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GREEN INFRASTRUCTURE STATEMENT
AFON TAF HIGH SCHOOL, MERTHYR TYDFIL,
CF48 4ED
MERTHYR TYDFIL COUNTY BOROUGH
COUNCIL
WWE24118 GIS

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Disclaimer

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The evidence which we have prepared and provided is true and has been prepared and provided in accordance with the guidance of The Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

Summary

Purpose

Wildwood Ecology was commissioned by Merthyr Tydfil County Borough Council (the client) to provide the ecological elements of a Green Infrastructure Statement for Afon Taf High School, Merthyr Tydfil, CF48 4ED

Where a Green Infrastructure Assessment (GIA) is available from the local council, the report will be aligned to that document. Where a GIA is not available then, where possible, the criteria set by the Building for Nature framework will be used.

The site comprises of one area of grass sports pitch that is to be developed into a multi-use games area (MUGA). The area to be impacted is approximately 0.80 hectares of mown modified grassland.

The GI statement has been aligned to the Step-wise approach and the DECCA enhancement framework (Diversity, Extent, Condition and Connectivity, and Aspects of resilience).

This report covers the ecological aspects of the Green Infrastructure Statement. Any other elements such as arboricultural surveys and assessments, sustainable drainage assessments, green space provision and active travel links etc, should be reported on by the relevant specialists.

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1 INTRODUCTION

- 1.1 Green infrastructure is 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. Some components, such as trees and woodland, are often universally present and function at all levels. At the landscape scale green infrastructure can comprise entire ecosystems such as wetlands, waterways, peatlands, and mountain ranges or be connected networks of mosaic habitats, including grasslands. At a local scale, it might comprise parks, fields, ponds, natural green spaces, public rights of way, allotments, cemeteries, and gardens or may be designed or managed features such as sustainable drainage systems. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks.
- 1.2 A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach has been applied.
- 1.3 In most cases the green infrastructure statement should highlight any baseline data considered and surveys and assessments undertaken, including but not limited to, habitats and species surveys, arboricultural surveys and assessments, sustainable drainage statements, landscape and ecological management plans, open space assessments and green space provision and active travel links.
- 1.4 It is important that biodiversity and ecosystem resilience are considered at an early stage in both development plan preparation and when proposing or considering development proposals. All reasonable steps must be taken to maintain and enhance biodiversity and promote the resilience of ecosystems and these should be balanced with the wider economic and social needs of business and local communities. Where adverse effects on biodiversity and ecosystem resilience cannot be avoided, minimised, or mitigated/restored, and as a last resort compensated for, it will be necessary to refuse planning permission.
- 1.5 Improving ecosystem resilience, particularly improving connectivity to the immediate surroundings, would be a key contribution to on-site avoidance, minimisation, and mitigation strategies and enhancement. How a development would improve the attributes of resilience should be demonstrated as far as reasonably practical.

2 LOCAL POLICY

Merthyr Tydfil County borough Council Policies

Merthyr Tydfil Replacement Local Development Plan (2016-2031)

The following policies in the currently adopted Local Development Plan for Merthyr Tydfil relate to biodiversity and green infrastructure:

Policy EnW1: Nature Conservation and Ecosystem Resilience

Development proposals will be required to promote the resilience of ecosystems. In particular, proposals will be required to maintain and enhance biodiversity interests unless it can be demonstrated that:

1. The need for the development clearly outweighs the biodiversity value of the site; and
2. The impacts of the development can be satisfactorily

Policy EnW2: Internationally and Nationally Protected Sites and Species

Development likely to have an adverse effect either directly or indirectly on the conservation value of an internationally or nationally designated site, including the area, structure and function of designated features, will only be permitted where it is demonstrated that:

1. There is no suitable alternative to the proposed development; and
2. It can be demonstrated that the benefits from the development clearly outweigh the special interest of the site; and
3. Appropriate compensatory measures are secured; or
4. The proposal contributes to the protection, enhancement and positive management of the site.

Development proposals likely to affect protected species will only be permitted where it is demonstrated that:

1. The population size, range, distribution and long-term prospects of the species will not be significantly adversely impacted;
2. There is no suitable alternative to the proposed development;
3. The benefits of the development clearly outweigh the adverse impacts on the protected species; and
4. Appropriate, avoidance, minimisation, mitigation, compensation and enhancement measures are provided.

Policy EnW3: Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species

Development proposals likely to have an adverse impact on Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves, or Priority Habitats and Species will only be permitted where it can be demonstrated that:

1. The need for the development clearly outweighs the conservation value of the site;
2. Adverse impacts on nature conservation features or geological features can be avoided;
3. Appropriate and proportionate mitigation and compensation measures can be provided; and

4. The development maintains and where possible enhances biodiversity and geodiversity interests.

Policy SW11: Sustainable Design and Placemaking

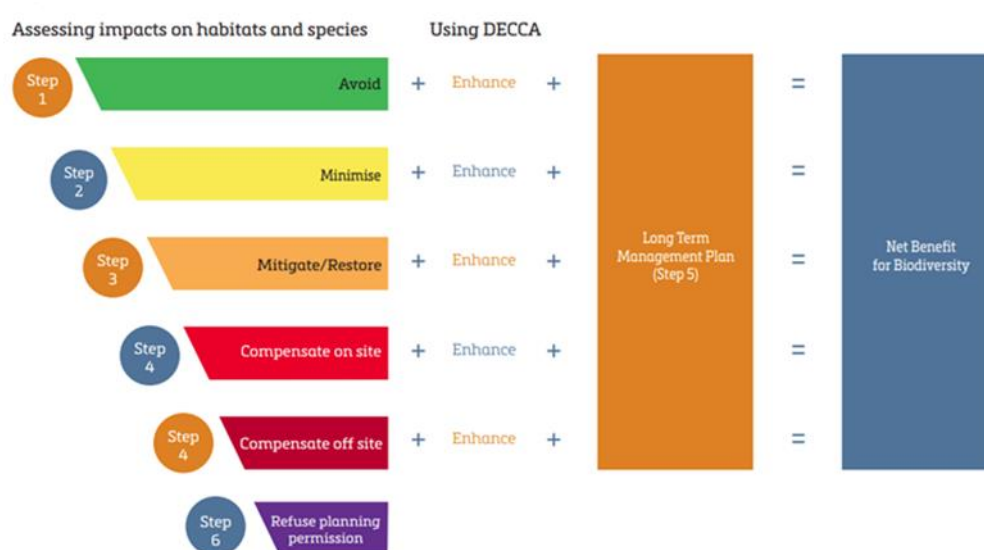
Development must contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design.

Where appropriate new development will be required to:

4. 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;

3 STEP-WISE APPROACH¹

- 3.1 Planning authorities must follow the step-wise approach 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 minimized, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact
- 3.2 Working through the stages of the step-wise approach below and 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. Where biodiversity enhancement proportionate to the scale and nature of the development is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise, it will be necessary to refuse permission. Enhancement measures could include on-site, locally relevant, habitat creation and/or could be part of the development itself favouring the use of native species using biodiverse nature-based solutions such as SUDS, green roofs, grassland management for wildflowers or reptile refugia, woodland expansion, and wetland creation.



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- 3.3 The first priority for planning authorities is to avoid damage to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning. Where there may be harmful environmental effects, planning authorities will need to be satisfied that any

¹ Taken from 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

reasonable alternative sites (including alternative siting and design options) that would result in less harm, no harm or benefit have been fully considered.

- 3.4 Proposals in statutory designated sites are, as a matter of principle unacceptable, and therefore must be excluded from site searches undertaken by developers. This principle also extends to those sites containing protected species and habitats which are irreplaceable and must be safeguarded. Such sites form the core of resilient ecological networks and their role and the ecosystem services they provide must be protected, maintained and enhanced and safeguarded from development. It will be wholly exceptional for development to be justifiable in such instances.
- 3.5 When all locational, siting and design options for avoiding damage to biodiversity have been exhausted, applicants, in discussion with planning authorities must seek to minimise the initial impact on biodiversity and ecosystems by:
 - maintaining the largest possible area of existing habitat supporting biodiversity and functioning ecosystems, particularly Section 7 habitats and species where present, by minimising development size and appropriate orientation on site, paying due regard to the potential for continued long term maintenance and management of retained areas to benefit biodiversity;
 - ensuring that retained habitats continue to be well connected to adjacent habitats to provide connectivity for key species and ensuring that the favourable conservation status of local species populations is maintained;
 - retaining existing features, develop a management plan for their future care (e.g., trees, hedgerows, species rich grasslands, heath, wetlands, ponds and freshwater habitats) and use appropriate buffers to protect these from construction and operational impacts, and
 - using proven innovative/creative solutions (where required) to minimise damage and maintain existing biodiversity features and ecosystems in tandem with robust monitoring and rectification strategies.
- 3.6 Where, after measures to minimise impact, biodiversity and ecosystems could still be damaged, or lost through residual impacts, the proposed development should mitigate that damage. Mitigation measures must be put in place to limit the negative effects of a development.
- 3.7 Effective mitigation or restoration measures should be incorporated into the design proposal following the consideration of steps one and two above. Mitigation or restoration measures must be designed to address the specific negative effects by repairing damaged habitats and disturbed species. They should seek to restore more than like for like, accounting for disturbance and time lags for the recovery of habitat and species, and in every case, mitigation or restoration measure should seek to build ecosystem resilience

within the site and where possible the wider area. In some circumstances, where like for like mitigation measures are not possible, particularly in respect of restoration measures, it may be necessary to consider on site compensation measures in the first instance. In designing mitigation measures where uncertainty exists, applicants should follow the precautionary principle and assume a significant effect. Off-site compensation measures (as set out in step four below) should be considered as a last resort.

- 3.8 As a last resort should all the above steps be exhausted, offsite compensation for unavoidable damage must be provided. This must be of significant magnitude to fully compensate for any loss.
- 3.9 Prior to offsite compensation to secure biodiversity outcomes, site modifications, alternative sites, conditions, or obligations onsite should be considered.
- 3.10 In the absence of a planned approach, compensation measures must be guided by place-based evidence and the onus is on applicants to address the following:
 - Off-site compensation should normally take the form of habitat restoration, or habitat creation, or the provision of long-term management agreements to enhance existing habitats and deliver a net benefit for biodiversity. It should also be informed by a full ecological assessment to establish a formal baseline before habitat creation or restoration starts and secured far enough in advance before the loss of biodiversity on site.
- 3.11 Each stage of the step-wise approach must be accompanied by a long-term management plan of agreed and appropriate avoidance, minimisation, mitigation/restoration and compensation measures alongside the agreed enhancement measures. The management plan should set out the immediate and on-going management of the site, future monitoring arrangements for all secured measures and it should clearly identify the funding mechanisms in place to meet the management plan objectives. The management plan must set out how a net benefit for biodiversity will be achieved within as short a time as possible and be locally responsive and relevant to local circumstances.
- 3.12 Finally, where the adverse effect on biodiversity and ecosystem resilience clearly outweighs other material considerations, the development should be refused.

4 DECCA FRAMEWORK

Local Planning Authorities must also take account of and promote the resilience of ecosystems. This is achieved by following the attributes of the DECCA framework:

- diversity between and within ecosystems;
 - the extent or scale of ecosystems;
 - the condition of ecosystems including their structure and functioning;
 - the connections between and within ecosystems; and
 - adaptability of ecosystems including their ability to adapt to, resist and recover from a range of pressures likely to be placed on them through climate change for example.
- 4.1 **Diversity:** at a biological level, including at the genetic, species, habitat, ecosystems or sea/landscape scale, as well as at the geological and physical level underpins biodiversity, resilient ecosystems, their functioning and the delivery of important ecosystem services. More diverse ecosystems are more resilient to external influences (this includes biological, geological and physical diversity on a site). This means strategic planning and individual development proposals should avoid negative impacts on biodiversity, by considering how biodiversity assets, can be maintained and enhanced;
- 4.2 **Extent:** to ensure mechanisms allow the identification of potential habitat, the maintenance of existing biodiversity assets and networks and promote the restoration of damaged, modified or potential habitat and the creation of new additional habitat, as ecosystems which are small in extent are less resilient to external influences. This means that strategic planning and individual development proposals must avoid loss in the extent of biodiversity and incorporate measures to appropriately maintain and enlarge existing habitats, especially where extent is small or declining, through habitat restoration and creation with adjoining and nearby areas, green infrastructure features and networks;
- 4.3 **Condition:** ecosystems and biodiversity assets need to be in a healthy condition to function effectively, to deliver a range of important ecosystem services and be more resilient to external influences. Ecosystem health can be adversely affected by a range of pressures including land use and climate change, pollution, Invasive Non-Native Species (INNS) and over-exploitation as set out in SoNaRR. Good condition requires sufficient scale and functioning natural processes or appropriate management to provide structural complexity and sustain diverse mosaics of habitats. Strategic planning and individual development proposals must not compromise the condition of ecosystems. By taking an integrated landscape approach to development, for example, which considers both direct, indirect, and cumulative impacts and benefits, and seeks to reduce pressures it should be

possible to make a positive contribution. Planning for and securing the long-term management of retained habitats is key to maintaining condition through for example, the use of planning obligations;

- 4.4 **Connectivity:** to take opportunities to develop functional and physical connectivity of biodiversity and ecological networks within and between ecosystems and across landscapes, building on existing connectivity and quality and encouraging habitat creation, restoration and appropriate management, including the links within and between habitats, allows species to forage, breed and migrate and respond to climate change and other pressures, as well as enabling the flow of natural processes (however, measures should be taken to prevent undesired flows such as INNS and nutrients). The opportunities to be taken at a strategic level could include enlarging habitat areas, developing buffers around designated sites or other biodiversity assets or corridors, including transport and river corridors, removal of barriers and the creation of 'stepping stones' which will strengthen the ability of habitats and ecological networks to adapt to change, including climate change. Individual development proposals should identify and incorporate measures which enable appropriate links to be made between the site and its surroundings so as to improve connectivity; and
- 4.5 **Adaptation:** resistance and recovery from pressures arise when the attributes of ecosystem resilience – diversity, extent, condition and connectivity of ecosystems are in good condition. Habitats and species are not static: planning for nature recovery should aim to sustain habitats and associated species as the geography and land use changes around them, harnessing natural processes and opportunities for nature-based solutions. This means that strategic planning and individual development proposals should identify impacts to the ecosystem resilience attributes of biodiversity, using the pressures identified in SoNaRR. They should incorporate measures to ensure that biodiversity's ability to adapt to, resist and recover from pressures is enhanced. Enhancement of resilient ecological networks and securing and enhancing green infrastructure will be keyways of achieving this, as well as facilitating social and economic resilience aspirations of the Well-being of Future Generations Act.

Ecosystem services

- 4.6 The UK National Ecosystem Assessment states that ecosystem services are 'the benefits provided by ecosystems that contribute to making life both possible and worth living.
- 4.7 The concept of ecosystem services has been developed to improve understanding of the impact that ecosystems have on people's lives and to help guide human use and management of the earth's natural resources.

Ecosystem services are grouped into four main categories

- **Supporting services** – not of direct benefit to people, but essential to the functioning of ecosystems and so indirectly responsible for all other services. Includes water cycling, nutrient cycling, soil formation and the processes of plant growth;
- **Regulating services** – often not attributed to real monetary value in conventional markets, but of direct benefit to people. Includes regulating climate, flooding, water quality, air quality, erosion, and pollination;
- **Provisioning services** – the supply of goods that are of direct benefit to people. Includes food, timber, fresh water, fuel, and pharmaceuticals.
- **Cultural services** – non-material direct benefits of huge importance to the wider social and cultural needs of society. Includes recreational space, tourism, spiritual enrichment, inspiration, reflection, and employment.

5 BASELINE SUMMARY

- 5.1 All developments must deliver a net benefit for biodiversity (NBB) and ecosystem resilience enhancement from the baseline state (proportionate to the scale and nature of the development proposed). Even if the biodiversity value has been maintained, and potential impacts have been avoided, minimised, mitigated for, or compensated for, there must still be a pro-active process to look for and secure enhancement through the design and implementation of the development.
- 5.2 In most cases the green infrastructure statement should highlight any baseline data considered and surveys and assessments undertaken, including but not limited to, habitats and species surveys, arboricultural surveys and assessments, sustainable drainage statements, landscape and ecological management plans, open space assessments and green space provision and active travel links.
- 5.3 The baseline summary of habitats is provided in the tables below. Each table refers to an identified and assessed habitat within the site boundary and directly adjoining.
- 5.4 The offsite enhancements contained in the report are proposals put forward by the deputy head and are, as yet to be confirmed and funded.
- 5.5 The baseline information was obtained through the following field surveys undertaken at the site following the current and appropriate guidelines.
 - Phase 1 habitat survey – 18/06/2024
 - The UKhab Classification system has been used for this report. Distinctiveness and condition assessments were taken from the DEFRA BNG standard tool.

Afon Taf High school sports pitch

Table 1 - Summary of primary habitat in the proposed development area.

Habitat reference/type	G4 Modified grassland Secondary code/s: 108 Frequently mowed, 814 Educational premises open space 820 Natural sports pitches 822 Recreational ground
Location details	South of the athletics track within the school boundary
Area (ha or M ² /number)	0.80ha
Distinctiveness	Low
Condition	Poor
Species list	Creeping buttercup (<i>Ranunculus repens</i>) broadleaved plantain (<i>Plantago major</i>) daisy (<i>Bellis perennis</i>) perennial ryegrass (<i>Lolium perenne</i>) white clover (<i>Trifolium repens</i>) yarrow (<i>Achillea millefolium</i>)

	Yorkshire fog (<i>Holcus lanatus</i>)
Management	Mown by the council on a two-week rota between May and September.

Afon Taf High school sports pitch boundaries

Table 2 - Summary of the retained habitat on the boundaries of the proposed are of development.

Habitat reference/type	G3C - other neutral grassland
Location details	Eastern, western and southern boundary of the proposed area of the MUGA - closest points are North-eastern: 10m Western: 20m South-western: 45m
Area (ha)/ number	0.32ha of linear features
Distinctiveness	Moderate
Condition	Good
Species list	Ash (<i>Fraxinus excelsior</i>), beech (<i>Acer pseudoplatanus</i>), bindweed (<i>Convolvulus arvensis</i>), bramble (<i>Rubus fruticosus</i> agg), broadleaved plantain (<i>Plantago major</i>), cleavers (<i>Galium aparine</i>), creeping buttercup (<i>Ranunculus repens</i>), daisy (<i>Bellis perennis</i>), giant butterbur (<i>Petasites japonicus</i>), hogweed (<i>Heracleum mantegazzianum</i>), holly (<i>Ilex aquifolium</i>), ivy (<i>Hedera helix</i>), oak (<i>Quercus</i> sp.), perennial ryegrass (<i>Lolium perenne</i>), Queen of the meadow (<i>Filipendula ulmaria</i>), ribwort plantain (<i>Plantago lanceolata</i>), thistle sp (<i>Cirsium</i> sp.), white clover (<i>Trifolium repens</i>), yarrow (<i>Achillea millefolium</i>), Yorkshire fog (<i>Holcus lanatus</i>)
Management	No management – to be retained

Afon Taf High School sports pitches Step-wise and DECCA assessment

Habitat / Feature / Area of Concern	G4 Modified grassland
Baseline Summary	The modified grassland area which formed the sports pitches onsite was of little ecological value and resilience. However, they are likely to provide basic food supplies for some ground feeding bird species as well as providing some ecosystems services value by their supporting and cultural services. The modified grassland onsite is regularly mown and therefore does not currently allow for a diverse range of species to grow.
Proposed Step-Wise avoid/minimise/mitigate/compensate onsite. Compensate offsite	The whole of the 0.80 ha area of modified grassland will be lost. This loss cannot be avoided as the area is the only suitable location for a development that will provide supporting and cultural facilities at the school for many years. There is no capacity within the development boundary to minimise or compensate the impact due to the replacement facility being of a specific size to match the facilities provided by the sports pitches located on the modified grassland. Compensation is hoped to be provided by pending future school projects. By enhancing the “wildlife area” to the south of the site. This small area of the site is owned by the school and is managed and maintained as a wildlife area with dedicated paths through the site that provides an opportunity to enhance the cultural and supporting services of the site. The compensation will take the form of additional planting of fruit trees in the small orchard in the wildlife area to the south of the site. It is hoped to increase the diversity of the site by planting a variety of species to complement the plants that are currently present in the wildlife area. The plants selected will be species that are attractive to pollinators. There is a possibility for the creation a small pond which will be used to enhance the environment, provide a greater diversity to the area, and also

	provide educational opportunities for students studying for Geography and Science. Should these proposed compensation measures come to fruition they will increase the diversity of the area and provide a connectivity corridor between the river to the west and the railway embankment to the east. They have the potential to provide to the ecosystem services by contributing to a better quality of air and provide a food source.
Proposed DECCA Enhancement	The new fruit tree planting as proposed will increase the extent of trees, as part of potential compensation. Once established and fruiting, they will provide enhanced foraging opportunities for invertebrates and birds plus an increase in diversity for pollinators. The proposed planting of wildflowers and the creation of a pond will increase the extent of the onsite habitats and with a mix of habitats i.e. trees, flowers, grasses and a waterbody which will in turn provide greater resilience to the site. The proposals will enhance the wildlife area and provide connectivity between habitats to the east and west and a protective corridor for species that may be present in the habitats . With a variety of proposed habitats in the wildlife area it will become more resilient to change.
GI Value (ES)	The condition of the modified grassland in its current state of a well-maintained recreational area is poor and offers no significant input to ecosystem services. The MUGA will offer similar attributes, however the proposed compensation will increase ecosystem services across the wider site. The introduction of more trees and vegetation will improve regulating services by contributing to improving air quality and pollination. Provisioning services will be improved through the planting of more fruit trees by providing food sources for both humans and animals. Cultural services will be improved by the MUGA by offering a place for recreation, for a number of sports, above and beyond the current grass

	pitches, The enhanced wildlife area will provide recreational and educational opportunities. Includes recreational space, tourism, spiritual enrichment, inspiration, reflection, and employment. Additionally; proposing a pond within grassland areas there will be a significant benefit for wildlife that have both terrestrial and aquatic phases, such as amphibians, and some reptiles. This will help create the potential for a closer connection to nature (cultural), and a supportive service enhancement for specific species needs.
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Habitat / Feature / Area of Concern	g3c Neutral grassland
Baseline Summary	The neutral grassland areas around the proposed development will be retained. They offer some diversity and provide small corridors of connectivity to the habitats to the west, south and east. They provide food supplies for invertebrates, ground nesting opportunity to birds and resting places for reptiles and small mammals
Proposed Step-Wise Avoid	The proposed area of the MUGA will not impact this habitat, which will be retained.
Proposed DECCA	The diversity and condition of this habitat will be maintained.
GI Value (ES)	The retained habitat will continue to contribute to current levels of ecosystem services such as pollination, soil formation and the processes of plant growth.

6 CONCLUSION

The proposed offsite enhancements are limited by the requirement of the school to secure funding and approval, but from significant step forward in developing opportunities for education and wildlife around the whole of the school site.

The improvement of the habitats within the wildlife area comes from planting fruit trees, a diverse grassland with wildflowers, and a proposition of a pond – together, these provide connectivity for a range of species across and around the whole school site.

The range of habitats proposed also increases the recreational attractiveness to the area providing a long-term space for recreational and educational purposes.

The proposed offsite enhancements are contributing to an improving Ecosystem Resilience (ER), and in the process also producing a series of improved Ecosystem Service (ES) contributions.

Further enhancements could be provided to the site including:

- bird boxes; A variety of 25mm and 32mm hole boxes suitable for common bird species.
- bat boxes; similar to the 2F Schwegler general purpose bat box for crevice dwelling bats.
- bee hotels
- hibernaculum – log/rock and leaf piles in sunny locations for supporting reptile, amphibians and invertebrates.

The package of proposed offsite enhancements, and their resultant NBB, ER, and ES, are to be pursued by the educational staff at the school and local authority.

APPENDIX I: LEGISLATION

Planning Policy Wales – Edition 12 (2024) and Technical Advice Note 5 (2009)

Planning Policy Wales (Edition 12, February 2024) sets out the land use planning policies of the Welsh Government, integrating with the Environment (Wales) Act (2016). The advice contained within Planning Policy Wales (PPW) is supplemented for some subjects by Technical Advice Notes (TANs).

Section 6.2 of Planning Policy Wales (Edition 12) describes how elements of Green Infrastructure should be incorporated into new 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. 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 6.4.15) has been applied.”

Section 6.4 of Planning Policy Wales outlines how all developments should achieve net benefit for biodiversity by implementing the DECCA framework. Paragraph 6.4.5 states: “Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species (not including non-native invasive species), locally or nationally and must work alongside nature and it must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems. A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and long-term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site. The step-wise approach outlined below is the means of demonstrating the steps which have been taken towards securing a net benefit for biodiversity. In doing so, planning authorities must also take account of and promote the resilience of ecosystems, in particular the following attributes, known as the DECCA Framework:

Section 6.4.15 outlines how the step-wise approach should apply to all new developments.

TAN 5 (Welsh Government, 2009) specifically provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. The TAN provides advice for local planning authorities on the key principles of positive planning for nature conservation; nature conservation and Local Development Plans; nature conservation in development management procedures; development affecting protected internationally and nationally designated sites and habitats; and development affecting protected and priority habitats and species.

Under Section 2.4 within the TAN 5, ‘when deciding planning applications that may affect nature conservation local planning authorities should’:

- Pay particular attention to the principles of sustainable development, including respect for environmental limits, applying the precautionary principle,

using scientific knowledge to aid decision making and taking account of the full range of costs and benefits in a long-term perspective;

- Contribute to the protection and improvement of the environment, so as to improve the quality of life and protect local and global ecosystems, seeking to avoid irreversible harmful effects on the natural environment;
- Promote the conservation and enhancement of statutorily designated areas and undeveloped coast;
- Ensure that appropriate weight is attached to designated sites of international, national and local importance;
- Protect wildlife and natural features in the wider environment, with appropriate weight attached to priority habitats and species in Biodiversity Action Plans;
- Ensure that all material considerations are taken into account and decisions are informed by adequate information about the potential effects of development on nature conservation;
- Ensure that the range and population of protected species is sustained;
- Adopt a step-wise approach to avoid harm to nature conservation, minimise unavoidable harm by mitigation measures, offset residual harm by compensation measures and look for new opportunities to enhance nature conservation; where there may be significant harmful effects local planning authorities will need to be satisfied that any reasonable alternative sites that would result in less or no harm have been fully considered.

Future Wales: The National Plan 2040

Policy 9 of Future Wales: The National Plan 2040 (Resilient Ecological Networks and Green Infrastructure) states: “In all cases, 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.”

Policy 30 of Future Wales: The National Plan 2040 (Green Belts in the Southwest) states: “The Welsh Government supports the use of Strategic Development Plans to identify and establish green belts to manage urban form and growth in the South-West, particularly around Swansea Bay and Llanelli.”

Policy 34 of Future Wales: The National Plan 2040 (Green Belts in the South-east) states: “The Welsh Government requires the Strategic Development Plan to identify a green belt to the north of Cardiff, Newport, and the eastern part of the region to manage urban form and growth. The Strategic Development Plan must consider the relationship of the green belts with the green belt in the West of England. Local Development Plans and development management decisions should not permit major development in the areas shown for consideration for green belts, except in very exceptional circumstances, until the need for green belts and their boundaries has been established by an adopted Strategic Development Plan.”

Wellbeing of Future Generations (Wales) Act 2015

The Wellbeing of Future Generations (Wales) Act 2015 aims to create:

- A globally responsible Wales;
- A prosperous Wales;

- A resilient Wales;
- A healthier Wales;
- A more equal Wales;
- A Wales of cohesive communities; and
- A Wales of vibrant culture and thriving Welsh language.

As part of the National Well-being Indicator Framework, 46 wellbeing indicators have been identified including Healthy Ecosystems (43) and Biological Diversity (44). These indicators have been identified as central to all seven of the goals that the Wellbeing of Future Generations (2015) Wales Act has set out to achieve.

The Future Generations Commissioner for Wales acts as a guardian for the interests of future generations in Wales, supporting 48 public bodies in assuring sustainable development (defined as acting “in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs”) in line with each of the seven wellbeing goals. The public bodies listed within the act include Natural Resources Wales, Local Authorities and National Park Authorities. Therefore, planning proposals submitted to the aforementioned parties should be in aligned with the goals listed within the Wellbeing of Future Generations (Wales) Act 2015, and should aim to have a positive impact on the indicators identified with the National Well-being Indicators Framework.

APPENDIX II: BIBLIOGRAPHY

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.

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Local planning policy/ BAP as applicable