



**Former Mount View Surgery,
Bridge Street, CF48 4QU**

Green Infrastructure Statement

April 2024

DOCUMENT CONTROL

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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 development proposals involve the conversion and increased height of the present building into residential flats, precisely two, and will include the erection of a bin store and enclosures, as well as associated parking for five cars.

The land proposed for development comprises one derelict structure, with the majority of the surrounding area within the red line boundary comprising bare ground. The habitats surrounding the structure include lines of trees and scrub to the east, and a large patch of open grassland to the north. Some of the trees have also been recently felled. The River Taff is situated 12m to the east of the site, with open grassland bordering its eastern bank. Though not completely continuous, these habitats act as an ecological corridor between the building and the surrounding landscape. Consequently, the site provides moderate-quality bat foraging and commuting habitat.

¹

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

Avoidance has not been possible on site as the site owners do not own any alternative sites suitable for such a development. However, the habitats proposed for complete clearance have low ecological value (notwithstanding bat roost is present within the building), and therefore, with the incorporation of green infrastructure in the new development, the new plans will enhance the area's ecological value, connectivity, and biodiversity to the wider landscape. A planning application has been submitted under reference P/24/0026².

1.4. Green Infrastructure Proposed on Site

The landscaping plans for the above site, has been reviewed in relation to the recently revised Green Infrastructure requirements. Existing proposals are included within Appendix 1. Within the proposed development, green infrastructure has been incorporated into the new plans by having additional planting around the perimeter of the site, specifically the northern boundary and throughout the centre of the site, with added amenity shrubbery places and scattered silver birch trees. Plants proposed within the shrubbery spaces include holly (*Ilex*), which is a great plant for bringing wildlife into the gardens due to its prickly foliage which acts as a security barrier, and the berries provide the perfect food source.

Fortune spindle (*Euonymus fortune*) is also proposed, which is also beneficial for wildlife because their leaves provide habitat for insects and small animals, while the flowers of the plant attract bees and other pollinators. Therefore, these plant species make a great choice in creating a diverse and thriving ecosystem within the proposed plans. Scattered silver birch (*Betula pendula*) is proposed around the eastern boundary and throughout the centre of the development site. The inclusion of silver birch will play a crucial role in fighting climate change and supporting wildlife and biodiversity. Its catkins provide an early source of pollen and nectar for bees and other pollinators, which in turn will help to sustain their populations. The tree's seeds are a valuable food source for birds, including goldfinches and siskins, while the canopy offers nesting sites and shelter for a range of bird species. The planting of these trees is especially important for a wide range of functions, including summer shade and cooling, sequestering carbon, improving air quality, providing habitat for wildlife, and reducing flood risk. Silver birch trees are also known to improve soil quality, due to their roots bringing inaccessible nutrients into the tree, which are then recycled on to the soil surface when the tree sheds its leaves. There could also be opportunities to extend the tree planting to include more native species and a wider range of species (including non-native species), to increase biodiversity and decrease the risk of losses associated with stresses brought about by climate change.

These new features will create new wildlife corridors and connect to the wider landscape such as the River Taff and its banks which form part of the wider green infrastructure of which the site will form a part of, and river banks 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. Therefore, this additional green planting will help tie the development to its surroundings and create and substantially improve the ecological value

² <https://publicaccess.merthyr.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=S82T2UKQN3V00>

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, such as the large amount of amenity and shrubbery spaces throughout the proposals as well as silver scattered birch trees. This will provide a physical habitat connection between the woodland and the River Taff corridor towards the east for wildlife.

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 and planting of trees around the site which will help with natural carbon capture. This has been met by the inclusion of scattered silver birch trees around the northern boundary and areas within the centre of the site. However, it should be noted that this tree species may become vulnerable to drought in drier areas, and so other tree or shrub species such as hazel (*Corylus avellana*) or blackthorn (*Prunus spinosa*) would also be good to incorporate into the landscaping plans due to them both growing fast and do not take long to begin capturing carbon. Therefore, they are both vital for supporting biodiversity in times of challenging temperatures.

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 scattered trees and treelines which in turn will provide shade and evapotranspiration to help reduce day-time temperatures. The line of trees along the eastern boundary also provides refuges and corridors for climate sensitive species.

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

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very limited habitats and therefore has low ecological value, due to the majority of the site comprising bare ground and small amounts of scrub. Therefore, the new proposals will increase the sites quality and distinctiveness by the creation of new planting towards northern boundary and centre of the site, including the shrubs and trees, which together will make good placemaking communities and the natural environment.

Standard 6: Secures Effective Place-Keeping - Not considered relevant for this site as it is not known what kind of governance structure will be adopted for future management of the green infrastructure.

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 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 a SuDS design; therefore this principle cannot be met. However, it is highlighted that there is a Flood Consequence Assessment⁴ on the site produced by Aegaea (2024) which states in Section 1.17 that the proposals are for a conversion of an existing building, and not a new dwelling so there will be no change in the impermeable surfacing or built footprint. Therefore, total and peak surface water runoff rates and volumes will remain as existing and there will not be an increase to the risk of flooding elsewhere.

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 scattered trees around the site and creating locally relevant new habitats within the boundary of the project, including the mixed shrub planting. 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

⁴ https://enterprise.merthyr.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=11F8C6C121BF473483C1F20827BEFC6B

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'stepping-stones' to them due to the woodland just east of the development site, as well as the River Taff that runs adjacent to the eastern boundary of the 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

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	Compensation for loss of bat roost will be provided Landscaping provided to compensate for loss of habitats will be undertaken	Bird and bat boxes provided	Landscaping for newly created habitats provided	Yes
5	Compensate off site	N/A	N/A	N/A	N/A

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

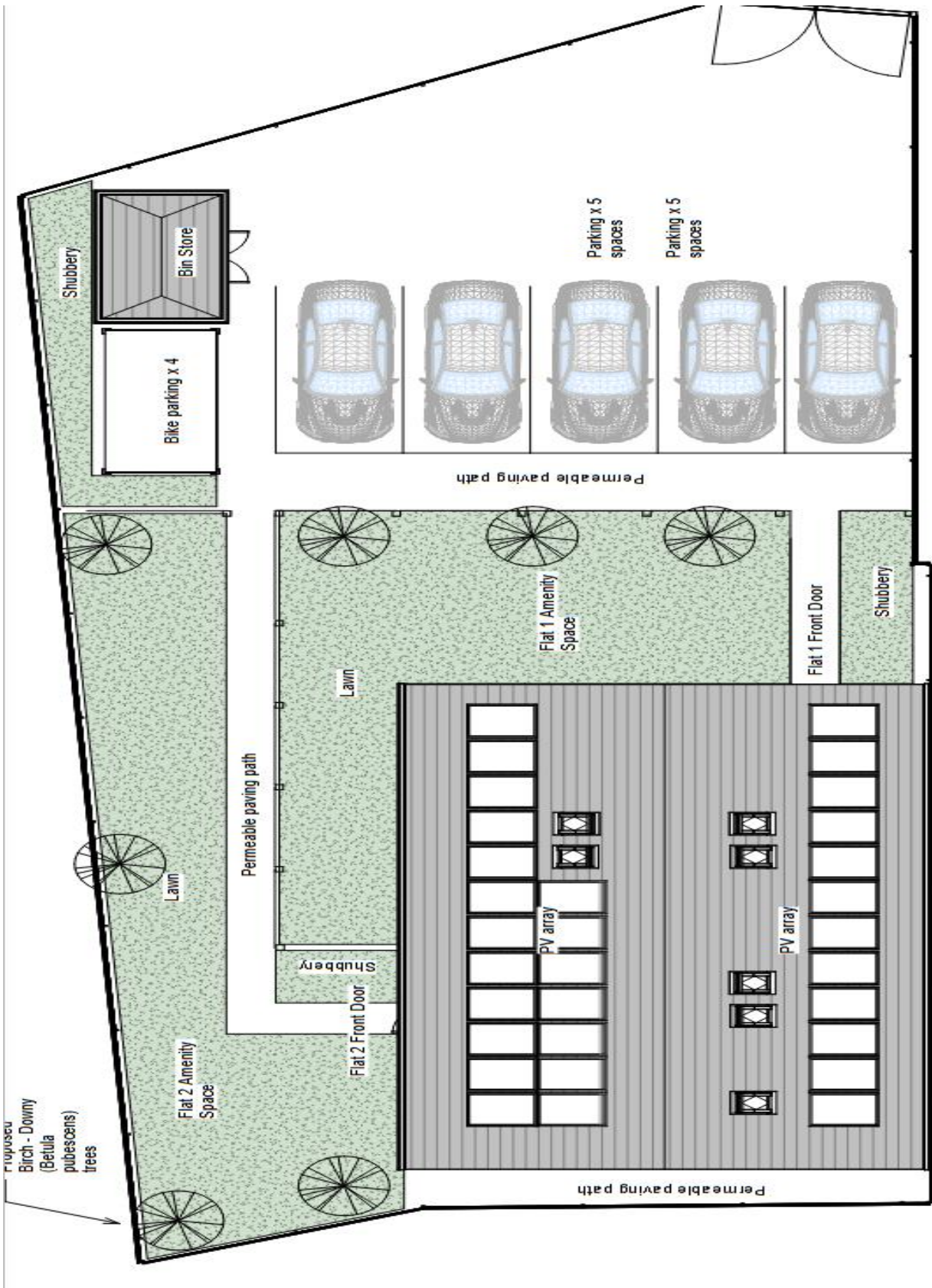
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Appendix 1: Proposed Landscaping Plan



Appendix 2: 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

