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Green Infrastructure Statement

Merthyr Tydfil Premier Inn

On behalf of Premier Inn Hotels Ltd

MAY 2024

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I INTRODUCTION

- I.1 This Green Infrastructure Statement has been prepared by Walsingham Planning on behalf of Premier Inn Hotels Ltd in relation to a proposed development at the Merthyr Tydfil Premier Inn (PI), within the settlement of Merthyr Tydfil.

2 SITE CONTEXT

- 2.1 The proposal relates to the Merthyr Tydfil Premier Inn accessed off Duffryn Rd within the town of Merthyr Tydfil. The existing Premier Inn is a two-storey hotel providing 62 bedrooms. There is an on-site Table Table restaurant alongside 115 on-site parking spaces.
- 2.2 This site is adjacent to the main A4060 Highway which borders the site along the western boundary. The site is split into two areas between north and south. The northern part of the site relates to Pentrebach House (a Grade II listed building) which has been converted into the Table Table restaurant with associated car parking to the east and south of the building. There is a large, grassed area to the west of the building forming the principal grounds to the building which includes several mature trees. The southern part of the site accommodates the Premier Inn hotel with associated car parking to the north and east of the building. To the west and south of the hotel there are several mature trees and a hedgerow along the western boundary.
- 2.1 The site is located within the settlement boundary of Merthyr Tydfil within the Pentrbach area. It is primarily surrounded by residential properties to the east and west as well as a care home to the north. Further north is the Triangle Business Park and further South are Playing Fields.
- 2.2 Figure 1 below provides an aerial image of the site and its immediate context.

Figure 1: Site Context Plan (Google Earth Satellite Image)



2.3 Regarding existing on-site habitats the site is characterised by the following:

- Buildings (ulb5).
- Hard standing (ulb).
- Modified grass (g4).
- Introduced shrubs (ul 867).
- Scattered trees (ul 32).
- Woodland (wl).

2.4 There are no designated sites within or adjoining the site. The nearest designated site relates to Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI) approximately 1.2km from the site.

3 THE PROPOSAL

3.1 It is proposed to create additional hotel accommodation for the PI in the form of an extension and include a breakfast room within the existing hotel building. The proposed extension will be located to the south of the site where existing vehicle parking is currently located. The two-storey extension will provide 16 bedrooms and will extend directly from the existing hotel's southern elevation. The proposed breakfast room would provide 38 covers and would be for the use of guests of the hotel. Consequently, it is considered ancillary to the primary CI hotel use. The inclusion of the breakfast room in the existing building will result in the loss of four bedrooms resulting in a total net gain of 13 bedrooms to the hotel through the proposed extension.

3.2 Figure 2 shows the proposed layout for the scheme.

Figure 2: Proposed Site Layout



3.3 The proposed extension will result in the loss of a small area of modified grassland and 4 existing trees. The proposed landscaping scheme includes a replacement tree strategy on the site providing a minimum of three replacement trees for every tree lost resulting in 12 new native trees planted throughout the site.

4 POLICY CONTEXT

(A) PLANNING POLICY WALES (PPW)

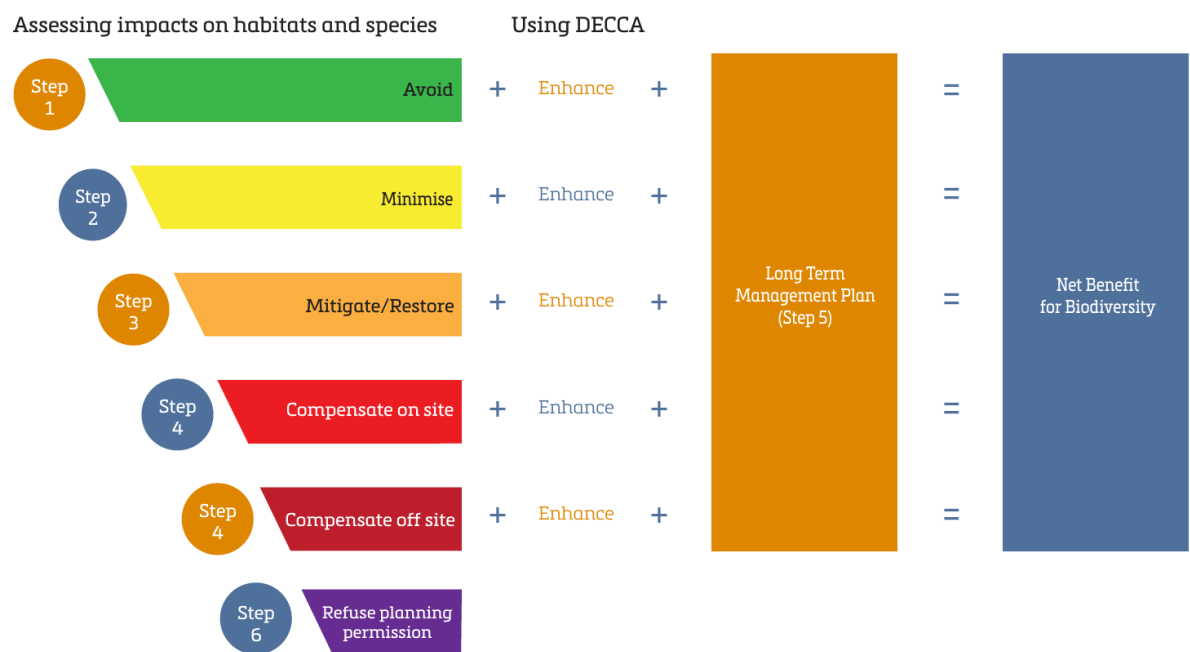
4.2 Chapter 6 of PPW, outlines under paragraph 6.4.12 that a Green Infrastructure Statement is required for submission alongside planning applications to demonstrate the proposal has followed the step-wise approach.

4.3 PPW seeks to ensure all development proposals deliver net benefit for biodiversity and improve the resilience of ecosystems. Biodiversity enhancement must be of a scale and nature which is proportionate to the development. The step-wise approach to biodiversity requires development proposals to follow the below sequence:

- 1. Avoid
- 2. Minimise
- 3. Mitigate
- 4. Compensate

4.4 This is further outlined in Figure 1 below:

Figure 3: Step-wise Approach (Source: Welsh Government, 2024)



5 ECOLOGY AND GREEN INFRASTRUCTURE BASELINE

- 5.1 To establish the ecological baseline of the Site a desk-study and Extended Phase I Habitat survey was undertaken during May 2024 by a qualified professional; Katy Perry, BSc (Hons), MCIEEM, Senior Consultant (Natural England Bat Licence Number: 2022-10404-CL18-BAT, NRW (S092694/I, GCN Licence 2018-35157-CLS-CLS and Dormouse Licence 2020-49929-CLS-CLS).

(A) HABITATS

- 5.2 The site is characterised by a Premier Inn Hotel building and adjacent separate restaurant alongside associated car parking and landscaping. The site is surrounded by residential buildings to the east, west and south, industrial units and warehouses to the north-west and south-east and the river Taff to the south-west in the wider landscape, west of the railway line and main roads. A small storm flow/tributary of the river is present along the west of the site to the south. There are no ponds within 500m. The river has priority habitat deciduous woodland along the embankments, likely a locally designated wildlife site and therefore the wider landscape has a moderate level of biodiversity. The Site contains the following habitats:

- Buildings (u1b5).
- Hard standing (u1b).
- Modified grass (g4).
- Introduced shrubs (u1 867).
- Scattered trees (u1 32).
- Woodland (w1).

- 5.3 The habitats recorded on the site are common, being prevalent at both the local and national level. Consequently, the ecological value of these habitats is considered low. The proposal would result in the loss of existing hardstanding, a small element of modified grassland and 4 existing trees (Silver Birch and Scots Pine).

- 5.4 Additionally, the PEA identifies the presence of Japanese Knotweed, an invasive non-native species, listed on Schedule 9 of the Wildlife and Countryside Act (as amended) 1981. The proposed development is located in close proximity to Japanese Knotweed.

(B) DESIGNATED SITES

- 5.5 The nearest designated site relates to Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI) approximately 1.2km from the site.

(C) PROTECTED SPECIES

- 5.6 There was no conclusive evidence that the Site hosts any invertebrates, bats, birds, reptiles, amphibians, badgers, otters, water vole, dormouse, or hedgehogs. However, the habitats on site likely provide foraging and commuting opportunities for a variety of species.

- 5.7 The table below summarises the likely presence of protected species onsite:

Species Type	Summary	Impact	Mitigation
Invertebrates	No habitat for protected or notable invertebrates is found on site.	None	None
Bats	Potential roost features located on the site are considered to have low value to support roosting bats. Bats could use the woodland and watercourse for foraging along the boundaries within the local landscape for foraging and commuting and could also be used by bats dispersing from nearby roosts outside of the site and commuting around the area.	- No impacts to roosting bats are anticipated with regards to the removal of trees on site. - Existing building features low value to support bat roosts. - Proposed development may lead to an increase in the amount of current lighting of surrounding habitats or the retained building without mitigation.	- Close-up inspection of roosting feature in trees for removal. - Low impact Lighting Strategy - x2 bat boxes.
Birds	No evidence of nesting birds was identified on the building or hard standing; however, birds could use the vegetation adjacent for nesting or foraging.	The proposed development could result in the destruction or the disturbance and subsequent abandonment of active bird nests adjacent to the building.	3-5m buffer should be created between any machinery and active nests until the young have fledged. - x2 Bird boxes

Reptiles	The proposed development site overall does not present high suitability for reptiles due to a lack of suitable habitat, in particular as the working area is only due to impact the hard standing and the existing building.	Buildings and hard standing will be impacted during construction. The loss of such habitats is likely to be inconsequential to local reptile populations owing to their low value.	- Planting of native scrub and grassland to increase foraging opportunities. - Creation of reptile refugia and hibernacula.
Amphibians	The hard standing and building are suboptimal for great crested newts and common amphibians due to a lack of refuge from predation, and lack of connectivity.	Buildings and hard standing will be impacted during construction. The loss of such habitats is likely to be inconsequential to local reptile populations owing to their low value.	Creation of hibernacula.
Badger	No evidence of badgers (e.g. latrines, snuffle holes, hairs) or badger setts were identified on or within influencing distance (30m radius) of the site.	Modified grass and hard standing will be removed during the works. The loss of such habitats is likely to be inconsequential to local badger populations owing to their low value.	- Precautionary mitigation during construction works. - Planting fruit bearing trees and species-rich grassland.
Riparian animals	The river tributary or storm flow to the south and west of the site has heavily shaded banks due to the woodland and has reduced suitability for water voles. However, the watercourse could be used for commuting otter, but as this is a branch off the main river and due to its urban location there is reduced suitability for otters.	None	Precautionary measures for pollution during construction.
Hazel Dormouse	No evidence of dormice was found within the site. It is not anticipated that dormice are present on the site due to the lack of suitable habitats present.	None	None
Hedgehog	The habitat recorded onsite provides a small area of suitable, albeit limited commuting and	The proposed development will result in the loss hard standing. The loss of such habitats is	Precautionary mitigation during construction works.

	foraging opportunities for hedgehogs in the form of shrubs and a more optimal habitats with the fenced off woodland.	likely to be inconsequential to local hedgehog populations owing to their low value.	• Hedgehog houses • Hedgehog Gaps
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6 GREEN INFRASTRUCTURE STRATEGY

- 6.1 In respect of the ecological/GI resource present within and adjacent to the Site, the proposed development has been designed to retain and protect the valued resources listed above and in so doing, deliver net benefits to biodiversity in accordance with Chapter 6 of PPW. This is achieved through adoption of a step-wise approach which ensures that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort, compensated for, with enhancement secured by delivering biodiversity benefits onsite, over and above that required to mitigate or compensate for any negative impact.
- 6.2 The proposal relates to a brownfield site which is in active use and is located within a wider urban area resulting in the ecological value of the site being considered low. However, the site is surrounded by existing mature and semi-mature trees within the site which do represent a potential habitat. A small area of modified grassland and 4 trees will be lost to facilitate the proposed development.
- 6.3 The loss of 4 trees and modified grassland will be mitigated through the introduction of new tree planting within the site and via a landscaping scheme which includes grassland species and native shrub planting. In accordance with PPW the supporting landscaping scheme provides 12 native replacement trees at a 1:3 replacement ratio.
- 6.4 In addition, construction presents a low risk for the spread of Japanese Knotweed, an invasive species, due to construction movements. This can be appropriately managed through the implementation of a Construction and Environmental Management Plan (CEMP).
- 6.5 The proposed development must address the impact of the loss of low value ecological features and an enhancement must be provided that is proportionate to the scale and nature of the proposed development. The proposal relates to minor development and consists of a relatively small two-storey extension to the existing hotel.
- 6.6 PPW advises that biodiversity enhancements can be delivered through the step-wise approach via attaching planning conditions and/or other obligations to a planning permission.
- 6.7 Proposed enhancements include:
- Amphibian/reptile Hibernacula,
 - Beetle banks,
 - Dead wood piles,

- Floral borders,
- Bee bricks,
- Hedgehog houses,
- Hedgehog fence gaps,
- x2 Bird boxes,
- x2 Bat boxes,
- Log piles / invertebrate hotels,
- Inclusion of native planting species such as fruit bearing trees to improve foraging opportunities,
- Low impact lighting strategy.

6.8 The above benefits can be delivered via an Ecological Mitigation and Enhancement Plan. To ensure the proposal delivers net benefits for biodiversity, the following documents are recommended to be conditioned to a recommendation for approval:

- Construction and Environmental Management Plan
- Ecological Mitigation and Enhancement Plan.
- Landscaping details.
- Low impact lighting strategy.

7 CONCLUSION

- 7.1 The proposed development has been informed by the step-wise approach. The PEA submitted in support of this application identifies the habitats found on the site and potential implications for habitats located within close proximity. Furthermore, the Site has been assessed for its ability to support wildlife and mitigations and enhancements recommended accordingly.
- 7.2 The proposal provides a series of enhancements outlined in this statement which retain and protect the valued resources identified within the site resulting in a scheme which delivers net benefits to biodiversity in accordance with Chapter 6 of PPW.
- 7.3 The protections and enhancements for the identified ecological value on the site can be appropriately secured by condition through the provision of a Construction and Environmental Management Plan, Ecological Mitigation and Enhancement Plan, landscaping details and a low impact lighting strategy.