landscapes of upland and coast”*.

219 Recommended management strategies include immediate improvement and maintenance of existing open spaces and integrating new and existing development. In the medium term, management strategies include identifying and conserving heritage landscapes, managing roadside areas to connect with the countryside and enhancing river corridors to improve access and use.

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2.2.4.4 Historic Landscape

- 220 The site is located in Historical Landscape Aspect Area MRTHRHL005, characterised by a wide range of features from various periods. The area holds significant archaeological interest, with notable buildings, structures, industrial archaeology and documentary evidence.
- 221 The area is assessed as being *outstanding* value. The data set states: *“despite impacts from extensive recent land reclamation and the expansion of 20th century social housing, the town and its environs, together with the extant remains of the ironworks at Cyfarthfa, Dowlais and Ynysfach, constitute what has been characterised as “a potent example of an internationally renowned industrial landscape of the 18th and 19th centuries”.*
- 222 Principal management recommendations include the long-term retention of distinctiveness of constituent communities and the immediate term management of enhancing accessibility and display of transport links.

2.2.4.5 Cultural Landscape

- 223 The site lies within Cultural Landscape Aspect Area MRTHRCLS003. The area is assessed as having a strong sense of place/local distinctiveness, it is however largely assessed as low against the criteria within the data set, including scenic quality and character.

2.2.5 Tranquil Areas Wales

- 224 The Tranquil Areas Map of Wales shows zones of tranquillity. The site lies within Zone B, an area identified as experiencing significant disturbance.

2.3 Local Context

- 225 There is no available data regarding the site's ecological characteristics or its ability to support protected species. Given the site and immediate surrounding area is largely laid to concrete or compacted stone hardstand, and frequently trafficked by HGVs and large plant, any ecological value is likely to be very limited.
- 226 With the exception of Merthyr Common, to the north, ecological infrastructure is limited to a small number of hedgerows and small trees within the wider industrial estate.
- 227 The Mynyddoedd Llangynidr a Llangatwg, Cefn yr Ystrad a Chomin Merthyr Site of Special Scientific Interest (SSSI) is located approximately 37m to the north of the site. The boundary of the SSSI was revised in 2025 and covers an area of approximately 7,000 Ha. The SSSI consists of an open landscape, noted to be of international importance for its karstic geomorphology.

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3 GI STRATEGY

3.1 Vision

301 The overall vision is to:

- Safeguard and enhance the function of existing GI;
- Enhance ecological resilience by improving the condition, increasing the extent and/or improving connectivity between areas of GI within the site and to the wider landscape; and
- Consider opportunities for habitat protection and enhance the site for protected and priority species.

3.2 Risks

302 A number of risks have been identified that could impact the biodiversity value of the site, as well as potentially impacting upon the ecological functionality of the site and wider landscape. These risks include:

- Disturbance from lighting, noise and regular human presence, although no significant additional impact is likely to occur from the proposed development.

3.3 Opportunities, Constraints and GI Strategy

Opportunity	Constraint	GI Strategy
Safeguard and strengthen biodiversity within the site to build ecosystem resilience.	Limited area within the site boundary. GI predominantly outside of the site to the north.	Protection of existing GI assets during construction and operational lifetime; notably the trees adjacent to the site's northern boundary (on land not owned by the Applicant). Deliver species-specific initiatives e.g. additional nesting and roosting opportunities for birds and bats utilising nearby trees for foraging.
Utilise buildings and structures for GI.	Existing building fabric limits scope for GI.	Utilise existing buildings for GI enhancement features.
Improve health and well-being and social cohesion.	Site not accessible by members of the public (other than customers and visitors).	Ensure GI development is not detrimental to local residents.

Table 1. Opportunities, Constraints and GI Strategy

3.4 Application of Stepwise Approach

3.4.1 Avoid

303 The initial site layout was considered with the objective to avoid the construction on any areas of more notable ecological value within the site, and to use an existing building if feasible to do so.

304 This resulted in the development being undertaken within an existing building, rather than constructing a new building elsewhere within the site.

3.4.2 Minimise

305 External works to the existing building are limited to the installation of the flue. This reduces the potential for disturbance to the surrounding environment, particularly the trees adjacent to the site's northern boundary.

306 No changes to the bat-friendly lighting (approved in planning reference P/24/0232) are proposed.

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3.4.3 Mitigate

307 No formal ecological mitigation measures are required due to the nature of the development. The works are low-impact, with all primary infrastructure located internally and limited external works.

3.4.4 Compensation

308 Due to the scale and design of the development, off-site compensation measures are not required.

3.4.5 Enhancement

3.4.5.1 Bird Boxes

309 In accordance with recently approved planning permission (Planning ref. P/24/0232), in advance of any works, two bird boxes (1B Schwegler Nest Boxes or similar) are to be installed on the northern elevation of the building.

310 To complement these measures, in advance of any works, an additional two bird boxes (1B Schwegler Nest Boxes or similar) are proposed to be installed on the western elevation of the building. The boxes will be installed two to five metres high, out of the reach of predators such as domestic cats.

311 The specifications and design of the bird boxes is provided in Figure 1 below.

1B Schwegler Nest Box		
Material	Schwegler Woodcrete	
External Dimensions	26 cm x 17cm x 18 cm	
Colour	Brown	
Weight	3.6 kg	
Material	Schwegler Woodcrete	
Siting and Position	On western elevation of building 2 – 5 m from ground level.	

Figure 1. Bird Box Specifications.

3.4.5.1 Bat Box

312 In advance of any works, one bat box; a Large Multi-Chamber Woodstone Bat Box (or similar design) is proposed to be installed on the northern elevation of the building. The box will be installed two to five metres high, out of the reach of predators such as domestic cats.

313 The specifications and design of the bat box is provided in Figure 2 below.

Large Multi Chamber Woodstone Bat Box		
Material	Brown Woodcrete	
External Dimensions	27.5 cm x 15 cm x 16 cm	
Colour	Brown	
Weight	4.5 kg	

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Siting and Position	On northern elevation of building 2 – 5 m from ground level.		

Figure 2. Bat Box Specification

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4 CONCLUSION

- 401 The proposal identifies important features within the site and wider area as a baseline for the development of Green Infrastructure (GI) proposals.
- 402 The approach taken by the developer has ensured that the step-wise approach has been followed, and in particular, that the development within more valuable habitats on site has been avoided wherever possible.
- 403 Diligent planning and design has informed the provision of mitigation measures and ensured that an appropriate mix of Green Infrastructure (given the relatively small scale and minimal impact of this development) has been included in the proposals. The GI proposals will contribute to the functioning and enhancement of the local area.

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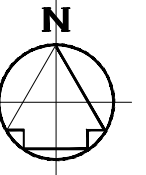
DRAWINGS

- 11145 – 000 – A Location Plan
- 11145 – 000 – C Site Plan
- 11145 – 000 – D Ecological Enhancement Plan

LEGEND

SITE BOUNDARY

OWNERSHIP BOUNDARY



209000m

208900m

208800m

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AMENDMENTS	REV REF	DETAILS	DATE	MADE BY	CHKD BY	 TECHNIA ENVIRONMENT AND PLANNING LIMITED UNIT 1 FOXES LANE, OAKDALE BUSINESS PARK BLACKWOOD, CAERPHILLY, NP12 4AB TEL: 02921 900400 EMAIL: PLANNING@TEPL.EU	MERTHYR BIOMASS LTD				Drawn	SCW	Scale
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