

Rhydycar West, Merthyr Tydfil Green Infrastructure Statement

April 2024 (version 4)



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On behalf of:

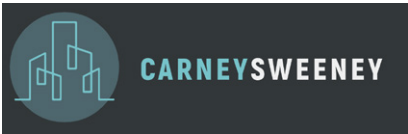


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01 Introduction

Scope

Tir Collective is instructed by **Marvel Ltd** to prepare this **Green Infrastructure Statement**, which relates to an Outline Planning Application submitted to Merthyr Tydfil County Borough Council (MTCBC) at 'Rhydycar West'. The proposed development is a leisure resort:

"a mixed leisure development comprising Indoor Snow Centre (up to 39,200 sq m), Waterpark (up to 7,500 sq m), Indoor Activity Centre (up to 9,000 sq m), Outdoor Activity Centre, Hotel Accommodation (up to 418 bedrooms), Woodland Lodge Accommodation (up to 30 units), car parking (up to 830 spaces) and associated earthworks, access, drainage, servicing and utilities connections/infrastructure."

This report provides a **Green Infrastructure(GI) Statement**. It includes a summary of existing green infrastructure at the site, based on survey work carried out in advance of and during the design development for the proposals. The GI Statement also explains how the design of the proposed development is based on a step-wise approach, as defined in the Environment (Wales) Act 2016.

Background

The baseline conditions of the site are described in detail within the Environmental Statement submitted with the planning application. The EIA scoping process identified a range of topics to be included. The environment topics of relevance to green infrastructure are Landscape, Ecology and Arboriculture.

Ecology

The ecological resources within and adjoining the Application Site have been documented to an unusually high level of detail in the course of intensive survey campaigns since 2015, undertaken by **Bioscan**. The baseline conditions on the site, and the existence and importance of ecological factors, are therefore well known. The Application Site represents part of a wider landholding under the control of the applicant that includes the 181.7ha Cwm Glo a Glyndyrys SSSI. That same landholding is also almost entirely underlain by non-statutory Site of Importance for Nature Conservation (SINC) designations.

The land upon which the rest of the development is focused, whilst outside the SSSI, is subject to SINC designations, and contains representations of many of the same habitats and some of the same species. This includes waxcap fungi, priority grassland, heathland and woodland habitats and a suite of notable species.

Both the location of the development within the wider landholding and the detailed positioning and extent of the Application Site have been configured through numerous design iterations in order to firstly avoid impact on the SSSI (**Step 1** of the Stepwise approach) and then to ensure that overlap with the designated Cwm Glo a Glyndyrys SSSI is restricted to the absolute minimum necessary (**Step 2** of the Stepwise approach). This has seen the quantum of SSSI land affected by the proposed development incrementally reduced over time in order to reduce impacts on the statutory site. Some SSSI landtake remains unavoidable, however, in order to deliver the indoor snow centre, which is the 'wholly exceptional' central focus of the scheme. In total, a direct landtake of 6ha of the SSSI is anticipated, which represents a little over 3% of the total land area of Cwm Glo a Glyndyrys SSSI.

The parts of the SSSI affected by the proposed development do not contain any significant representations of the primary features of special habitat or mycological interest underpinning the designation. Thus, it is considered that the direct loss of SSSI land to the development will have little or no impact on the national and international mycological importance of the SSSI, and will not result in the direct loss from the SSSI designated area of any substantive quantum of the cited marshy grassland, acid grassland or heathland habitats, including those supporting the site's current population of marsh fritillary.

Consequently, it is primarily the secondary interest features of the SSSI that will be directly affected, in particular woodland, scrub and 'ffridd' habitats of a type falling outside the scope of the primary interest features.

The focus of mitigation and compensation will be outside the Application Site. In the first instance this will be in the wider landholding where the opportunity to secure optimised management of both SSSI and non-SSSI resources will be taken. In addition, there will be enhancement of habitats complementary to the SSSI interest features (in particular lowland meadow and marshy grassland) on additional land the applicant has agreed an option to purchase at Blaencanaid Farm. Significant effort has been

expended by the applicant over a number of years in searching for and securing an option on appropriate compensation land. This has included region-wide searches, extensive discussions with NRW and other landowners. Blaencanaid Farm, due to its proximity (it adjoins the Cwm Glo a Glyndyrys SSSI) and the nature of the habitats there represents the optimum solution. The secured beneficial management and enhancement of land at Blaencanaid Farm (itself also a SINC) will improve the deliverability of optimised grazing management within the balance of the Cwm Glo a Glyndyrys SSSI and secure complementary habitats to the retained SSSI and SINC lands, improving future ecosystem resilience.

Landscape

A Landscape and Visual Impact Assessment (LVIA) has been undertaken by Chartered Landscape Architects at **Tir Collective** to assess the effects of the proposed development on the landscape and visual amenity. The methodology used for reviewing the landscape character and visual amenity of the site and surrounding area was based on the recommendations in Guidelines for Landscape and Visual Impact Assessment 3rd Edition, published by The Landscape Institute and the Institute of Environmental Management & Assessment in 2013 (GLVIA3).

The LVIA reviewed LANDMAP assessments and relevant national and local policy information. The LANDMAP aspect of most relevance to green infrastructure is the 'Landscape Habitats' layer. The majority of the site is located in the most southerly extent of aspect area MRTHRLH008, which is classified as Dwarf Shrub Heath (Level 3). The key features that define the area's biodiversity character (question LH24) are those of an "area based on semi-uplands, colliery spoil and tips west of town". The overall evaluation (question 45) for the area is High, as the aspect area is "an area which contains very special habitat of marshy grassland, species-rich neutral grassland and lowland acid grassland, also contains woodland which add value also".

The site is located in the Merthyr Tydfil West Flank Special Landscape Area (SLA). The site also contains a network of public rights of way. The Landscape and Visual Impact Assessment has identified that the site could accommodate the proposed development without resulting in an unacceptable adverse impact on landscape character and visual amenity experienced within the surrounding landscape/townscape.

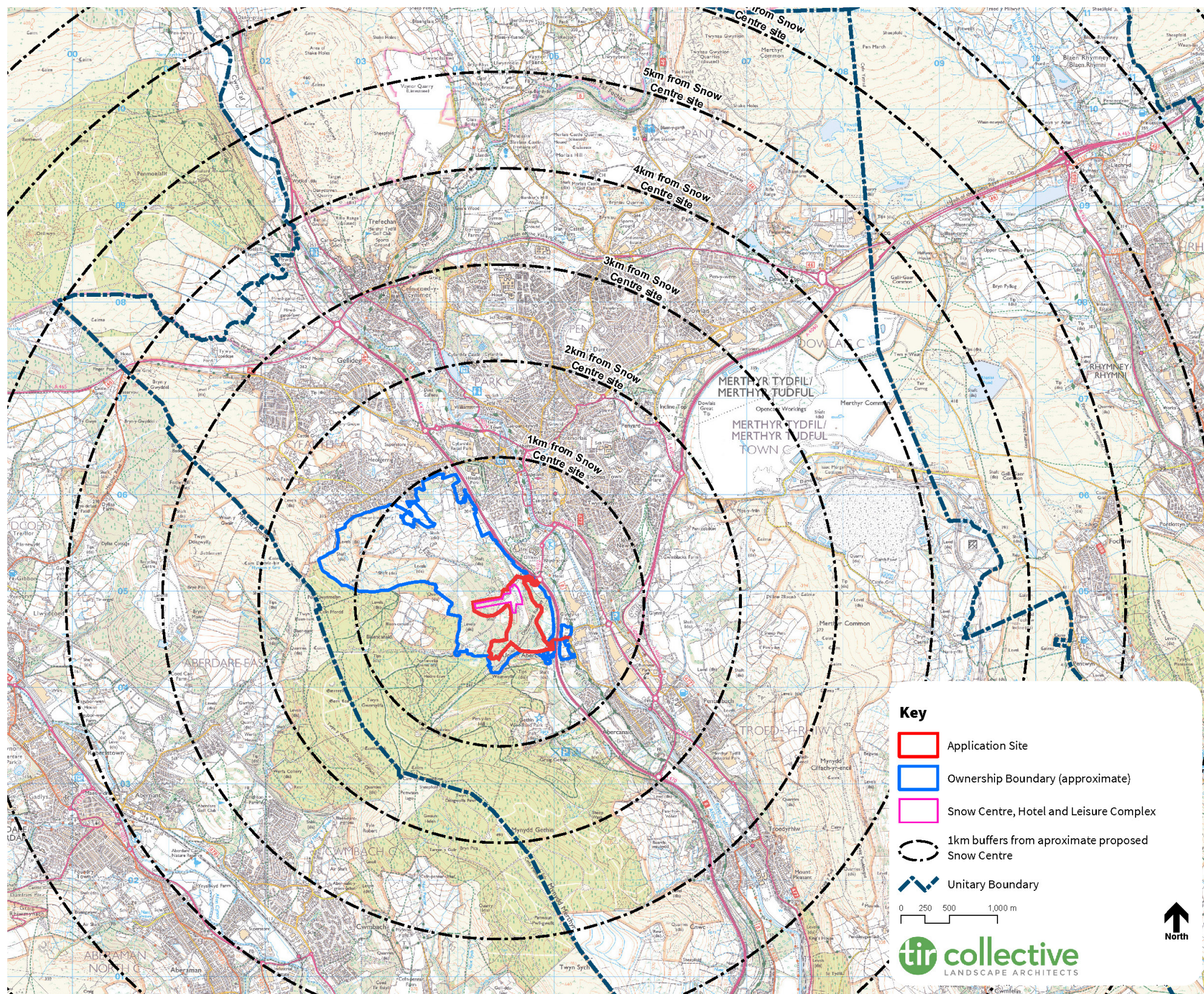


Figure 1: Site Context

Arboriculture

An Arboricultural Impact Assessment has been Prepared by **The Environmental Dimension Partnership Ltd**, November 2022 . The survey identified 372 individual trees and 63 groups of trees, totalling 435 items. Of these 435 items, 153 have been categorised as A, of high quality; 175 have been categorised as B, of moderate quality; and 62 have been categorised as C and are of low quality. In addition, 45 items have been categorised as U and are considered unsuitable.

The Site

The Application site itself occupies a 30.4ha parcel and is located in the southeastern corner of the applicant's wider landholding. It is located on the lower slopes and plateaux of the east-facing flank of the Taff valley to the Southwest of the A470 at the Rhydycar Roundabout. Within the site there are historic mine workings and spoil tips, as well as the remains of a historic canal, leat and railway line features, all of which have since become redundant and fallen into disrepair.

The UK grid reference for the site is SO 04629 05014 (Eastings (304629), Northing (205014)).

The site comprises an extensive area, forming a mix of woodland/grassland on predominantly east and south-east facing slopes. The southern area of the site encompasses a more enclosed woodland area. The Blaen-Canaid Valley lies to the south adjacent to Gethin Wood. The landform undulates with moderate to steep slopes and falls from circa 270m AOD in the west to between 175-200m AOD along the A470 which forms the lower level.

02 Policy Context

Wales Legislation

Well-being of Future Generations (Wales) Act 2015: 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.



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

Environment (Wales) Act 2016: 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**.

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 Policy

Future Wales: The National Plan: The plan provides a strategy for addressing key national priorities through the planning system, including achieving climate-resilience, developing strong ecosystems and improving the health and well-being of our communities. It also embeds the principles of the Well-being of Future Generations (Wales) Act 2015.

The key policy in relation biodiversity and green infrastructure is **Policy 9 – Resilient Ecological Networks and Green Infrastructure**. It states, "action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment."

Planning policy Wales (PPW)

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.

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." **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."

Assessing impacts on habitats and species

Using DECCA



Local Planning Policy

Merthyr Tydfil Replacement Local Development Plan 2016 – 2031

The Merthyr Tydfil Replacement Local Development Plan 2016 – 2031 was adopted on the 29th January 2020. In relation to green infrastructure, **Policy SW11: Sustainable Design and Placemaking** states at item 4 that development will be required to 'contribute to the provision of green infrastructure, including open space in accordance with the Council's standards, sustainable drainage systems where appropriate, and ensure that the County Borough's network of green infrastructure is accessible and connected'.

Paragraph 6.6.14 states that 'Biodiversity enhancement on development sites can be achieved by incorporating green infrastructure features into development proposals. As a minimum, the levels of enhancement should be commensurate with the level of adverse impact and proportionate to the scale of development although opportunities for greater enhancement should be considered wherever possible.

Enhancement features that can be included could comprise: small animal underpasses, bird and bat boxes on new builds, vegetated dark flight corridors, ponds, hedgerows, new planting schemes, and wildlife-friendly sustainable drainage systems. These features not only mitigate and enhance, but also significantly contribute towards sustainability and natural resource planning; ensuring that new developments are 'future-proof' allowing for migration and colonisation in response to climate change. Baseline ecological data will be required to evaluate the level of enhancement achieved.

The LDP is supported by Supplementary Planning Guidance (SPG). SPG Note 5: Nature and Development was published in May 2015 and Supplementary Planning Guidance Note, No 4: Sustainable Design (Adopted July 2013).

Although biodiversity is not the main focus of the sustainable design SPG, it recognises that Sustainable Urban Drainage Systems (SUDS), green roofs and green infrastructure support the enhancement of biodiversity and that such provision is an important consideration in achieving sustainability, through good design, whilst promoting biodiversity.

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

"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." The stepwise 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."

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..."

Guidance

Placemaking Wales Charter

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.

Landscape Institute Green Infrastructure: An integrated Approach, 2013

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..."*

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."* 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.

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.

Building with Nature Standards

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.

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



03 Existing Green Infrastructure

A desktop study and field surveys have been carried out to confirm the green infrastructure features at the site and its surrounding context.

The elements that are considered to form the existing Green Infrastructure (GI) of the site and surrounding context are as follows:

- Trees, woodland and scrub mosaic
- Habitat of ecological value
- Public Rights of Way and public access

The GI elements are described in the following sections, identifying and assessing existing or potentially important habitats or species and ecological connectivity corridors. This has been informed by the desktop studies, field surveys and specialist surveys / reports. It summarises the surveys carried out to identify and assess the GI elements of importance in advance of the Stepwise approach Step 1 – Avoid and Step 2 Minimise.

Trees, woodland and scrub mosaic

The pattern of vegetation at the site and the context of the site to the north is a mosaic of varied habitats that include woodlands that contrasts with areas of grassland. A large part of the site, particularly the southeastern areas and context beyond are covered by woodland. Within the site discrete areas of this woodland have been removed during summer 2022 as a result of the formation of access routes, earthworks and the construction of drainage channels associated with tip-works.

Woodland in the west of the site covered by TPO. Trees within the site are of varying ages from pioneering scrubby woodland to mature and veteran trees. Species of trees also vary from oak and birch to a mixture of alder on the wetter ground.

The A470 Tip is located in the north of the site and extends southwards. This area has a steep east facing slope with a generally level upper part; the periphery is being colonised by birch and scrub while the central part is either grassland or exposed tip material.

On the upper slopes in the northwest of the site the landform slopes steeply to the east and the ground cover consists of tussocky wet grassland with scattered trees, mostly birch with some more mature oak around old areas of relatively shallow, bell pit mine workings. This area is also covered by the Cwm Glo and Glyndyrys SSSI.

An Arboricultural Impact Assessment has been Prepared by **The Environmental Dimension Partnership Ltd**, November 2022. The surveys followed the methodology as set out in the British Standard 5837:2012, refer to **Figure 2: Tree Constraints Plan (Overview)**.

The survey identified 372 individual trees and 63 groups of trees, totalling 435 items. Of these 435 items, 153 have been categorised as A, of high quality; 175 have been categorised as B, of moderate quality; and 62 have been categorised as C and are of low quality. In addition, 45 items have been categorised as U and are considered unsuitable.

Overall, the items identified across the site are primarily category A, of high value and category B, of moderate value. An area of ancient woodland is located to the south-west of the site, a veteran tree in the south of the site and five areas of woodland are protected by a TPO. One veteran tree (T279) has been identified during the survey process located to the south of the site. A veteran tree, by a recognised criterion, shows features of biological, cultural or aesthetic value that are characteristic of, but not exclusive to, individuals surviving beyond the typical age range for the species.

There are a large number of common ash (*Fraxinus* spp.) trees on site in various stages of their life cycle. Ash dieback (ADB), also known as Chalara or Chalara dieback of ash, is a disease of ash trees caused by a fungus called *Hymenoscyphus fraxineus*. ADB causes leaf loss, crown dieback and bark lesions in affected trees. Once a tree is infected the disease is usually fatal, either directly or indirectly by weakening the tree to the point where it succumbs more readily to attacks by other pests or pathogens, especially *Armillaria* fungi, or honey fungus.

It has caused widespread damage to ash populations across Wales, where experience indicates that it can kill young ash trees

quite quickly, while older trees can resist it for a short time, until prolonged exposure or another pest or pathogen attacking them in their weakened state eventually causes them to succumb.

It has been reported that the felling costs to deal with ADB within MTCBC is £2M¹. Many of the trees on site were observed to have symptoms of ADB. It is to be assumed that the majority of the ash trees present on site will be lost, or severely disfigured by the disease.

It is becoming increasingly difficult to assign ash trees a retention category using the BS5837:2012 standards. If clear signs of ADB are found on sites, it is highly likely that all the ash trees on that site will succumb in a relatively short period. It would be unreasonable to consider an ash tree a significant constraint to a site if it is to die within a short period of time.

¹ <https://www.walesonline.co.uk/news/wales-news/merthyr-tydfil-ash-dieback-trees-20880732>

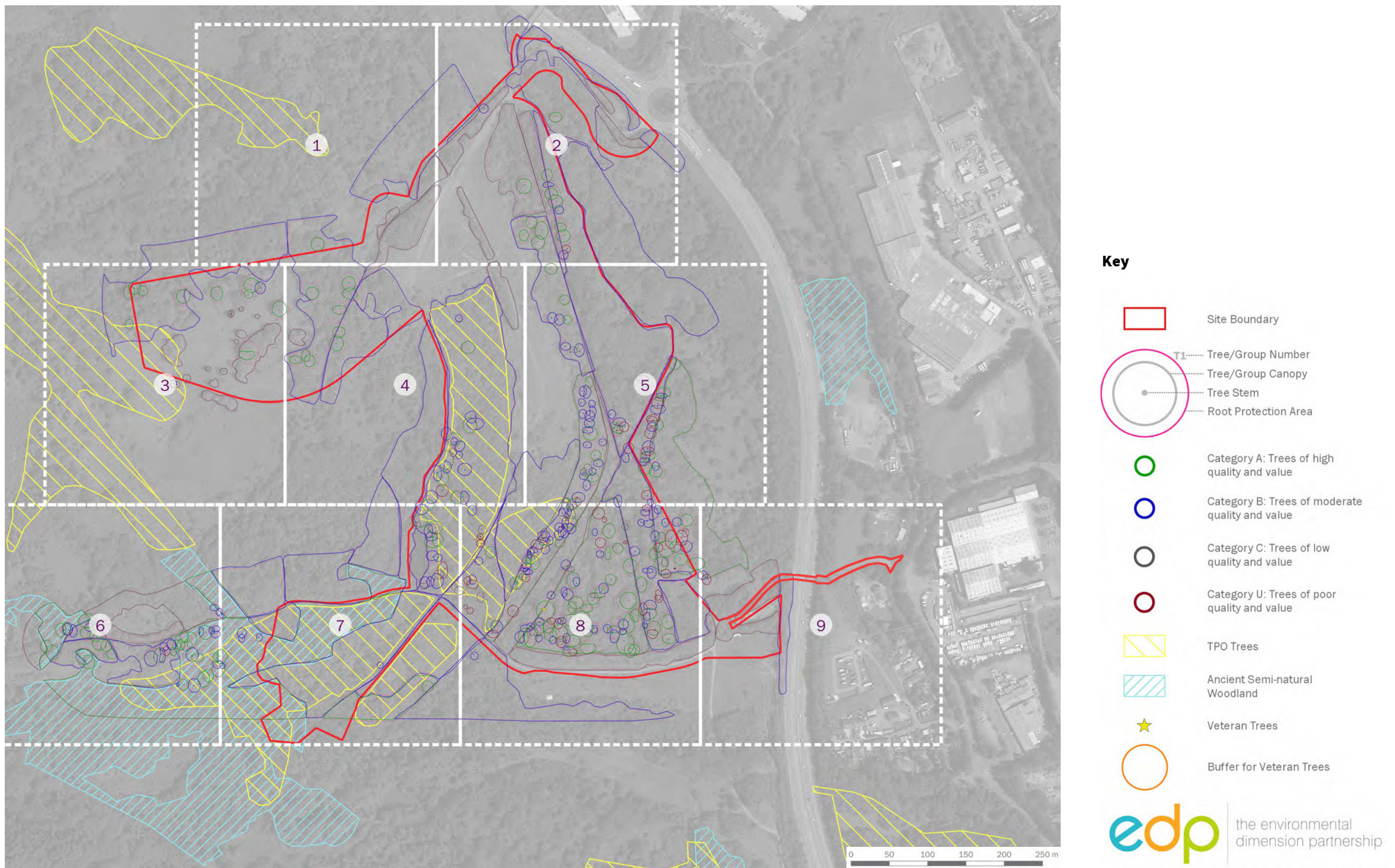


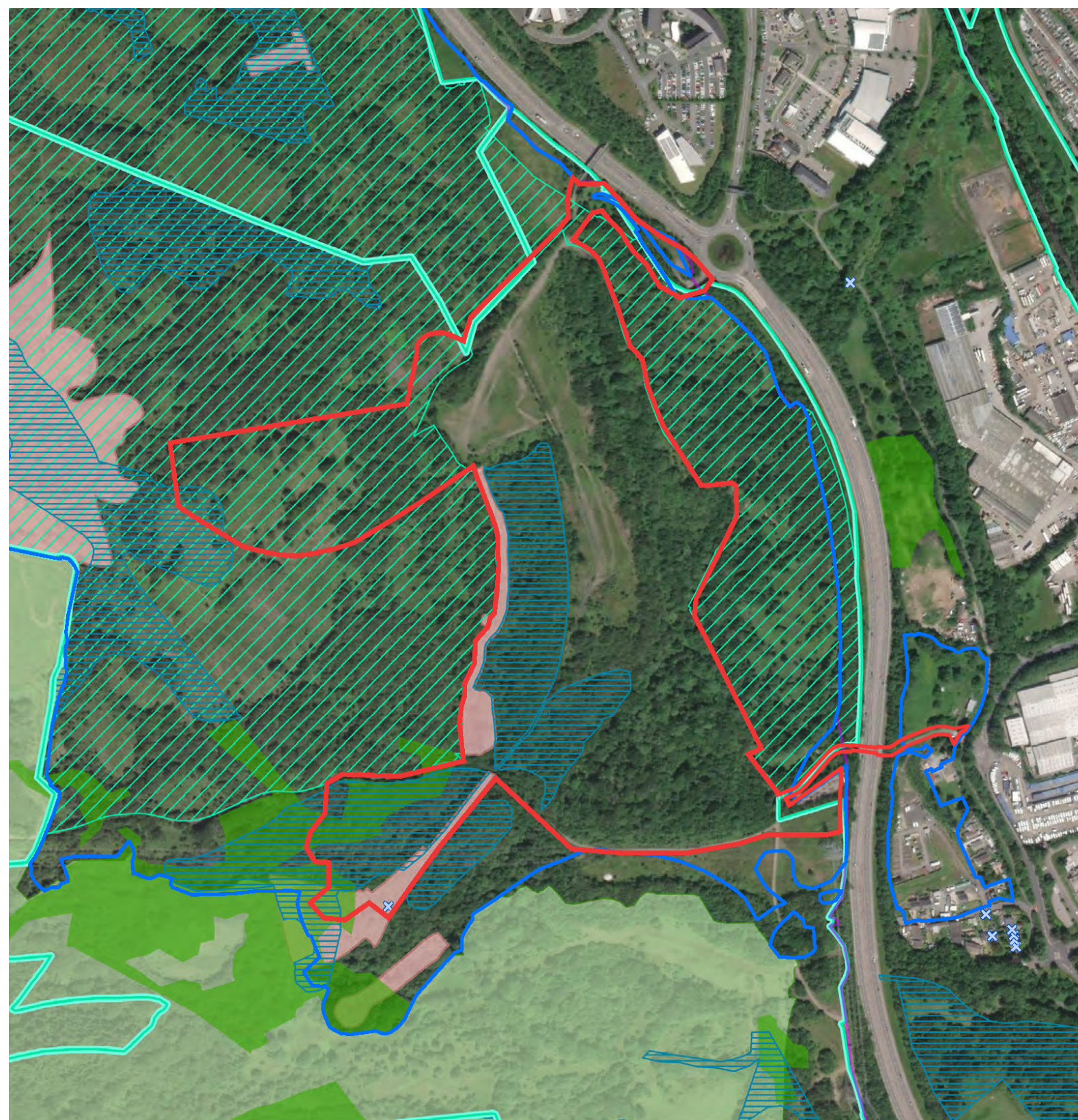
Figure 2: Tree Constraints Plan



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- 2
- 3

1. Central area of the site showing the engineering works carried out by Merthyr Council in 2022
2. View from the top of the A470 Tip in the north of the site
3. Existing structures, tracks and woodland within the site





Key

- Application Site
- Ownership Boundary (approximate)
- EnW5_Special_Landscape_Area
- Ancient and Semi Natural Woodland
- Ancient Woodland Site of Unknown Category
- Plantation on Ancient Woodland Site
- Tree Preservation Orders (TPO)
- Scheduled Monument
- ✕ Grade II
- Landscape of Outstanding Historic Interest
- Site of Special Scientific Interest
- Sites of Importance for Nature Conservation
- CROW Public Forests

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tir collective
LANDSCAPE ARCHITECTS



Figure 3: Site Appraisal

Habitat of ecological value

The ecological resources within and adjoining the Application Site have been documented to an unusually high level of detail in the course of intensive survey campaigns since 2015, undertaken by **Bioscan**. It summarises the surveys carried out to identify and assess the GI elements of importance in advance of the Stepwise approach Step 1 – Avoid and Step 2 Minimise.

The Application Site includes around 6ha of the 181.3ha 181.3ha Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI). This SSSI is designated due to the presence of extensive areas of **unimproved marshy, neutral and acid grassland**, the intimate association of these habitats as a matrix with others (including woodland and heath) and the “outstandingly diverse” assemblage of grassland fungi, for which it is cited as one of the best sites in Britain, and one of the best sites for waxcaps (*Hygrocybe* spp) in western Europe.

The Application Site includes parts of two designated Site of Importance for Nature Conservation (SINC). The larger part of the Application Site overlaps with the Rhydycar West SINC (SINC 36) which is stated to qualify for designation under a range of applicable SINC criteria on the basis of the **mosaic of unimproved and species-rich grassland, heath and other open habitats, extensive wet woodlands, areas of upland oak woodland**, ‘ffridd’ complexes, the presence of great crested newts, badgers and noctule and pipistrelle bats, the ‘possibility’ of water vole and marsh fritillary, a range of nationally scarce invertebrates, UK BAP Priority bird species (equivalent to ‘Welsh Priority’ species as referred to elsewhere in this chapter), the butterflies dark-green fritillary and small pearl-bordered fritillary and a range of uncommon or scarce vascular plants.

There is no ancient woodland mapped as occurring within the main part of the Application Site (i.e. the areas proposed for built development) albeit the south-western spur encompassing the retained heritage features overlaps with some 1.09ha of woodland identified as ancient on both the replacement LDP 2016-2031 Proposals Map and the NRW ancient woodland inventory. There is, however, scant documentary or field evidence to support ancient woodland in this location, and indeed the weight of evidence points to these woodlands not being ancient; refer to paragraph 8.4.11 to 8.4.13 in Volume 1 of the Environmental Statement.

The Application Site is dominated by closed canopy woodland or (locally) more open woodland and scrub interspersed with bracken-dominated vegetation (‘ffridd’). These habitats have little value for grassland fungi and do not contribute to the mycological interest feature of the wider landholding.

The only area of the Application Site supporting grassland fungi interest is on the less recently disturbed area of tips associated with the former Glyndyrys Pit in the central part of the Application Site. A total of 20 waxcap species have been recorded here since 2015,

placing it joint 8th out of 26 sub-sites within the wider landholding that have been noted to support at least one species over the 2015-2021 period.

The ecological surveys by **Bioscan** included European and UK protected Fauna, and Welsh Priority species. The surveys include great crested newt, marsh fritillary and other invertebrates, bats, species of reptiles and birds, badger, polecat and dormice.

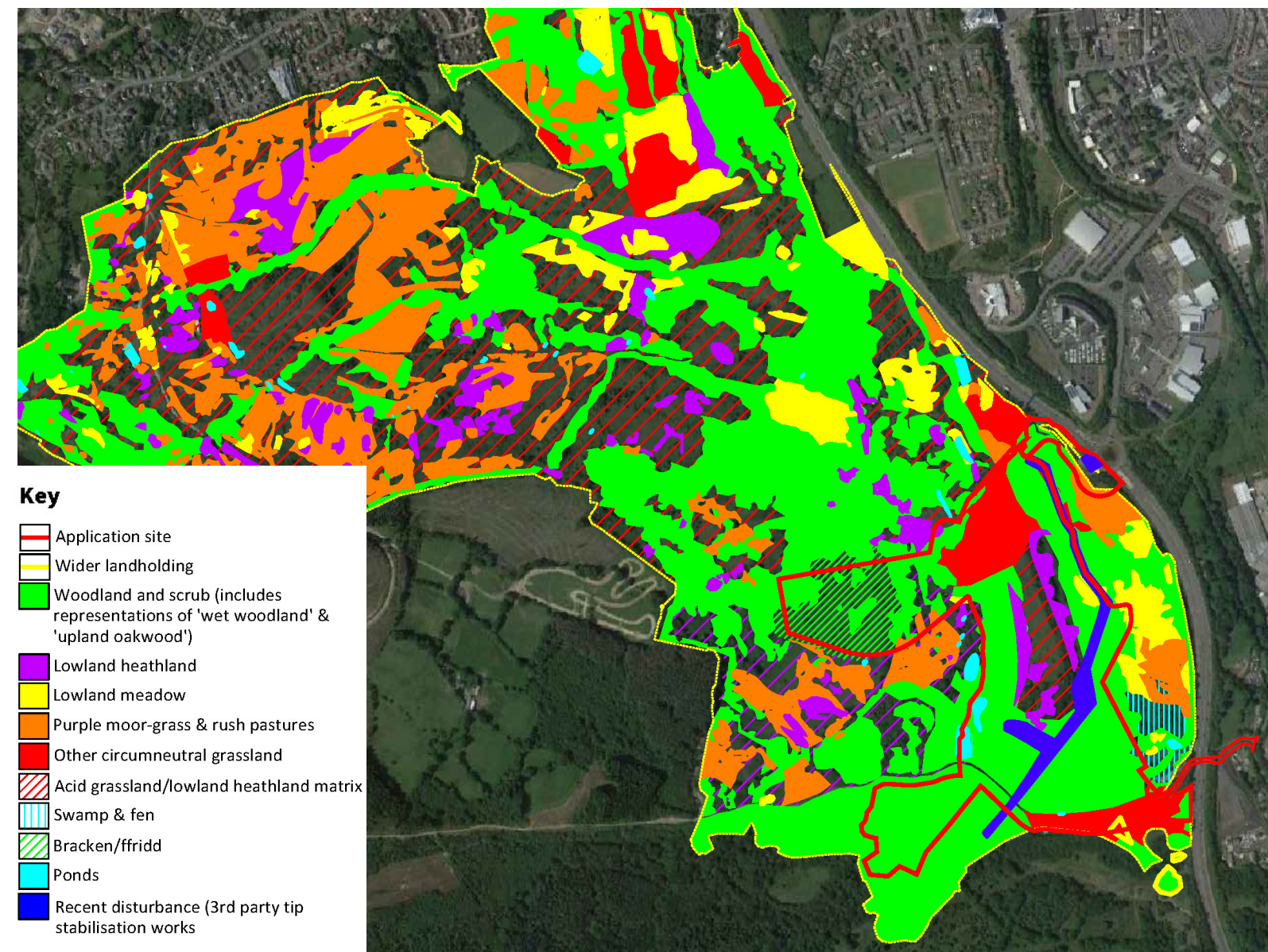


Figure 4: Ecology Survey Plan

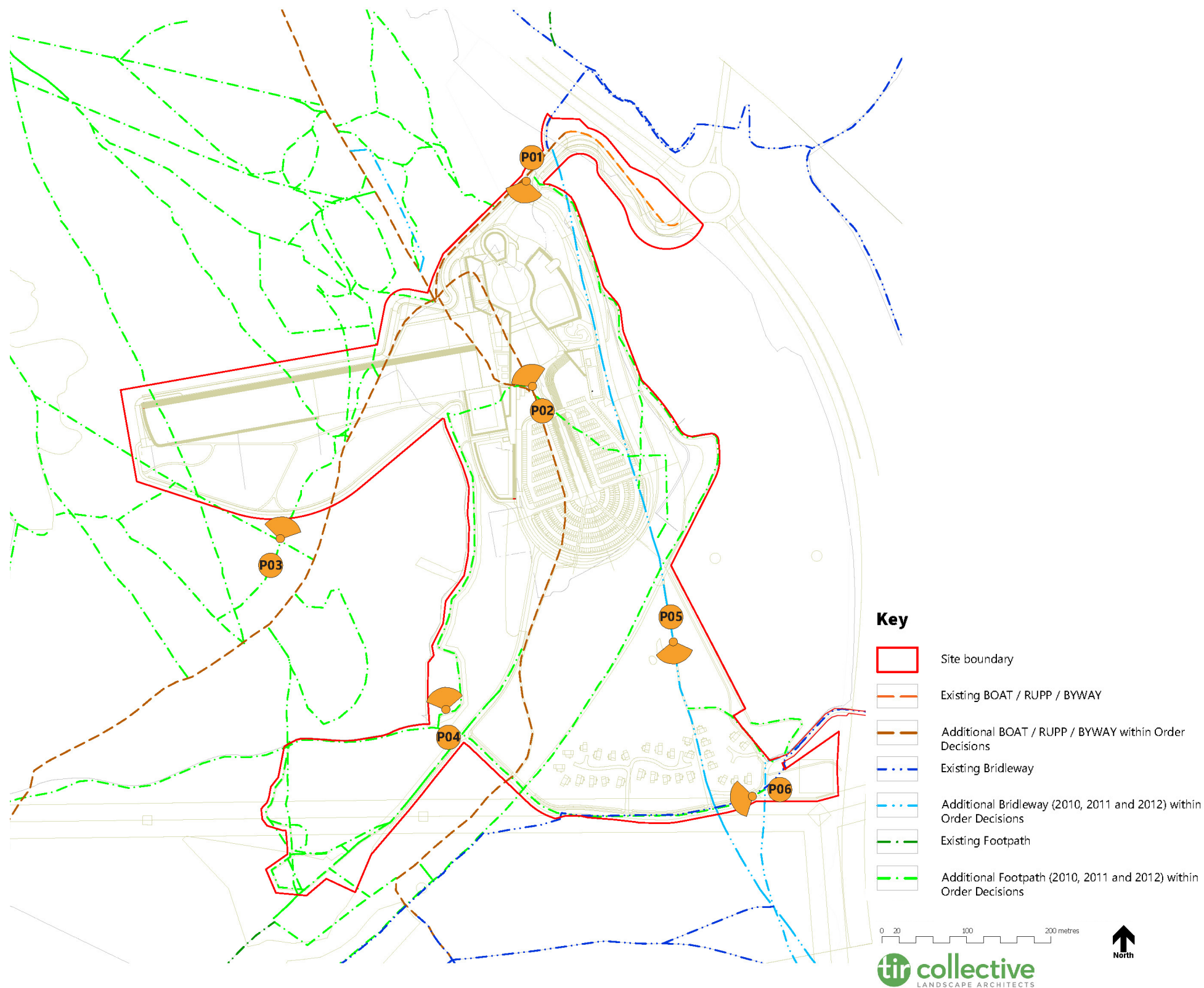


Figure 5: Site Appraisal

Public Rights of Way and open access land

There is a network of public right of way within the site that are used by walkers and mountain bikers (previously as Claimed Rights of Way). The applicant worked closely with Merthyr Council/the Local Authority to enable the creation of a large number of public rights of way across the wider landholding, improving access to green infrastructure for residents and visitors to Merthyr. Providing improved access and contact with nature is a cornerstone of the Building with Nature Standards and formalising public access to the site and its context makes an important contribution to this. On the 24th of January 2023 the Order Decision was issued which confirmed the majority of the Claimed Rights of Way within the site and wider area as Public Rights of Way (PRoW). The decision also included amendments to some of the routes. Figure 4 shows all public access within the site following the Order Decision.

Notable routes includes Parish Road, which runs in a northeast to southwest direction across the north of the site, and Forest Road, which runs west to east across the south of the site and connects the A470 underpass with the entrance to the (disused) Merthyr tunnel. In the west of the site a footpath loops around the south and east of the leat as it heads northwards through the site. Like other routes within the site, the footpath continues beyond the site, and connects to the surrounding PRoW network.

The routes within the site are important from a green infrastructure perspective because they allow the public the ability to access the site to experience and enjoy the variety of green infrastructure. Access to the public right of way network provides an important contribution to the amenity, and health and wellbeing of the local community.

04 Proposals

The Proposed Development

Details of the proposed development are provided on the planning application drawings and the Design and Access Statement accompanying the outline planning application. One of the significant features of the proposed leisure resort development is the construction of an indoor Snow Centre in the northwest of the site. The Snow Centre includes a circa 400m long east facing ski slope that would utilise the natural gradient of the site. Adjacent to the south of the Snow Centre, the existing topography would be re-modelled to create a 1:3 south facing slope that would be planted with a mosaic of grassland and scrub. Maintenance access paths would also be created on the slope with a route located at the base of the slope that connects to the main area of development to the east.

At the base of the Snow Centre ski slope to the east, proposals for the site include a complex of resort buildings that incorporate hotels and leisure activities. To the east of the proposed hotels is a proposed Water Park that integrates indoor and outdoor elements. A proposed Indoor Activity Centre would be located immediately to the south of the base Snow Centre ski slope, east of the planted south facing slope.

Located in the central area of the hotel and leisure complex is a proposed area for a car park, service area and ancillary uses. A Piazza is also proposed that would include hard and soft landscape areas with space for seating and outdoor space related to cafes and restaurants. The Piazza would form the main arrival space for visitors to the development and would connect to the public routes passing through the site which are linked to the public right of way network.

Landscape proposals within the space would include substantial tree planting to provide shelter from the prevailing winds and shade. The main car parking area and drop off area would be located to the south of the Piazza, to the east of the Indoor Activity Centre.

The car parking area would centre around a sloping soft landscape area with SuDS features located around the perimeter.

A proposed Outdoor Activity area is proposed immediately to the south of the Indoor Activity Centre, to the southwest of the proposed main car parking area. The Outdoor Activity area would extend southwards, to the east of the balancing pond and leat, towards the south boundary of the site. Within the north and east of the Outdoor Activity Area, SuDS features are proposed.

In the most southerly extent of the site proposals include the installation of circa 30no. lodges and associated access tracks, which would be set within existing and retained woodland.

Proposals for the site include the diversion of PRoW route which pass through the site and some of the existing routes would need to be formally stopped-up rather than diverted as their alignment conflicts with the proposed development.

Other informal routes are also proposed across the site. A proposed route includes a north to south direction route that connects to the main access road in the north of the site and heads southwards, east of the main hotel and leisure complex, to connect to several routes that transect the southern area of the site, which includes a route that follows the disused railway line. The proposed routes would also seek to connect with the PRoW within the site and the surrounding PRoW network beyond the site boundary, which provide connections to Merthyr Tydfil town centre and Pentrebach.

Landscape Approach

There are five identifiable key spaces that form the heart and immediate landscape context of the built development, as identified on **Figure 6**:

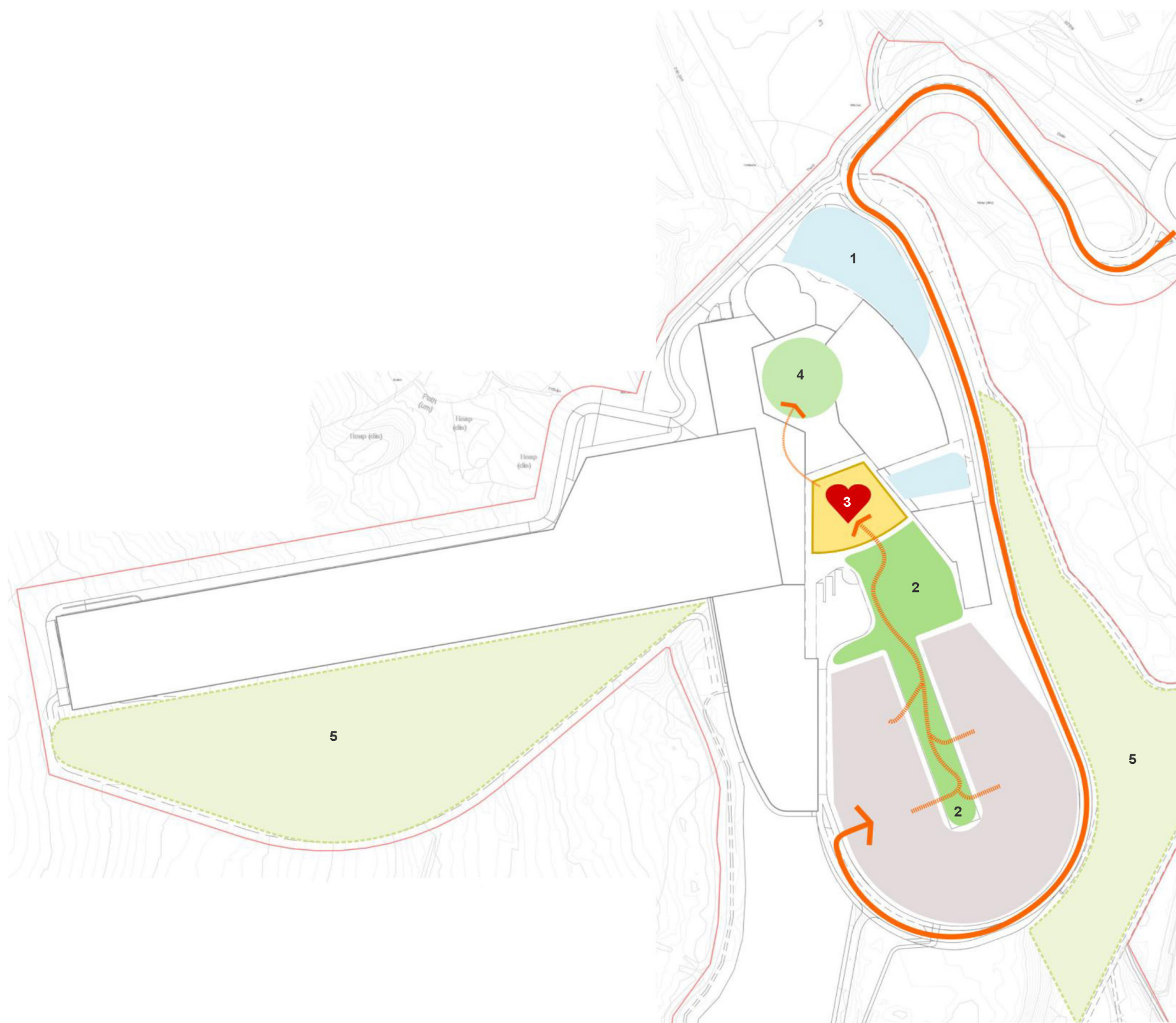
1. The Lake: This is an arrival space on the main access to the site where there will be views across a small lake. The lake has a dual purpose, on the one hand, it acts as part of the new resort's sustainable drainage system, and on the other hand, it helps to create an arrival space for visitors.

2. The Boulevard: The Boulevard is proposed as a meandering pedestrian route through a linear park. It is intended to provide guests and visitors with a sense of anticipation before their arrival into the Piazza. At the same time, it is intended to provide a vertical transition between the (main) car park level and the level of the Piazza that will appear recessed into the landscape. The level change along with the proposed planting strategy, will provide shelter from the prevailing wind.

3. The Piazza: The Piazza will be the focal point for outdoor activities, accessible by visitors, the general public and local community. The space would host special events and festivals relating to culture and sport, while also being an arrival, congregating and orientating space. The landscape proposals include specimen tree planting and SuDS features to bring green infrastructure into the space and provide amenity value.

4. The Garden Courtyard: In contrast to the Piazza, the Garden Courtyard is a more private space for visitors to the new resort. The space will comprise areas of naturalistic planting with small pockets of hard landscaped to create a space for special events in a more private setting. It will accommodate the new resort's front-of-house functions, such as guest lounge terraces.

5. Areas of landscape mitigation: Areas affected by the master plan works will, over time, be managed to enable re-wilding of the surrounding landscape, and the creation of transitional buffer zones. The southern flank of the Snow Centre will be managed as a mosaic of scrub and grassland. The eastern part of the site will be managed as woodland to reinforce visual screening and an ecotone on the area of earthworks.



This Green Infrastructure (GI) Strategy for the project is consistent with planning policy at a national and a local level which emphasise the importance of the retention of existing trees. [Future Wales Policy 14](#) emphasises the importance of retaining and enhancing woodland cover to build resilience of ecosystems and achieve Welsh Government targets of increasing woodland cover by at least 2,000 ha per annum from 2020. It recognises the wide range of benefits for society provided by trees and woodland, and that they are therefore an essential part of the Green Infrastructure Network and delivering placemaking objectives.

The GI Strategy aims to create interconnected green infrastructure associated with the retained woodland and habitat mosaic adjacent to the site. It aims to integrate the development into its landscape context and minimise potential adverse effects on landscape character. The strategy reflects the rural character of the site context to the west and the interface with the existing urban edge of Merthyr Tydfil to the east.

The GI Strategy retains existing vegetation patterns which contribute to landscape character. Woodland and scrub within the site and along the boundary of the site is retained to add maturity to the landscape setting of the proposed development. Proposed planting will complement the retained vegetation and reinforce habitat connectivity.

Figure 6: Concept Plan

Theme

Multi-functionality

The Landscape Strategy for the proposed development is guided by the following **five concept themes** which are illustrated at **Figure 7**. These are:

- Connected Landscape
- Biodiverse Landscape
- Sustainable Landscape
- Hands on Landscape
- Active Landscape

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

- Respond to the character of the site;
- Create an attractive place with a focus on planting with bold and dramatic effects to create beautiful spaces with year round interest;
- Encourage interaction with the landscape and contact with nature and the unique heritage of the site.
- Create a distinctive place through naturalistic planting to create multifunctional green infrastructure.



- Connect networks of green and blue infrastructure, including woodland to provide a better setting for walking routes (**Active Landscape**), SuDS (**Sustainable Landscape**), and improve biodiversity (**Biodiverse Landscape**)
- Improved connectivity offers opportunities for social interaction (**Hands on Landscape**)



- 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 visitors to the site and nature (**Active Landscape**), (**Hands on Landscape**)



- 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**)



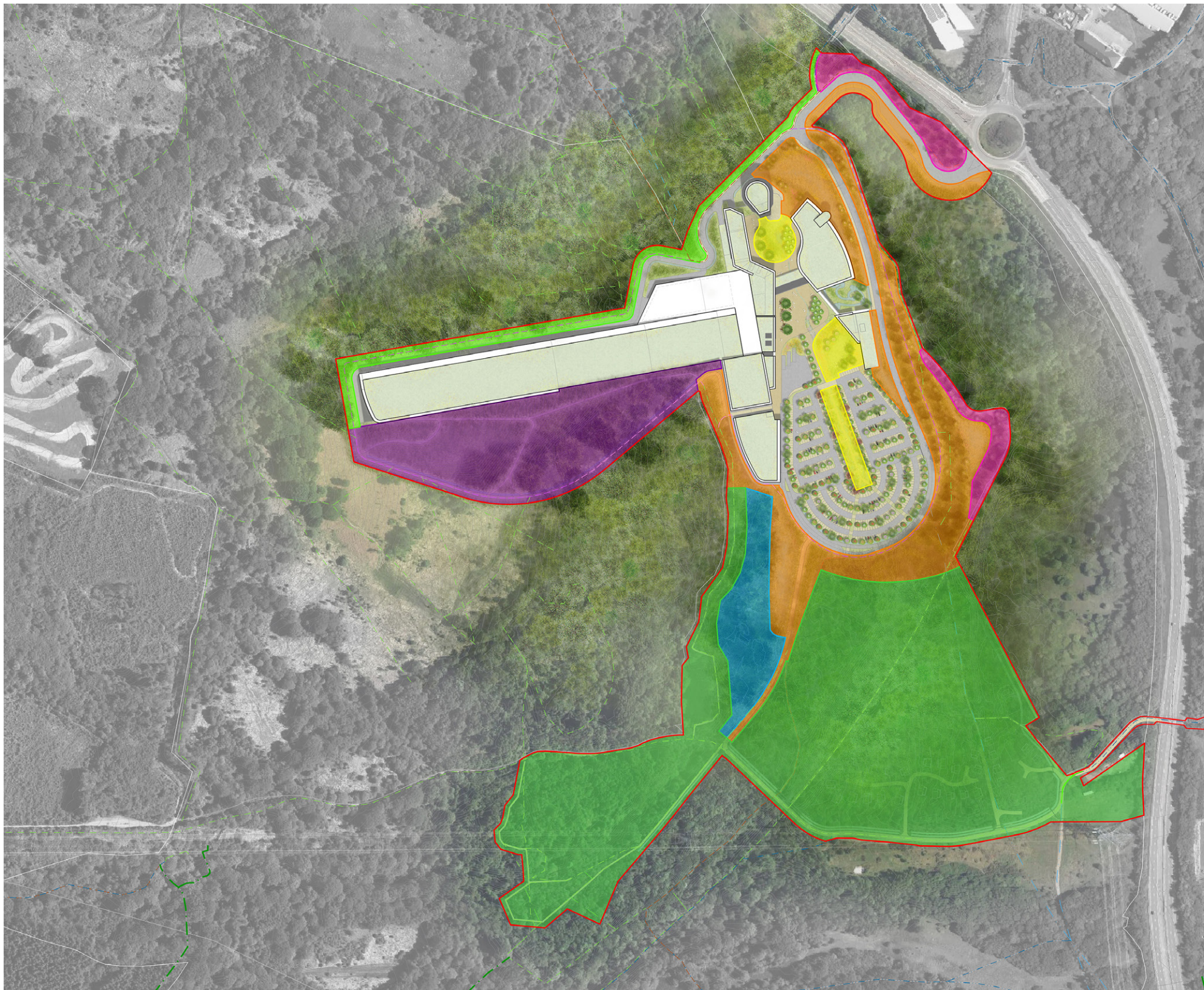
- Opportunities for foraging, movement and exercise (**Active Landscape**) (**Sustainable Landscape**).
- Local involvement in conservation and landscape maintenance can provide a local focus on biodiversity (**Biodiverse Landscape**)



- Connect networks of green and blue infrastructure to provide a better setting for walking routes (**Active Landscape**), SuDS (**Sustainable Landscape**), and improve biodiversity (**Biodiverse Landscape**)
- Increasing interaction with the landscape through exercise / outdoor activity / relaxation will encourage contact with nature (**Hands on Landscape**)



Figure 7: Green Infrastructure Concept

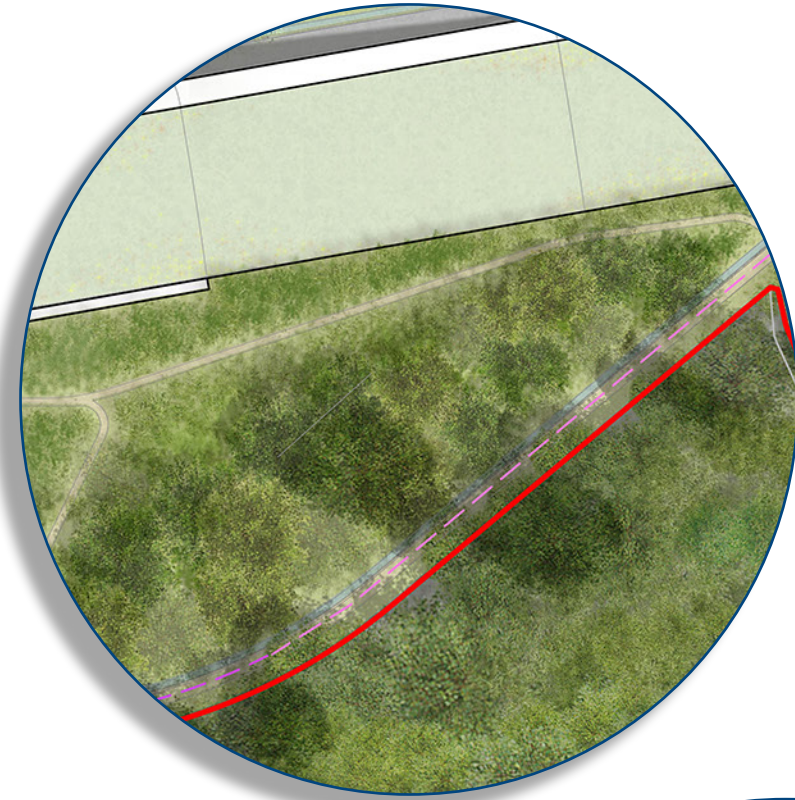


Key

- Site boundary
- Existing woodland mosaic to be retained and managed to increase species diversity (11.5 ha)
- Existing woodland retained within Outdoor Activity Centre (0.96ha)
- Proposed ecotone transition habitat between the development and retained woodland (3.87 ha)
- Proposed boundary tree and scrub planting for visual mitigation (0.81 ha)
- Proposed habitat mosaic of scrub and grassland (2.96 ha)
- Proposed woodland buffer ecotone management (0.77 ha)
- Proposed amenity green space (0.59 ha)

Figure 8: Green Infrastructure Parameter Plan

Habitat Creation



The open spaces within the development would each have a different approach to green infrastructure to realise the amenity and biodiversity potential. Integrated Sustainable Drainage features would improve the diversity of the green infrastructure with multiple benefits - biodiversity, amenity, a setting for walking routes and outdoor adventure space.

The planting palette consists of a mix of native, ornamental flowering and low maintenance species, structured around native species of trees and shrubs, herbaceous flowering plants and grasses to provide variety through the seasons and reinforce legibility of routes.

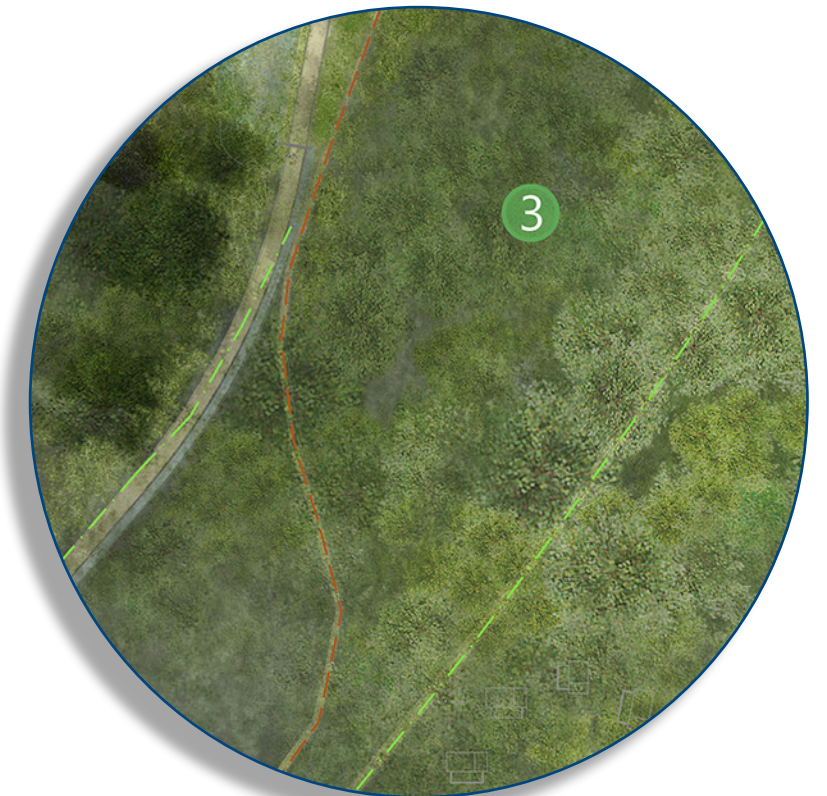
The Piazza



The Boulevard and car park



Woodland



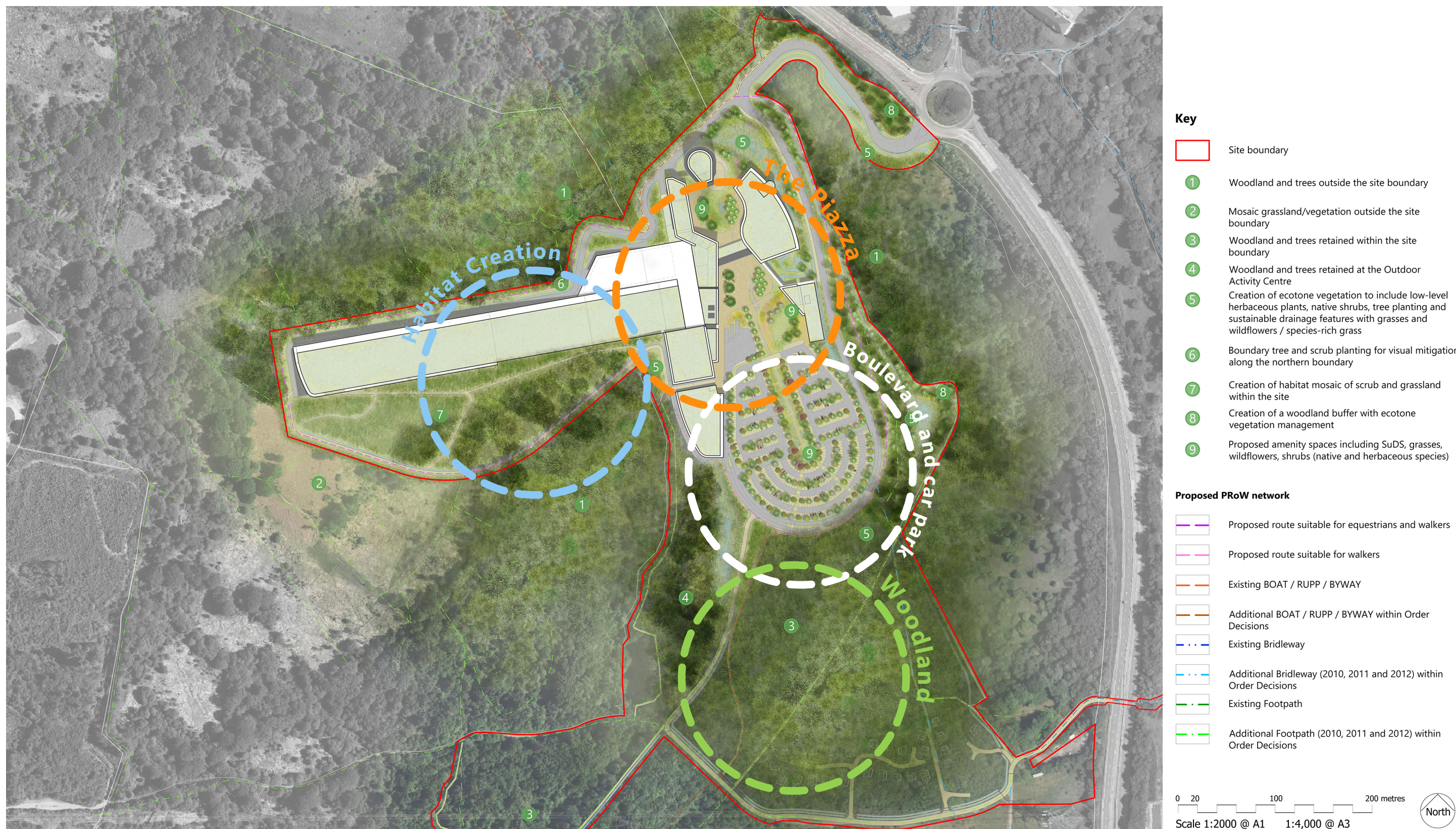


Figure 9: Green Infrastructure Strategy

The planting strategy includes native and ornamental species throughout. Specifically native mixes are proposed for scrub reestablishment. Native species are chosen to provide fruiting and flowering and also offer interest due to foliage colour.

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 in Forest Practice Note No. 8, titled Using Local Seed Sources for Planting Native Trees and Shrubs, Forestry Commission (1999).

Native Scrub Mix



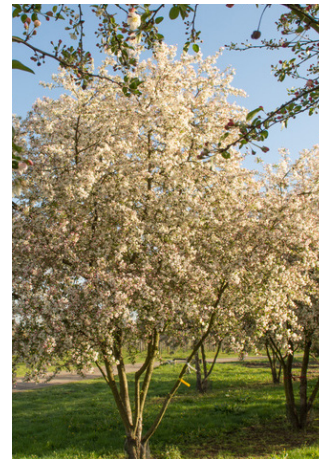
Shrub/Perennial SuDS Mix



Shrub/Perennial Piazza Mix



Tree Planting Species



Medium/Large street trees will be established with a linear shared root zone of 20 m³ per tree within soft landscape areas. Native tree species are proposed wherever possible. Where the use of non-native species is justified then suitable species are:

- Liquidambar styraciflua
- Betula pendula
- Pyrus calleryana 'Chanticleer'
- Alnus spaethii
- Quercus robur
- Fagus sylvatica
- Alnus spaethii
- Tilia tomentosa 'Brabant'

Smaller trees will be established within green spaces with a root zone of 10-15m³ per tree within soft landscape areas. Native tree species are proposed wherever possible. Where the use of non-native species is justified then suitable species are:

- Acer campestre
- Amelanchier grandiflora 'Robin Hill'
- Crataegus monogyna
- Sorbus aucuparia
- Ilex aquifolium 'J.C. Van Tol'
- Malus 'Evereste'
- Malus hupehensis'
- Prunus sargentii 'Rancho'



05 Green Infrastructure Statement

This statement provides a description of the effects of mitigation of the individual green infrastructure components, which forms the Stepwise **Step 3: Mitigate/Restore**, with a view to minimising any negative impacts on biodiversity as far as possible.

Trees, woodland and scrub mosaic

Existing trees and scrub mosaic at the site make an important contribution to the distinct landscape character of the site and its context. They are also important GI elements for their biodiversity and habitat value, contributing to the ecology designations at the site. The approach to the design of the proposed development identified this importance of green infrastructure elements through comprehensive surveys. The retention of GI was a priority wherever possible, in accordance with **Step 1: Avoid** and **Step 2: Minimise**.

During the design development of the project consideration was given to retaining all trees where possible. However, ultimately the removal of any tree is dependent on its proximity to the footprint of any proposal and associated earthworks. The BS 5837:2012 compliant survey identified **45 category U items**, the condition of which are considered to be impaired to such an extent that they should be removed irrespective of any development proposals.

Assessment of the proposed site layout determines that a further 93 items are impacted by the development proposals; these are detailed within the Arboricultural Impact Assessment prepared

by **The Environmental Dimension Partnership Ltd, November 2022**. Of the total, 35 of the items are category A, of high quality; 31 of the items are category B, of moderate quality; and 27 of the items are category C, of low quality.

Table EDP 4.1: Summary of Tree Loss and Retention

	Existing	Trees, Groups and Hedgerows Lost Due to Proposals	Trees, Groups and Hedgerows Affected by Proposals	Trees, Groups and Hedgerows Unaffected by Proposals
Category A	153	35	0	118
Category B	175	24	7	144
Category C	62	26	1	35
Totals	390	85	8	297

The 93 items impacted by the development proposals are listed in **Table EDP 4.1**, including 85 Trees, Groups and Hedgerows Lost, and 8 affected by the proposals. In this context, the term 'affected' means a retained tree, group or hedgerow where mitigation is proposed to ensure its viable retention, for example, where excavation or encroachment is proposed within a tree's RPA, or where a crown lift/reduction or partial removal is required.

The Woodland Lodges will be positioned to reduce impacts and retain trees where possible. Construction methodology for the woodland lodges is provided in **Appendix EDP 7** of the Arboricultural Impact Assessment.

Existing trees identified for retention on the Tree Retention and Removal Plan will continue to be managed in accordance with BS 5837:2012. Critically, this requires implementation of physical protection measures to safeguard the retained trees, including robust protection in the form of a barrier to BS 5837:2012 standard and ground protection (where required) also to BS 5837:2012 standard, during the demolition and construction phases.

To address the loss of trees and scrub, the green infrastructure proposals include **Stepwise Step 3: Mitigate / Restore, Step 4 : Compensate** and by considering **Enhancement at each stage in accordance with the DECCA Framework**. Sufficient space is set aside for green infrastructure, as shown on **Figure 8:**

Green Infrastructure Parameter Plan. The plan shows a total of 12.46 hectares of woodland in the southern part of the site which is retained with targeted and improved management. In the northwestern part of the site there is 3.77 hectares of habitat creation where woodland and scrub planting would occur.

An ecotone of 3.87 hectares is proposed adjacent to the south and east edge of built development. This would include some retention of existing woodland and also woodland and scrub planting.

The public and visitor spaces within the development, and the car parking, would accommodate significant tree planting as shown on Figure 8.

At the outline planning application stage it is not possible to confirm the exact number of trees proposed as part of the proposed development. This level of detail will be established during subsequent reserved matters applications and detailed planting plans to discharge planning conditions. However, the Green Infrastructure Parameter Plan at **Figure 8** does establish the space available within the Application Site for mitigating the loss of green infrastructure.

While a portion of the 20.87 hectares set aside and sustainable drainage features, a significant proportion of this total would be retained woodland or established woodland and scrub. Through the management of existing woodland and the establishment of new woodland it would be possible to achieve an increase species diversity compared to the existing woodland. A more diverse mix of tree species at the site would increase the climate and disease resilience of the trees on site. Greater species diversity would also add to the seasonal and biodiversity interest.

Arboricultural Impact Assessment (**The Environmental Dimension Partnership Ltd**, November 2022) concludes that:

"The sensitive integration of development at the site represents a significant challenge due to the combination of former mining features, disused railway infrastructure, tips and the distinctive

character of the site and its context. The vision of the proposed development is centred around what will be the longest indoor snow centre in the UK (incorporating the national training headquarters and facility for Snowsports Cymru Wales and GB Snowsport). The master plan is for a new destination sports, leisure and tourism resort. Central to this is the creation of a high-quality holiday resort destination that focuses on indoor and outdoor activities, wildlife and reinforces the special character of the local environment.

The proposals for the site have been formulated through an iterative process with the design evolution responding to the findings of baseline surveys to avoid or moderate adverse effects. The proposals have been informed by comprehensive survey and assessment work. As a result, the arboricultural impacts have been moderated. The proposals therefore satisfy policy requirements relating to the site. Adverse arboricultural effects reflect the scale of the built form and earthworks proposed.

The AIA has identified that the site could accommodate the proposed development without resulting in an unacceptable adverse impact on the tree stock”.

Tree planting proposed is appropriate to mitigate the level of tree loss. Paragraph 6.4.25 of the Annex¹ to Heads of Planning Letter Dated 11 October 2023, states that 'Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost'.

The land set aside for green infrastructure on **Figure 8: Green Infrastructure Parameter Plan** would provide space for tree replacement in excess of the level defined above.

¹ Annex to Heads of Planning Letter Dated 11 October 2023: Addressing the Nature Emergency through the Planning System: Updated National Planning Policy for Chapter 6 of Planning Policy Wales

Habitat of ecological value

The location of the development and the extent of the Application Site have been configured through numerous design iterations in order that overlap with the designated Cwm Glo a Glyndyrys SSSI is restricted to the absolute minimum necessary. This has seen the quantum of SSSI land affected by the proposed development incrementally reduced over time in order to reduce impacts on the statutory site.

Both the location of the development within the wider landholding and the detailed positioning and extent of the Application Site have been configured through numerous design iterations in order to firstly avoid impact on the SSSI (**Step 1** of the Stepwise approach) and then to ensure that overlap with the designated Cwm Glo a Glyndyrys SSSI is restricted to the absolute minimum necessary (**Step 2** of the Stepwise approach). This has seen the quantum of SSSI land affected by the proposed development incrementally reduced over time in order to reduce impacts on the statutory site. Some SSSI landtake remains unavoidable, however, in order to deliver the indoor snow centre, which is the 'wholly exceptional' central focus of the scheme. In total, a direct landtake of 6ha of the SSSI is anticipated, which represents a little over 3% of the total land area of Cwm Glo a Glyndyrys SSSI.

The features of the SSSI that will be directly affected are woodland, scrub and 'ffridd' habitats of a type falling outside the scope of the primary interest features of the SSSI. The focus of mitigation and compensation will be for effects on the SSSI are outside the Application Site.

In the first instance, this will be in the wider landholding where the opportunity for optimised management of both SSSI and non-SSSI resources. In addition, there will be enhancement of habitats complementary to the SSSI interest features (in particular lowland meadow and marshy grassland) on additional land the applicant has agreed an option to purchase at Blaencanaid Farm.

Additional offsite measures, are also being prepared, either enhancing additional land and related habitats off-site or via financial contributions to established or new conservation projects ecologically and geographically relevant to the South Wales region.

Within the site there are 20.87 hectares set aside for green infrastructure, as defined on **Figure 8: Green Infrastructure Parameter Plan**. This total includes retained woodland where

improved management would increase the species diversity and climate resilience of the woodland. It also includes established woodland and scrub, introducing more diversity to the vegetation on site. A habitat mosaic would be created with grassland area and transition habitats at the edges of the site. The planting proposals will help integrate and visually soften the proposed development into the landscape while also maintaining habitat connectivity.

The recommendations contained within the ecological mitigation strategy for the site have been incorporated into the development proposals as far as is possible at the outline planning application stage. Detailed proposals will be included at the Reserved Matters Application stage, when detailed planting and management proposals will be provided within the 20.87 hectares set aside for green infrastructure. The proposals reflect the **Stepwise Step 3: Mitigate / Restore, Step 4 : Compensate** and have considered the potential for **Enhancement at each stage in accordance with the DECCA Framework**.

Public Rights of Way and open access land

The proposed development incorporates suggested alternative routes for the majority of the public rights of way confirmed within the Order Decision on the 24th of January 2023. Routes would be diverted around the perimeter of the site to maintain access and to ensure the site is connected to surrounding routes. The applicant worked closely with Merthyr Council/the Local Authority to enable the creation of a large number of public rights of way across the wider landholding, improving access to green infrastructure for residents and visitors to Merthyr. Providing improved access and contact with nature is a cornerstone of the Building with Nature Standards and formalising public access to the site and its context makes an important contribution to this.

While some of the existing public footpaths would be removed as a result of the proposed development, a proposed alternative network of public access will be created; refer to **Figure 10: Proposed public routes**. Proposed routes would be safe, fit for purpose and would include information boards to explain the heritage and biodiversity of the site.

The proposed heritage routes are shown on **Figure 11: Proposed Heritage Trails** - these have been created in consultation with and following advice from Cadw. A number of the routes would have appropriate width, gradient and surfacing to enable access by disabled people and young families.

Within the site a network of walking, cycling and running routes are proposed within green infrastructure areas for visitors and guests. Cyclists and pedestrian connections across site would be designed to ensure the 'landscape journey' is interesting, presents different and changing experiences and is also safe.

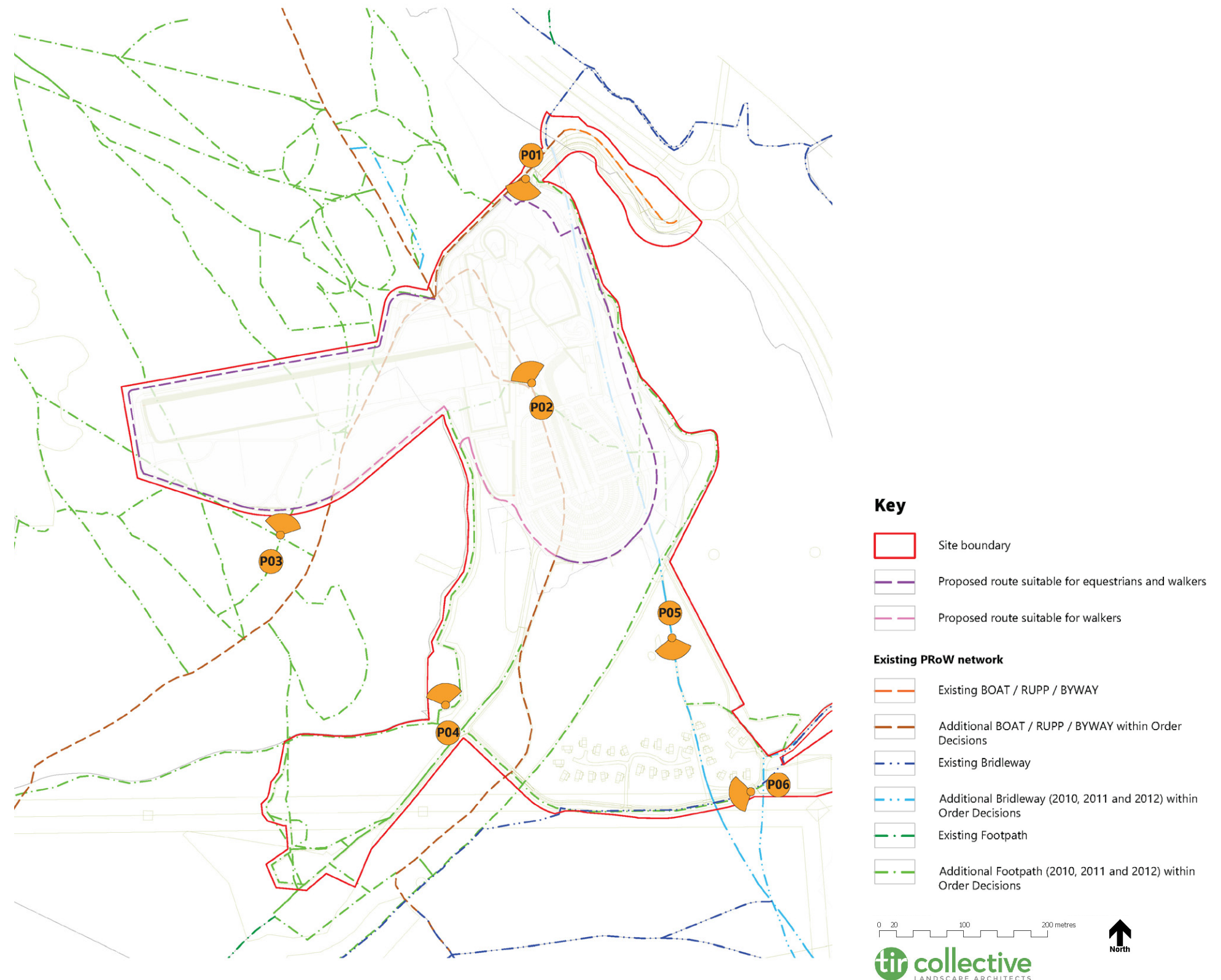


Figure 10: Proposed public routes

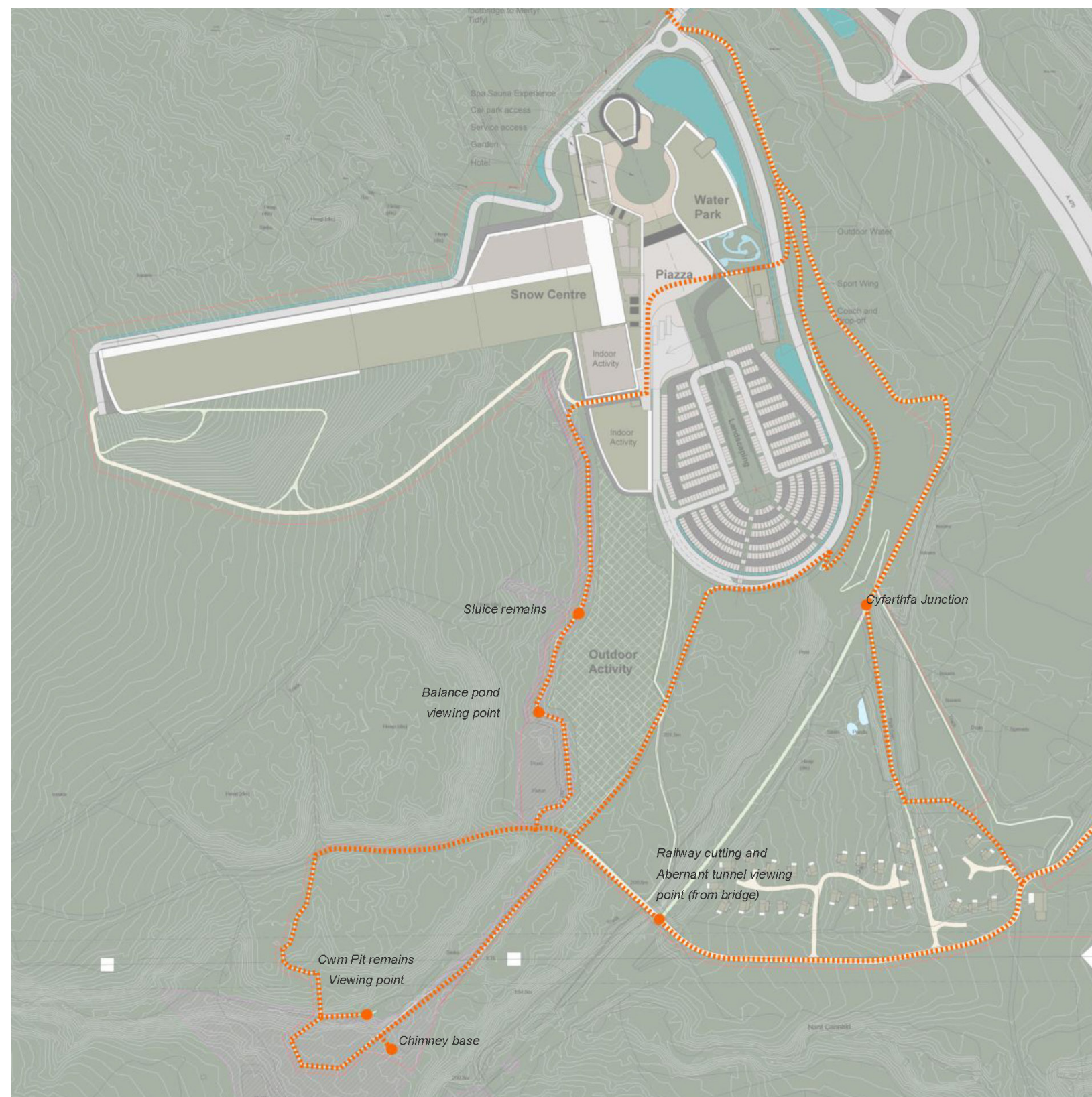
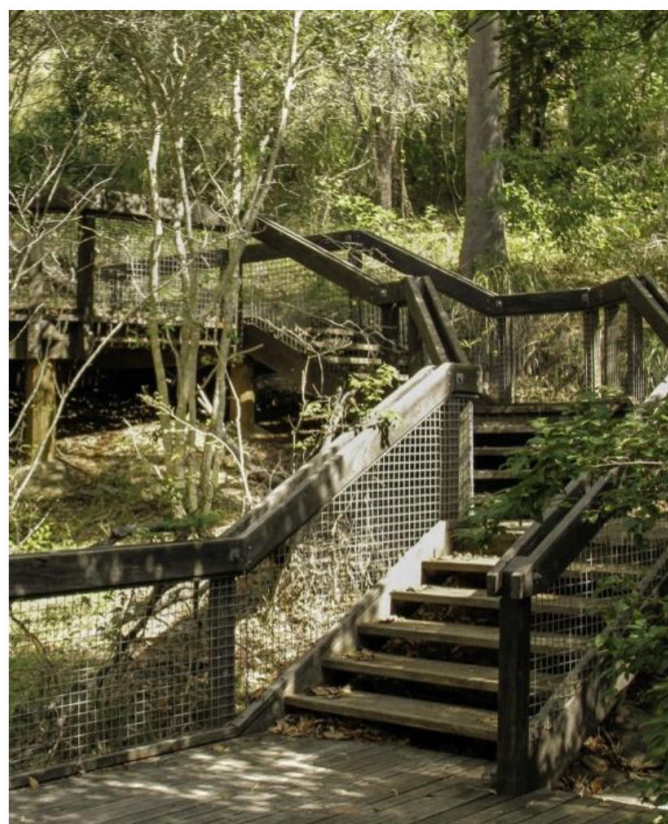
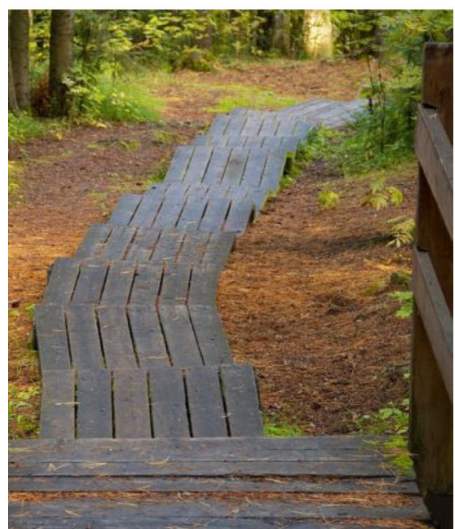


Figure 11: Proposed Heritage Trails

Multi-functionality of Green Infrastructure

This section identifies the multi-functionality of each green infrastructure element: Trees, woodland and scrub mosaic, habitat of ecological value, public rights of way and public access. These elements reflect the over arching principle of **Stepwise Step F: Enhance**, applying the principles of good placemaking and green infrastructure.

The multi-functionality of green infrastructure is described as "GI functions are the roles that assets can play if planned, designed and managed in a way that is sensitive to, and includes provision for, natural features and ecosystem services. They may have obvious primary functions, but each asset can perform different functions simultaneously". Figure 5 establishes the Strategy aims and the GBI functions and benefits of the proposals are listed in Figure 12, against the list below:

- Contribution to Placemaking
- Flood Mitigation
- Cooling and Shade
- Food
- Exercise
- Health and Wellbeing
- Calming and Inspiring
- Nutrient Cycling
- Wildlife Habitat
- Wind break
- Cleaning Water and Air

Figure 12 lists the key retained and proposed landscape assets, its green infrastructure element, and the functions of each landscape asset while signposting against the Building with Nature Standards.

Landscape asset	Green infrastructure element	Functions	Building with Nature Standards
Trees and woodland and scrub mosaic	Trees / vegetation	• Wildlife Habitat • 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 • 7 - Brings Nature Closer to People
Scrub mosaic	Scrub	• Wildlife Habitat • Contribution to Placemaking • Cooling and Shade • Food • Calming and Inspiring • Health and Wellbeing • Nutrient Cycling • Wind break • 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
Shrub planting within development	Trees / vegetation	• Contribution to Placemaking • Food • 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	• 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 species rich grasslands	Grassland	• Wildlife Habitat • Calming and Inspiring • Exercise • Health and Wellbeing • Nutrient Cycling • Wildlife Habitat • Contribution to Placemaking	• 1 - Optimises Multi functionality and Connectivity • 2 - Positively Responds to the Climate Emergency • 3 - Maximises Environmental Net Gains • 5 - Creates Distinctive Places • 6 - Secures Effective Place-keeping • 7 - Brings Nature Closer to People • 11 - Delivers Wildlife Enhancement • 12 - Underpins Nature's Recovery
Proposed habitat creation areas	Ecology	• Wildlife Habitat • Calming and Inspiring	• 3 - Maximises Environmental Net Gains • 11 - Delivers Wildlife Enhancement • 12 - Underpins Nature's Recovery

Figure 12: GI Functions / Benefits and Building with Nature (BwN)

Resilience of Ecosystems

The Environment (Wales) Act 2016 provides a duty upon public bodies such as Merthyr Tydfil County Borough Council to promote the resilience of ecosystems, which is reflected in planning policy.

The proposed green infrastructure strategy would comprise extensive areas of habitat retention and areas of habitat creation. Within the development there would be significant planting areas with a range of species, both native and non-native species, to enhance biodiversity and botanical diversity. The species selected would be 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 the resilience of habitats to climate change.

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

06 Conclusion

The landscape and public open space proposals at Rhydycar West are based on a Stepwise Approach, and given the importance of existing green infrastructure at the site, the strategy aimed to avoid and retain green infrastructure wherever possible. Where green infrastructure features have been lost, the proposals provide space for this loss to be mitigated and/or compensated for the loss and would enhanced the green infrastructure overall.

The proposals aim to create a hierarchy of spaces within the development which would each have a different approach to green infrastructure to realise the amenity and biodiversity potential. Integrated Sustainable Drainage features would improve the diversity of the green infrastructure with multiple benefits - biodiversity, amenity, a setting for walking routes and outdoor adventure space.

The planting palette consists of a mix of native, ornamental flowering and low maintenance species, structured around native species of trees and shrubs, herbaceous flowering plants and grasses to provide variety through the seasons and reinforce legibility of routes.

SuDS features are integrated into the landscape strategy, introducing flowering pollinator species to provide a source of nectar for bees and other insects.

The landscape proposals make a good contribution towards the strategy aims defined against the landscape concept themes for the project defined on **Figure 7: Green Infrastructure Concept**. The strategy aims are:

- Retain existing trees wherever possible, especially higher quality (A and B Category trees) and supplement with new native planting of Welsh provenance..
- Create green corridors along retained vegetation with transition habitats.
- Establish strong connectivity across the site for people and nature.
- Focus on habitat enhancements which improve species and age diversity to improve longevity and resilience to climate change.
- Planting and grasslands to be designed to work with nature, based on lower future maintenance requirements.
- Prioritise tree planting within soft landscape to avoid the need for underground root crates to achieve sufficient rooting volume.
- Integrate SuDS features as part of landscape proposals to improve amenity value.
- Promote convenient, direct, attractive and safe routes through green infrastructure.
- Establish a setting for the resort based on the distinct character of the site which is attractive and provides interaction with nature.
- Create a landscape that changes with the seasons to increase amenity and reinforce a connection with nature.

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

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

Overall, it is considered that the proposed development would be in accordance with the Local Development Plan policies relating to Green Infrastructure.



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