



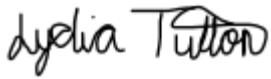
**68 High Street,
Merthyr Tydfil**

Green Infrastructure Statement

October 2025

Acer Ecology

DOCUMENT CONTROL

68 High Street, Merthyr Tydfil Green Infrastructure Statement				
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2.0	02 October 2025	Lydia Tutton Assistant Ecologist 	Paul Hudson MCIEEM Principal Ecologist 	Paul Hudson MCIEEM Principal Ecologist 

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1. Introduction

1.1. Background to Green Infrastructure

Planning Policy Wales defines green infrastructure as:

"The network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Component elements of green infrastructure can function at different scales. At the landscape scale green infrastructure can comprise entire ecosystems such as wetlands, waterways and mountain ranges. At a local scale, it might comprise parks, fields, public rights of way, allotments, cemeteries, and gardens. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks¹."

There has recently been an update regarding the National Planning Policy for Chapter 6 of Planning Policy Wales². In addition, Planning Policy Wales version 12 was published in February 2024. A green infrastructure statement must now be submitted with all planning applications, that describe how green infrastructure has been incorporated into the development proposals.

1.2. Green Infrastructure Assessment

The aim of a Green Infrastructure Assessment (GIA) is to ensure that all elements of GI are coordinated from the outset, so that biodiversity, trees, soils, landscaping, SuDS, amenity, access, recreation and climate change mitigation and adaptation are integrated into a scheme which delivers multiple benefits. Ideally, a GIA should be a strategy which informs the design and layout of a scheme, rather than retrospectively explaining how it might work.

1.3. Background to Proposed Development

The original development plans involved the conversion of the former offices into 12 flats and the demolition of a storage building to the rear to facilitate the creation of additional parking spaces.

Updated development plans now involve the internal alterations only of floors 1 and 2 of B1. No works are now proposed, either internal or external, to B2. The most recent use is thought to have been used for office accommodation however the unit(s) have been vacant for a considerable period.

A planning application has been submitted under reference P/24/0158². While the planning application states "and associated external alterations", the client has stated that no external alterations of either B1 or B2 will occur.

The land proposed for development currently comprise primarily hard standing around all elevations of the building. The River Taff is situated 0.2km west of the development site, and an area of woodland 0.3km east of the site, however, both habits are separated by a busy high street and further commercial buildings

¹https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/6565ccf1517d747aa68af45c/1701170419121/Briefing_Paper_BwN_and_Planning_Policy_in_Wales_v1.0.pdf

² [P/24/0158 | Conversion of first and second floors to 12 self contained flats and associated external alterations | 68 High Street Merthyr Tydfil CF47 8AE](#)

so therefore, there are no continuous terrestrial habitats that could act as an ecological corridor between the site and the surrounding landscape.

Avoidance has not been possible on site as the site owners do not own any alternative sites suitable for such a development. However, due to the only habitat on site being hard standing, the site has very low ecological value, and therefore, with the incorporation of green infrastructure in the new development, the new plans will enhance the area's ecological value, biodiversity, and connectivity to the wider landscape.

Green Infrastructure Proposed on Site

The landscaping plans for the above site, have been reviewed in relation to the recently revised Green Infrastructure requirements.

As the proposed development comprises primarily hard standing, there is limited scope for a range of additional planting. Therefore, green infrastructure within the proposed development will include the use of vertical gardens and plant pots towards the rear of the building (see Plan 1). This therefore maximises the limited space the development holds. These green walls offer several environmental benefits, such as improved air quality, increased biodiversity, and stormwater management. Plants suggested for the green wall include a range of ornamental grasses and honeysuckle (*Lonicera periclymenum*). Honeysuckle is a highly valuable plant for wildlife, supporting a range of species as it provides shelter and foraging for birds, nectar for pollinators and leaves for invertebrates such as caterpillars.

The green wall can also incorporate ferns such as bird's nest fern (*Asplenium*) because they are broadly adaptive and humid-resistant, as well as the inclusion of vines (a climbing or trailing woody-stemmed plant) due to their fruits and seeds that attract several species of insects, birds and mammals. Clematis will be incorporated, specifically 'Bill MacKenzie' (*Clematis tangutica*) as it provides nectar and pollen for bees, and if the seedheads are left in place, birds will take the material to use for their nests in spring.

Plants suggested within the plant pots that will be incorporated within the final development will include a range of native species including but is not limited to, Viper's bugloss (*Echium vulgare*), yellow rattle (*Rhinanthus minor*), meadow crane's-bill (*Geranium pratense*), and dog rose (*Rosa canina* agg.). These plants are great for pollinators, and they also provide cover for mammals.

These new features combined will create new wildlife corridors and connect to the wider landscape such as the River Taff that runs 0.2k west of the site and an area of woodland just 0.3km east of the site which forms part of the wider green infrastructure of which the site will form a part of, and riverbanks which will provide continuity of habitats. These features will also act as navigational landmarks for species such as bats and can also provide protection from predators. The additional green planting will help tie the development to its surroundings and create and substantially improve the ecological value

Overall, these plant species make a great choice in creating a diverse and thriving ecosystem within the proposed plans.

2. Building with Nature Standards Framework

The development has also met several of the green infrastructure standards as outlined in the Building with Nature Standards Framework³. The Building with Nature Standards Framework 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 create a solid foundation for the delivery of high-quality green infrastructure through design, planning and development.

2.1. Core Standards

The core standards are detailed below: together with details of how they are being met on site.

Standard 1: Optimise Multifunctionality and Connectivity – The green infrastructure incorporated within the new development proposals optimises multifunctionality and connectivity within the boundary of the project and links with existing and planned for green infrastructure in the surrounding area. This is by the added green wall and planting as the surrounding area of the development is very limited due to its urban environment. By the inclusion of green walls and additional planting, this will help to provide a more physical habitat connection between the amenity space just south of the site, and the River Taff corridor that runs west of the site.

Standard 2: Positively Responds to the Climate Emergency – The green infrastructure is designed to be climate resilient by incorporating mitigation and adaptations that respond to the impacts of climate change. This can be met within the development by the increased enhancement of planting of the green wall, as it will play a crucial role in air purification. The plants in these gardens act as natural air filters by absorbing harmful pollutants and releasing cleaner air. Through photosynthesis, plants also absorb carbon dioxide and release oxygen, contributing to a healthier and cleaner atmosphere. The inclusion of ornamental native grasses is especially good for climate change and supporting biodiversity, as they sequester more carbon and require less water than other plants.

Standard 3: Maximises Environmental Net Gain – The green infrastructure is designed to actively mitigate any unavoidable harmful environmental impacts of development on soil and air quality, and to minimise light and noise pollution. The development meets this by including a number of plants within the green wall and plant pots that provide shade and evapotranspiration to help reduce day-time temperatures.

Standard 4: Champions a Context Driven Approach - Not considered relevant for this site. We are not aware of any stakeholder feedback informing the green infrastructure layout, features and design.

Standard 5: Creates Distinctive Places – The green infrastructure is integral to the project and is designed to reinforce local distinctiveness and/or create a distinctive sense of place. Currently, the site has limited habitats and therefore has low ecological value, due to the majority of the site comprising hard standing. Therefore, the new proposals will increase the sites quality and distinctiveness by the creation of

³https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/6351513d1afee236d4cf6ce8/1666273600232/Building_with_Nature_Standards_Framework_2.0_Oct22_Download_Version.pdf

new green walls and additional planting throughout the site which together will make good placemaking communities and the natural environment.

Standard 6: Secures Effective Place-Keeping - It is unknown to what extent place-keeping has been undertaken.

Standard 7: Brings Nature Closer to People - The green infrastructure proposed on site within a housing development will be readily available to the occupiers of the new houses.

Standard 8: Supports Equitable and Inclusive Places – The green infrastructure is designed to encourage and enable everyone, including those from vulnerable or excluded groups, to use and enjoy it, to help reduce health inequalities and to build a shared sense of community and belonging. The development meets this standard as it will provide associated infrastructure such as bike racks/parking within the proposals, which support accessibility for all.

Standard 9: Delivers Climate Resilient Water Management – The new proposed development does not incorporate any above ground features to manage flood risk, maintain the natural water cycle and improve the quality within the boundary of the project. Therefore, the site would benefit from such features whereby the standard is to seek to do this by recognising solutions that mimic the role of natural hydrology, managing and using rainwater close to where it falls and creating a controlled flow of clean water at source. This nature-based solution approach to water management avoids an over-reliance on 'grey infrastructure' and delivers multiple benefits including introducing different types of habitats, providing greater resilience to extreme weather events and improving resource efficiency.

Standard 10: Brings Water Closer to People – The development proposals do not include any blue infrastructure design due to the absence of waterbodies within the site boundary; therefore, this principle cannot be met.

Standard 11: Delivers Wildlife Enhancement – The green infrastructure optimises long term and climate-resilient net benefits for nature, by enhancing existing ecological assets such as the green wall and additional planting which creates locally relevant new habitats within the boundary of the development. This in turn will support the conservation status of priority species and habitats and delivers positive benefits for wildlife, within and beyond the boundary (and life) of the development.

Standard 12: Underpins Nature's Recovery – The green infrastructure creates effective links with existing and planned networks and features beyond the boundary, by creating linkages, corridors and 'stepping-stones' to them due to the amenity space adjacent to the eastern boundary of the site, and the woodland 0.3km east of the development site.

2.2. Summary of Development and How it Meets the Core Standards

Overall, the development meets the majority of the core standards within the Building with Nature Standards Framework.

2.3. Summary of How Stepwise Approach has been Followed

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The table below sets out the stepwise approach taken in assessing impacts of a development on habitats and the species.

Table 1: Stepwise approach

	Steps	Assessment	Enhancement	Long term Maintenance	Net Benefits
1	Avoid	N/A	N/A	N/A	N/A
2	Minimise	N/A	N/A	N/A	N/A
3	Mitigation/restore	N/A	N/A	N/A	N/A
4	Compensate on site	Landscaping provided to enhance the sites ecological connectivity		Landscaping for newly created habitats provided	Yes

2.4. Summary of Development and How it Results in Net Biodiversity Benefits

Overall, there will be ecological enhancement and biodiversity net gain proportionate to the scale of the development. This will be undertaken by integrating such green infrastructure into the development proposals. The development will protect and enhance the ecosystems within and adjacent to the site, ensuring that they continue to support diverse habitats and species, allowing them to adapt to change. The plans will also enhance the green infrastructure on site in a way that increases resilience to the changing climate and provide protection for people and places.

3. References

Building with Nature (2023) *Delivering High Quality Green Infrastructure In Wales*. Available at: https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/6565ccf1517d747aa68af45c/1701170419121/Briefing_Paper_BwN_and_Planning_Policy_in_Wales_v1.0.pdf

Building with Nature Standards Framework (2023) Available at: https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/6351513d1afee236d4cf6ce8/1666273600232/Building_with_Nature_Standards_Framework_2.0_Oct22_Download_Version.pdf

Planning Policy Wales (2024) Available online at https://www.gov.wales/sites/default/files/publications/2024-02/planning-policy-wales-edition-12_1.pdf

Plan 1: Green Infrastructure Recommendations



Appendix 1: Background to Requirements for Green Infrastructure Assessments

Background

On 11th October 2023 the Welsh Government issued updated National Planning Policy for chapter 6 of Planning Policy Wales.

The updated policy guidance recognises the value of green infrastructure within the built environment. In order to facilitate a quality built environment enhanced by integrated green infrastructure all planning applications must now include a green infrastructure statement.

"6.2.6 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 (Paragraph 6.4.21) has been applied."

Figure 1 below sets out the summary of the stepwise approach as set out in the Annex2 to the published advice

