Llantrisant Health Park

Green Infrastructure Statement - PAC Draft

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1. Introduction and Background

This Green Infrastructure (GI) Statement is prepared by The Urbanists Ltd, on behalf of Cwm Taf Morgannwg University Health Board. It addresses the GI considerations related to the redevelopment of the former British Airways Avionics Engineering facility, Ely Meadow, Talbot Green, Llantrisant, CF72 8XL. The proposed development is the Llantrisant Health Park, comprising a Diagnostic Centre, Surgical Hubs, Endoscopy Suite, and Academy, as well as associated infrastructure and services.

The site measures approximately 8.36ha and comprises three connected buildings surrounded by parking, vehicle circulation/access routes, and soft landscape areas. The existing buildings are almost identical to each other architecturally. At the edges of the site are woodland to the north, south and west, and to the east is a wooded tree corridor (alongside a watercourse) or road. Within the southern part of the site is an area of semi-improved grassland, and there are also other adjacent and scattered areas of amenity grassland.

The purpose of a GI Statement ('the Statement') is to demonstrate how GI has been considered in the project to provide a positive multi-functional outcome, and to demonstrate how the Step-wise approach has been applied to ecological considerations.

Planning Policy Wales Edition 12 provides the key legislative and national planning policy context for GI Statements. The Local Development Plan (LDP) and Supplementary Planning Guidance (SPG) for Rhondda Cynon Taf County Borough Council provide the policies regarding biodiversity. There is also further associated guidance in the Rhondda Cynon Taf Action for Nature Plan, and although this is not strictly a planning policy consideration, it does provide some further guidance on best practice.

The key outcomes of the GI considerations are reviewed with regard to the ecosystem concepts of: biodiversity value; ecosystem resilience; and ecosystem services. Together these enable the scheme to evidence best practice, and provide comparable considerations to other frameworks, including the Building with Nature Standards.

The Statement is informed by the documents and plans which accompany this planning application, and which are specified throughout (where relevant).

2. Policy and Legislative Context

This section sets out the key legislative, planning policy and guidance which inform the requirements of, and the approach to, Green Infrastructure Statements.

2.1. Legislation

2.1.1. Environment (Wales) Act 2016

The Act introduced an enhanced duty for public authorities in the exercise of their functions relating to the biodiversity and resilience of ecosystems (referred to as the section 6 duty).

Section 6 sets out the biodiversity and resilience of ecosystems duty of all public authorities in Wales. This requires public authorities to promote resilience of ecosystems. through seeking to maintain and enhance biodiversity in exercising their functions, while encouraging others to do the same.Section 7 (Part 1) identifies species and habitats of 'principal importance' for the purpose of maintaining and enhancing biodiversity.

2.2. National and Local Policy

2.2.1. Planning Policy Wales, Edition 12

Planning Policy Wales (PPW) is the principal planning policy document of the Welsh Government and informs all planning decisions and appeals. The current version of which is PPW Edition 12.

Chapter 6 of PPW 12 explains that a GI Statement should be submitted with all planning applications, and also explains the general standards that any statement should seek to meet. It explains that GI comprises the:

"*network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places…*"

"…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" (par.6.2.1).

It further advises that:

"*proposals should be informed by the priorities identified in green infrastructure assessments and locally based planning guidance*" (par.6.2.5).

It also sets out how proposed development should be assessed within, or potentially impacting upon, designated sites, including non-statutory designated sites. It introduces the 'Step-wise approach' which is expected to be applied to such consideration and therefore should be evidenced in any GI statement. This approach regards the resilience of ecosystems (ER) and therefore their ability to continue to deliver value from GI, when under pressure or differing demand.

It explains that, in terms of protection for non-statutory designated sites, which includes Site of Nature Conservation Interest (SINCs), development can be appropriate where adherence to the Step-wise approach is demonstrated (including a net benefit for biodiversity) and there is no reduction in overall conservation value of the designated area or feature.

The PPW Chapter 6 update also covers trees, woodland, and hedgerows, and sets out the expectations to retain and protect such assets, where they are capable of making a significant contribution to an area. Where loss occurs, replacement will be required in line with the standards and ratios set out, and any permanent removal is only appropriate where there would be significant and clearly defined public benefit. Compensatory planting is required to be proportionate to the proposed loss as identified through an assessment of green infrastructure value by way of three specific aspects of biodiversity, landscape (amenity) and carbon capture values.

2.2.2. Future Wales: The National Plan 2040

Future Wales (FW) - The National Plan 2040 was adopted in February 2021 as the national development framework (NDF) setting the direction of development in Wales to 2040. The NDF provides a strategy to address key national priorities through the planning system, including developing a vibrant economy, developing strong ecosystems, achieving decarbonisation and climate resilience and improving the health and wellbeing of communities.

Policy 9 of FW focuses on 'Resilient Ecological Networks and Green Infrastructure', and sets out that planning authorities should identify areas of importance and opportunities for Green Infrastructure safeguarding and enhancement.

Given that FW strategy and national priorities can be in part addressed through Green Infrastructure, any GI Statement would be expected to align with those and support the delivery of it, where possible.

2.2.3. Technical Advice Note 5 - Nature Conservation and Planning (1996)

TAN5 provides national guidance on how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. The guidance indicates that biodiversity conservation and enhancement is an integral part of planning for sustainable development. The guidance advocates a collaborative approach where LPAs, developers and key stakeholders in conservation should work together to deliver sustainable development.

2.2.4. Rhondda Cynon Taf Local Development Plan - Adopted March 2011

Local Development Plan policies and Supplementary Planning Guidance (SPGs) considered as potentially relevant to the proposed development are as follows:

Local Development Plan Policies:

- CS10: Minerals:

Favours proposals that promote the sustainable use of minerals. The safeguarding of known resources, including unnecessarily sterilising them or hindering their future extraction.

- AW2: Sustainable Locations:

Development proposals will only be supported in sustainable locations. These sites can be identified as having good access to key services and facilities, support the roles of key settlements and are well connected to existing infrastructure and deliver improvements to services where necessary.

- AW7: Protection and Enhancement of the Built Environment:

Development proposals which impact upon sites of architectural/ historical merit will only be permitted where it can be demonstrated that the proposal would enhance or preserve the character and appearance of the site.

- AW8 Protection and Enhancement of the Natural Environment:

This policy directs the council to protect, conserve, enhance and manage natural heritage, in consideration of all development proposals.

- AW10 Environmental Protection and Public Health:

Development impacting health or local amenity because of pollution, contamination or risks to the environment will need to demonstrate measures can be taken to overcome significant adverse impacts.

- AW14 Safeguarding of Minerals:

Minerals shall be safeguarded from any development which would adversely affect their extraction.

- NSA16: Redevelopment of Vacant/ Redundant Industrial Sites:

Proposals for the conversion or re-development of redundant and/ or vacant industrial sites will be supported where the development is compatible with other uses in the locality and there are no significant adverse impacts on the nearby amenities.

Supplementary Planning Guidance

Nature Conservation (March 2011)

The SPG sets out how development proposals should conserve or enhance ecology and biodiversity, linking it to TAN5 and LDP Policy AW8. The approach advocated through this guidance is now also covered by the national requirements for the consideration of development to follow the step-wise approach, for Green Infrastructure Statements, requirement for net benefit for biodiversity, building ecosystem resilience, and Sustainable Drainage Systems.

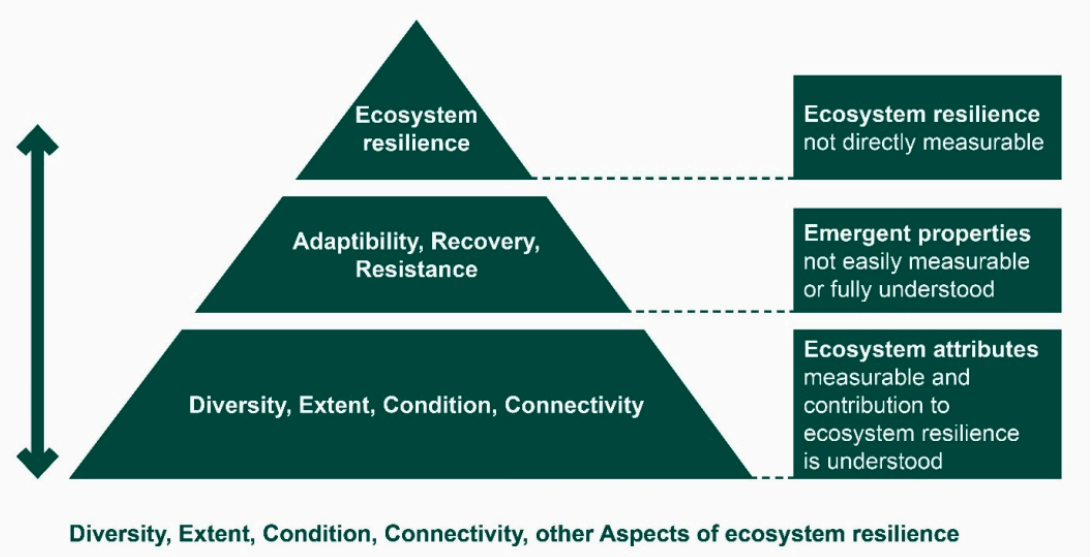
2.3. Frameworks, Approaches, and Best Practice Guidance

2.3.1. DECCA Framework and Ecosystem Resilience

This DECCA framework (see Figure 3 below) sets out 5 key considerations of habitats and species which lead to Ecosystem Resilience (ER). The first four are the attributes of Diversity, Extent, Condition and Connectivity of species (genetics and populations) and/or habitats. There is also the fifth combined aspect of Adaptability, recovery and resistance, which is an

emergent combined property resulting from the other four attributes (see Figure 1 below), and which together (DECC & A) decide the level of ER.

Figure 1: Extract from Natural Resource Wales - Ecosystem Resilience in a Nutshell 1: What is ecosystem resilience? [1]



ER is not itself directly measurable because of the extremely large number of influencing factors. The DECCA framework is a useful 'proxy method', providing a feasible and viable assessment of ER, using just a few measurable attributes, to enable the approximate consideration of ER more easily; so it may be used in practice.

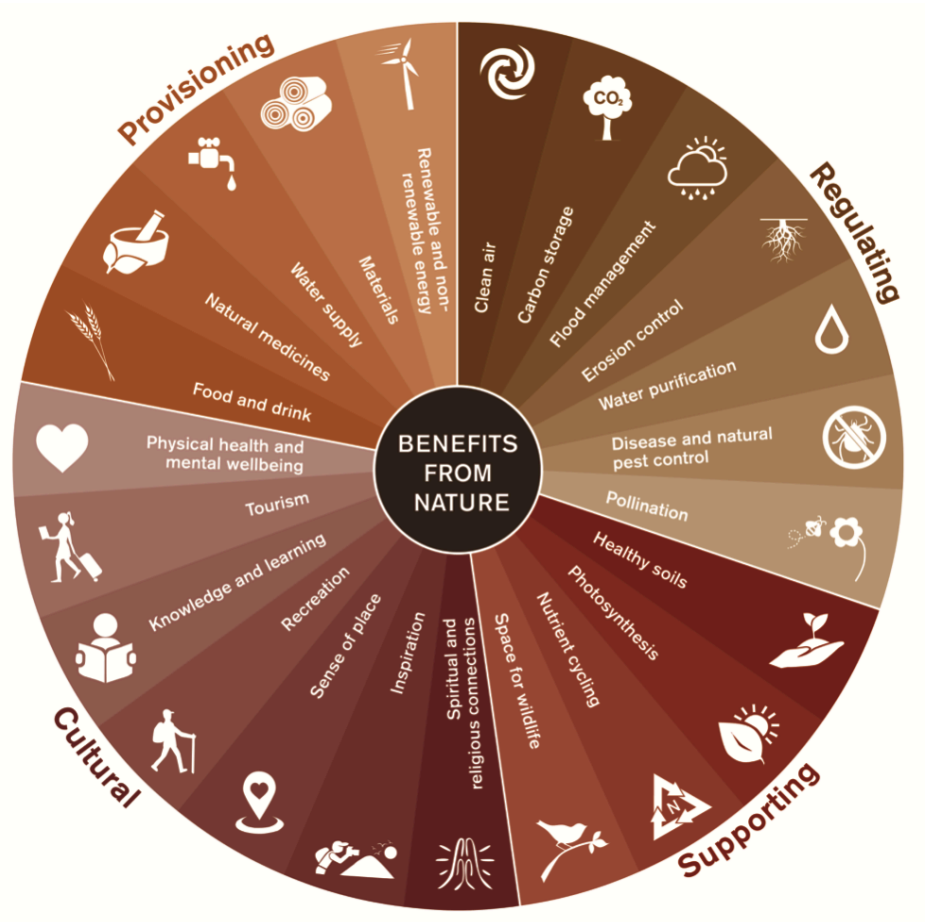
2.3.2. Ecosystem Services Framework

Ecosystem Services (ES) is a framework which can be utilised as an effective means by which to understand the flow of benefits from Green Infrastructure to humans, and therefore more directly consider what is valuable to people and communities. They add a human layer to the understanding of the multi-functionality of GI, which allows a greater consideration of how this can be maximised and for who.

[1]https://cdn.cyfoethnaturiol.cymru/media/696279/ecosystem-resilience-in-a-nutshell-1-what-is-ecosystem-resilience.pdf

We experience ES as Cultural, Regulating, Provisioning, and Supporting services; as a common, and widely accepted, standard of division (see Figure 4 below). Cultural services are non-material benefits to society that help deliver cultural advancement. Regulating services are those that help moderate natural phenomena to the benefit of people. Provisioning services are those that deliver a material benefit to people, via the extraction of resources. Finally, Supporting services are those that ensure the continued production and maintenance of those other services; these can be thought of as those services which deliver ES.

Figure 2: Ecosystem Services (source: Nature Scot)



2.3.3. Biodiversity, Ecosystems, Ecosystem Resilience, and Ecosystem Services

As the Natural Resource Wales 'State of Natural Resources Report (SoNRR)'[2] sets out, ER is important for the sustainability of ES. Both concepts are inherently linked to the structure of

[2] https://naturalresources.wales/media/679405/chapter-4-resilience-final-for-publication.pdf

an ecosystem (its 'Processes' and resultant 'Functions'). ER being an important emergent property of an ecosystem's physical and biological structure, and ES being a resultant beneficial outcome for people.

Ecosystems are fundamentally formed of biotic (animals and plants, etc.) and abiotic components (soil, rock, rivers, climate, etc.). Both of these influence the processes and functions of ecosystems, and these in turn influence resultant ER and realised ES benefits. The biotic-diversity (biodiversity) of a single or multiple habitat in an ecosystem, is largely more fragile (less resilient) and therefore at risk of development impacts than the abiotic components; although abiotic components are also important, and can also be at risk.

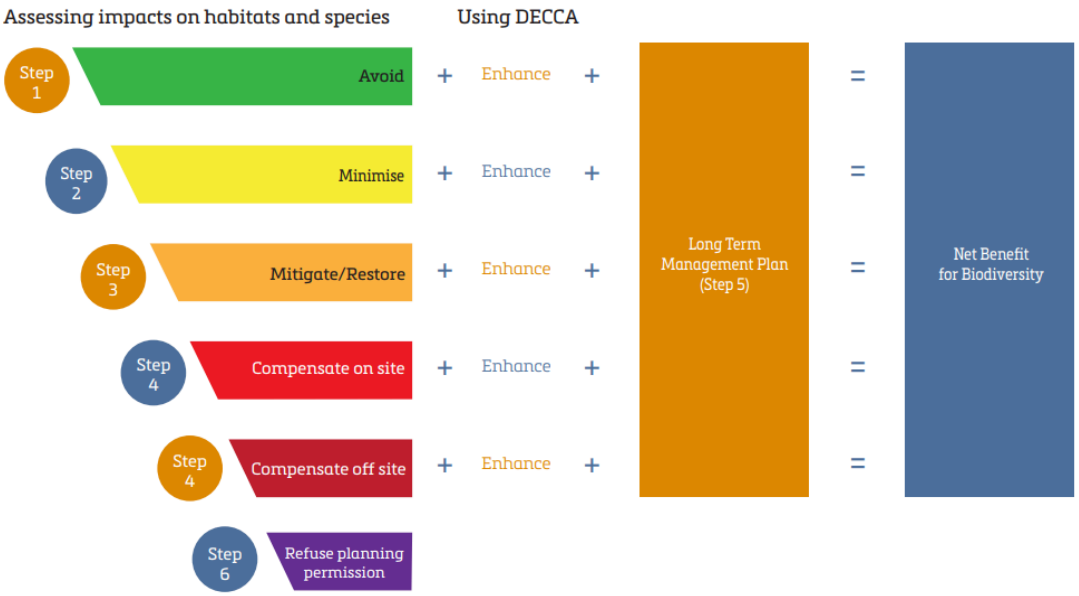
Under the Environment (Wales) Act, public bodies should seek to maintain and enhance biodiversity and the resilience of ecosystems. Multifunctional GI is set out as a means to maximise benefits from those aims, and therefore ES is additionally important. Within the Planning Policy Wales Ed. 12 Chapter 6 content, the specifics of a GI approach are further prescribed, and the components of a nature-based approach are established. Together these aims, considerations of frameworks, and requirements of policy contribute to a need to deliver good-quality design that incorporates GI.

2.3.4. Step-wise approach

PPW Ed. 12 Chapter 6 requires the Step-wise approach to be demonstrated within proposed development designs. This approach sets out the procedure of initially following the 'Mitigation hierarchy' stages, to sequentially (as required): avoid, minimise, or mitigate/restore impact to habitats and species, or compensate on-site and as a last resort compensate off-site. At each of these stages, a proportional enhancement must be proposed that demonstrates the DECC[A] attributes. A long-term management strategy is additionally required, that would ensure those measures proposed are deliverable; and would actually result in the level of Net Benefit for Biodiversity (NBB) and ER attributes that are described; as well as any resultant ES benefits gained.

Should the mitigation hierarchy not be possible to follow (i.e. no stages of the hierarchy are possible) then planning permission should be refused. Should suitable enhancements relative to each stage of the hierarchy, and/or no suitable long-term management plan be possible, then a NBB is consequently unlikely to be possible and planning permission is, again, likely to be refused.

Figure 3: Step-Wise Approach - Extract from PPW Chapter 6.



2.3.5. Building with Nature (BwN) Standards

The Building with Nature Standards are focused on guiding and assessing multifunctional benefits of GI, such that maximum value is gained. An ES framework of assessment can serve to assist in considering the attainment of the frameworks 'Values'.

BwN are a set of privately developed standards, for which the general principles are freely available, but accreditation for development comes with a fee. PPW Chapter 6 sets out that these principles should be regarded, especially if no Green Infrastructure Assessment has been undertaken for an authority area.

Should there be no up-to-date GI Assessment for the local authority area, the assessment of proposed development against these standards can also serve to evidence compliance with the more general requirements of PPW Chapter 6.

These BwN standards set out several main criteria, and sub-criteria, by which to assess green infrastructure, including:

- CORE Standards
    - Standard 1 Optimises Multifunctionality 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

Importantly the core standards set a foundation for high-quality GI which are supported by the other standards. There is no weighting of any one criteria, and principles within each need to be demonstrated to evidence high-quality GI.

These standards are complementary to the step-wise approach, DECCA framework, and any management strategy required, which focuses on ER and other aspects of habitats and species (e.g. arboricultural values). Indeed, the Wildlife standard can be considered with regard to the Step-wise approach. In their vast majority, these standards can be considered as an illustration of ES enhancement, and a means of guidance for maximising the ES

benefit when designing schemes. The ES framework integrates with these standards, and this statement will utilise a consideration of ES values to do so.

3. Site Baseline

This section provides a summary of the existing conditions of the proposed development site and wider relevant context, based on survey efforts and desk study. This regards habitats and species, Ecological and GI features, and their varying values and spatial scales (site importance up to larger areas importance). It also considers other information available, and summarises their influence on the design and overall consideration in later sections of this statement.

3.1. Ecological Baseline Summary

The existing ecological value of the site area has been considered within a Preliminary Ecological Appraisal produced by Acer Ecology in May 2024. This is also informed by a variety of surveys carried out across the site and a Technical Summary which was issued February 2025, including:

- Dormouse (January 2025) - not considered to be likely to be present;
- Bats and nesting birds in trees (November 2024) - Active nests of Barn Swallows and Swifts were recorded within the buildings' external stairwells in 2024, and defunct nests found in roof spaces. The site's habitats are considered to be of high ecological value for birds, with regard to their suitability for nesting and accessibility to nearby woodland and other suitable habitats nearby;
- Bat emergence surveys found no evidence of bats roosting within or on the building, and activity appeared to be confined to the wooded site boundaries;
- Reptiles (November 2024) - Some presence of slow worms (a low population) was found within the site, as well as common lizards (a good population). Both were present in habitats already suitable for reptiles, in the southern grassland areas.

3.2. Arboricultural GI Baseline Summary

The site's large areas of boundary and on-site wooded areas means that the potential value of the site with regard to arboriculture is relatively high. Part of the woodland along the

western boundary is Ancient semi-natural woodland and as such both the ecological and potential arboricultural value of these areas is likely to be greater.

Within the site the presence of amenity planting means that many of the trees present are ornamental, although there are also native species (e.g. Ash). Of those trees within the site many are of Category B and C quality, and should be retained. Many are of Category U value and are likely to need to be removed for reasons of safety.

3.3. Ecosystem Services Baseline Summary

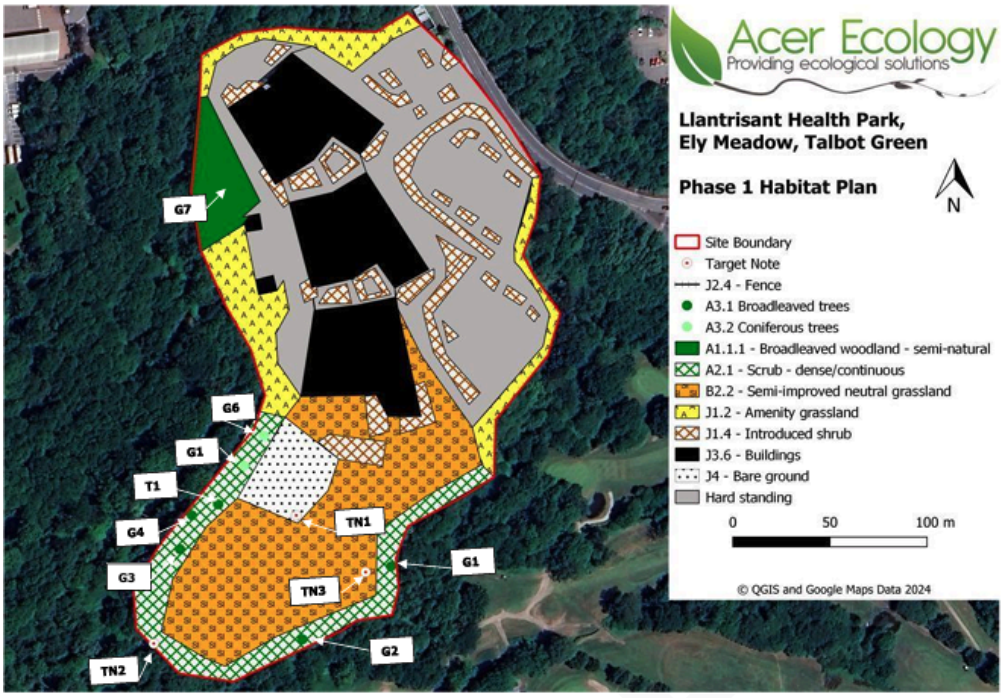
The presence of large areas of buildings and hardstanding existing in the site means that the provision of ecosystem services is largely limited to the contributions from amenity areas (some minor regulating, supporting and cultural values), with greater contributions of the more natural southern areas of the site, and bounding site edges / further. In those southern and boundary areas, as well as beyond, a locally and site significant contribution to the following are likely:

- Supporting services - supporting healthy soils, nutrient cycling, and sustaining space for wildlife.
- Regulating services - contributing to clean air, flood management, erosion control, and carbon sequestration.
- Cultural - Providing a largely green backdrop to the built areas of site to the benefit of users wellbeing, and creating a sense of place that is coherent with the wider valley.

3.4. Landscape Baseline Summary

The site and wider landscape were assessed and characterised. There is a small area of broadleaved woodland near the north-western boundary of the site and the rest along the eastern, southern and western boundary. Dominant tree species include willow, with frequent silver birch and occasional beech. There is a large area of dense scrub that wraps around the southern and south-westernmost extent of the proposed development site. There is also a patch of scattered scrub, along the edge of the bare ground towards the south of the site as well as a large area of semi-improved grassland.

Figure 4: Extract of Habitats and Vegetation Plan



4. Proposed Scheme of Development

The proposed scheme includes the demolition of existing site buildings and some associated built and amenity areas plus the redevelopment of these alongside the reuse of existing built areas. In summary it is proposed to comprise: day surgery and orthopaedic theatres, endoscopy, wards (54 beds), MRI, CT and ultrasound facilities. The proposed scheme is predominantly 2 storeys in height (plus plant/M&E) plus a 3 storey element for the Endoscopy Academy (northern block). The proposed layout has regard to the overall footprint of the existing buildings, with a gross internal floor space of some 17,000 sqm.

4.1. Step-Wise Approach summary

The following is a summary, in relation to the proposed habitats post-development and the opportunities the proposed development presents for species:

a) the proposed scheme's mitigation - avoidance, minimisation, mitigation or replacement, and compensation off or on site;

b) enhancement - by way of Diversity, Extent, Condition, or Connectivity, and resultant Attributes of adaptability, resilience, and/or resistance to pressures;

c) proposed long-term management principles to secure the above benefits; and

d) multifunctionality of the above, with regard to the Ecosystems Services the proposal is considered to deliver.

This is followed by sections providing greater detail and analysis to support this summary. Those following sections are based on the specialist areas of consideration, to enable a comparison against the baseline conditions and the Step-wise approach be illustrated in more detail.

4.1.1. Mitigation Hierarchy Summary

Avoidance	The loss of any habitats of value within the site, other than the buildings themselves, is largely avoided or minimised. Proposed development instead would utilise existing developed or amenity areas. It would also respect adjacent important habitats, and avoid impacts to adjacent areas, off-site.
Minimisation	Where possible the loss of trees has been minimised, as has the losses of existing opportunities for species and in particular reptiles present in the southern section of the site. The proposal for the site will include lighting strategies and design which are sensitive to ecological requirements. A dark corridor will be maintained along the woodland and scrub habitats within the site boundary.
Mitigation	In reptile sensitive areas of the site such as the lower plateau, mitigation measures will be implemented to protect reptile populations. This will be by installation of exclusion fencing and, later, translocation of any reptiles found, prior to works commencing to ensure the risk of harm is minimised.
Compensation on / off site	The loss of some trees and amenity areas is more than compensated for by new planting of a number of trees (a 3:1 ratio as/ where required), and the new replacement amenity or more naturalistic habitat to replace those lost will more than compensate for the impact of the proposals.

	To compensate for the loss of 22 swallow nesting sites, dedicated swallow shelters have been installed within the development site in suitable locations. Designed to replicate natural nesting conditions, this measure aims to support local swallow populations and mitigates the impact of the loss of nesting sites due to demolition. This feature will be retained permanently following development on the LHP site. Early engagement with the Ecology Consultant and Local Authority has ensured that bat boxes and solitary bee boxes etc have been incorporated within the future LHP proposal. Locations of these will be agreed during RIBA stage 4 detailed design, but a provision is to be made for these within RIBA stage 3.

4.1.2. DECCA Enhancements Summary

Diversity	The diversity of fauna within the site would be maintained by the proposed mitigation, including replacement of suitable nesting and roosting opportunities where necessary. It should be further enhanced by the proposed landscape management strategy, helping to create and sustain greater opportunities for a range of associated species such as invertebrates by better grassland management. The diversity of floral species within the site would be enhanced by the proposed new amenity planting, and likely also by the better management of southern retained grassland areas. Overall the scheme should produce a greater diversity between species (the number of species present) and within them (genetic diversity by supporting more healthy population numbers).
Extent	The extent of habitats present will largely be maintained and/or enhanced by the proposal. In addition to this there is also the opportunity to incorporate green roofs which would increase the 'land cover' so a greater proportion is of benefit to wildlife.
Condition	New habitats have been chosen for varying wildlife benefits, but also the specific improvement of conditions for protected species known from the site. Key receptor bat and reptile species, and others potentially present would benefit from the improvement in the condition of suitable habitats and opportunities (foraging, roosting / resting, commuting / dispersing through the site.

	The overall condition for most retained / enhanced habitats would be improved across the site by improved management. The condition of adjacent woodland areas would only be maintained, but by the improvement of adjacent grassland a small improvement in their condition by association may be produced.
Connectivity	The connectivity of habitats across the site would likewise be largely maintained by the proposal, including by the new location of suitable roost and nesting features. There is the opportunity for new amenity planting areas to become improved in their diversity and therefore act as better 'islands' for wildlife, and therefore support periodic movement by creating 'stepping-stones' for some species. Swales and raingarden SuDS are integrated with the landscape design, and will enhance connectivity through to the wetland basin in the southern part of the site with additional wellbeing walking routes around the wetland area.

4.1.3. Long-term Management Summary Opportunities

Grass Seeding	To allow flowering and the setting of seed - No mowing or other sward management between April and the end of flowering (approximately early-late August), except hand-pull of any over dominant 'weed' or sown species. To ensure no 'weed' species become established, and no grasses become dominant - In other Autumn and Winter months, mowing the sward to a height of approximately 30mm, as required. Any woody species present should be cut and spot-treated with a systemic herbicide (Glyphosate, or similar) only. To ensure that the species present can set their seed for the next year - The arisings of the first cut post-flowering should ideally be left in place for several days, before removal. To ensure that soil conditions remain suitable - All arisings should be raked-off, and removed from the area of cutting, to ensure low fertility soil remains. These arisings could be piled within woodland understorey areas, as habitats piles suitable for sheltering reptiles.

Wetland Planting	Management as necessary to ensure a good diversity and condition, including the maintenance of habitat features to provide other drainage functions. This management supersedes other competing needs. Priority to keep compost moist but not waterlogged, ensuring adequate light and warmth with regular checks for signs of stress like yellowing leaves and adjust water accordingly.
Native and Ornamental, Species Rich Shrubs	Annual pruning of shrubby specimens or scrubby areas, as necessary. Annual removal of dead vegetation as necessary, and selective removal or other management (e.g. aggressive pruning, selective use of systemic herbicide) of any species which become overdominant or spreading.
Existing and New Native Hedgerow Planting	With regard to the new or existing planting, to secure the establishment and health of new species for the first 5 years. Thereafter, the pruning of the hedgerow as required, outside bird nesting season. Ideally, the periodic laying of hedgerow, or otherwise dead-hedging any removed material, to create a variable structure.
New Trees	The care and pruning of trees as required, with the replacement of specimens that fail to become established, or which already exist and are prominent or important to ecology in the site and die. To ensure no disturbance or harm to nesting birds - all works are to take place outside the bird nesting season, or under suitable ecological supervision and where it is established no active nests are present. To ensure no disturbance or harm to bats - all works to take place only on limbs or trees without suitable features for roosting bats. Where these are present or potentially present, suitable ecological advice should be sought before any works.
Bat Boxes and Bee Bricks	For bat boxes - the maintenance of these or replacement with a similar alternative as necessary.

	Bee Bricks - The cleaning of bee bricks, may take place where necessary in order to optimise bee habitation.

4.1.4. Ecosystem Services Summary

Cultural	Landscaped areas that have the potential to be used as accessible natural greenspace by site users, as well as the incorporation of features of wildlife benefit bring people closer to nature. There are extensive areas where such multi-functional spaces are present within the site, and other areas where naturalistic or wildlife-friendly planting is adjacent to accessible areas such as the southern wetland walkway.
Regulating	Swales and raingarden SuDS integrated with the landscape design connecting to the large wetland basin contribute to the SuDS provision, Trees and other vegetation around the site would also contribute to both the management of rainfall in general (interception slowing, and filtration), and provide evapotranspiration cooling effects where present. Trees would provide shade, and further cool urban areas, especially where that shade would fall on hardstanding or buildings. The above would all contribute to climate change resilience of the site, and development. New tree planting, and other vegetation, would sequester and store carbon in both their masses and/or in soils. Given the areas where good condition habitats, with permanent ground covering species, are to become established then a significant increase in regulating services associated with soil, water, and carbon retention / storage regulation would be likely.

Supporting	The significant areas of new ground flora, and other vegetation, would assist in the formation of improved top soils on existing or newly uncovered / made ground and help secure improved nutrient cycling within the site. All landscaping and proposed features for wildlife would provide a habitat benefit for fauna over the existing baseline condition of the site. The diversity of differing habitats, types of planting, and their conditions, would all help ensure there are significant opportunities for the supporting of fauna that may require quite specific single or multiple close-by. By sustaining and enhancing hedgerow and tree features within the site, a supporting provision for opportunities for potential bats would be provided; helping sustain a protected species.
Provisioning	The presence of large areas of building and hardstanding existing in the site means that the provision of ecosystem services is largely limited to the contributions from amenity areas with greater contributions by the more natural southern areas of the site.

4.2. Ecology Summary and Analysis

The proposed scheme has had a high consideration for the existing assets of potential biodiversity and ecological resilience significance within the site, retaining them where possible. The scheme proposes planting and features of benefit to wildlife, of a type and scale to enhance the overall biodiversity of the site. Those enhancements also target opportunities to improve ecosystem resilience. Throughout the design process, the Step-wise approach to ecology has been followed and ensured. This has been informed and guided by the ecological reporting accompanying the planning application.

The proposed landscaping and other features would introduce a range of higher-quality habitats by their composition and placement, than are existing. There would be an improved number of differing habitat types, and therefore diversity between them, within the site; increased diversity of species within each habitat type; and, consequential enhancement of

opportunities for a larger range of fauna, and the quality for those already potentially present within the site.

The positioning of the landscape elements has had a high regard for maximising biodiversity, with trees, native planting, plus wildflower and grassland areas. New open space and green links seamlessly integrate and enhance the surrounding existing landscape features such as the woodland, scattered trees, and ecological habitats.

The Management consideration of the step-wise approach is considered in brief, above. There is a significant contribution from the proposed scheme's new GI, producing a good level of Net Benefit for Biodiversity and Ecological Resilience enhancement. The management is considered material to those site uplifts, with regard to maintaining the benefits set out.

4.3. Aboricultural Summary

Many of the trees on site are to be retained, with the exception of some Category U trees for reasons of safety. Seventeen trees have been classified as U category and need to be felled, for reasons of safety and not because of the development proposed.

Compensation for the loss of trees associated with development would comprise replacement tree planting across the site, at more than 3 trees for each 1 to be removed because of development. Identified root protection areas for retained trees will be secured and made safe from development throughout any construction. Structures in Root Protection Zones will be avoided, and any unlikely construction impacts be made acceptably minimal and under the advice of a suitably qualified arboriculturist.

4.4. SuDS Summary

As part of the proposal a scheme of SuDS is proposed for which will provide interception, water quality, flow reduction, amenity and biodiversity benefits in line with the applicable standards. It is proposed that new sustainable drainage system principles aim to mimic the natural catchment process as closely as possible. Surface water flows from the proposed new development would need to be attenuated via a flow control chamber, given the proposed site usage, storage in the form of a wetland basin is achievable for the site. Therefore, swales and rain garden SuDS integrated with the landscape design, connects through to the large wetland basin in the southern portion of the site. Run off rates will be

restricted and discharged via gravity to the existing outfall to the River Ely. This allows the site to function largely as it has done historically.

4.5. Landscape Summary

The proposed landscape scheme has been designed to enhance the existing biodiversity of the site, providing a welcoming and verdant health park environment. Biodiversity is maximised with tree-lined avenues and native planting, wildflower mix and grassland areas. The south of the site is designed to incorporate a wellbeing walk with pocket amenity spaces, the walk passes wildflower meadows, groups of trees and a mosaic of biodiverse habitats, linking with the wetland walk beyond. A wetland SuDS providing attenuation volumes, water cleaning, riparian and aquatic biodiverse habitats, waterside amenity seating spaces and views of the adjacent woodlands and rivers beyond the site. is incorporated into the scheme making use of the conditions of the site in the south.

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Figure 5: Extract of Drainage Strategy

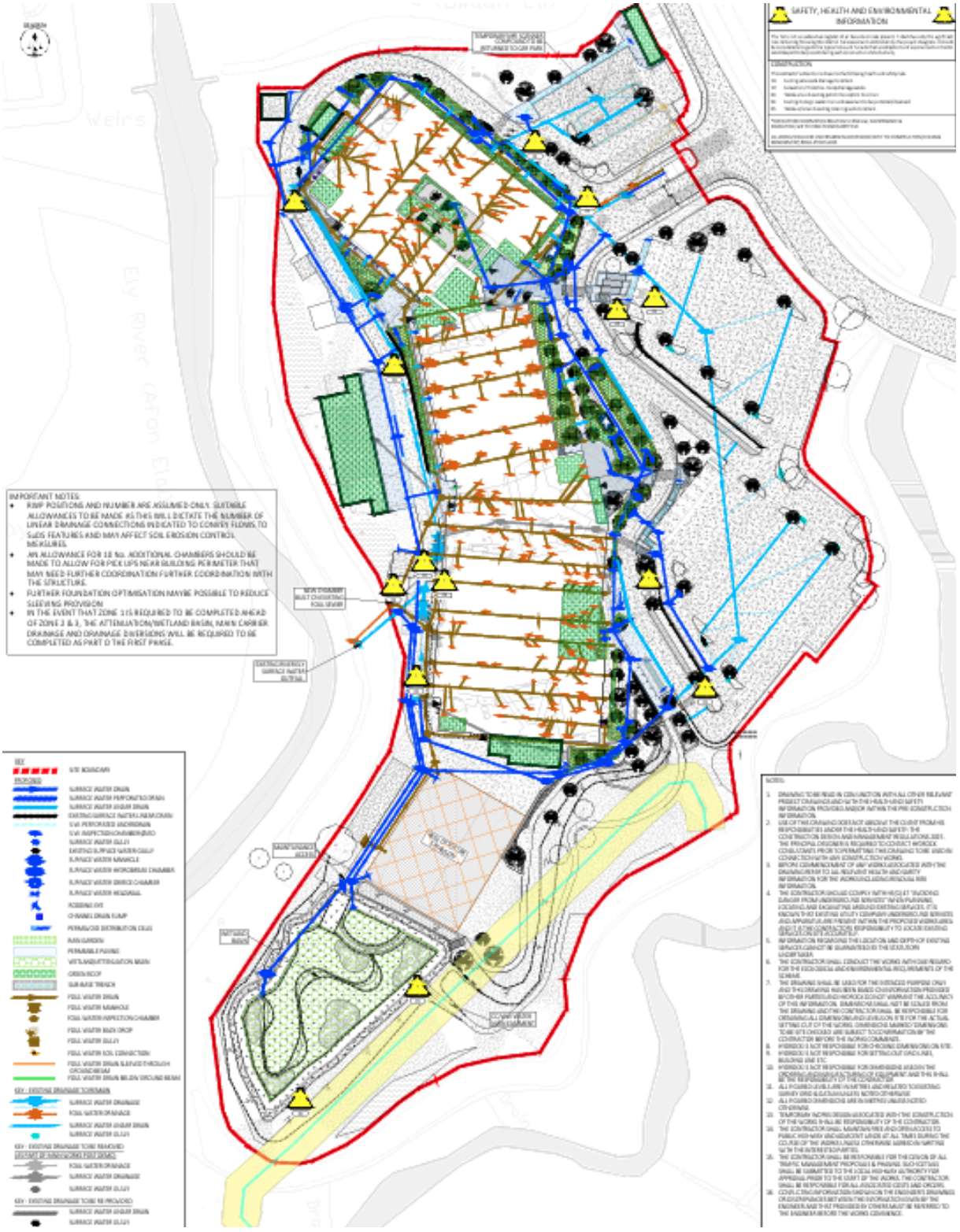
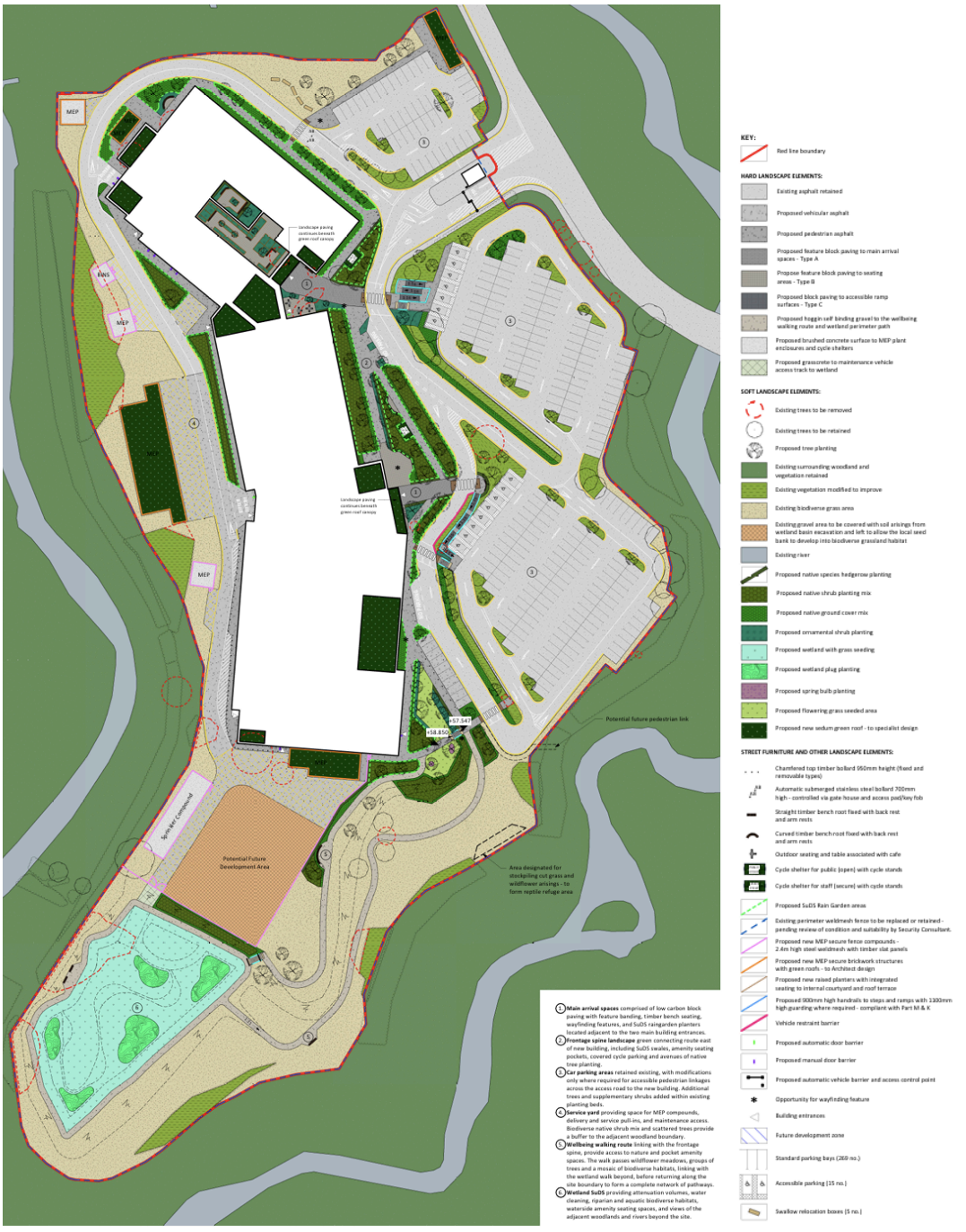


Figure 6: Extract of Landscape Masterplan



4.6 Building with Nature Standards

The proposed scheme, as already set out in regard the step-wise approach and wider ES values, is reviewed below with regard to the Building with Nature Standards, and how the scheme meets these standards, to more clearly demonstrate the multifunctional GI benefits from the proposal.

Building with Nature Standards Review

Standard	Assessment	Outcome
Core Standards		
Standard 1 Optimises Multifunctionality and Connectivity	Multifunctionality has been extensively considered in this scheme. This has included an integration of naturalistic and human elements where possible. The benefits to site and local area connectivity for nature are significant, while the connectivity benefits for people have also been enhanced through the provision of amenity space and walking routes through diverse biodiversity habitats.	A well-connected landscape for people and protected species through the provision of tree lined avenues, native planting and grassland areas. The enhancement of landscape features as well as the incorporation of rain gardens and wetland planting creates a connected space that also serves as a Sustainable Drainage features.
Standard 2 Positively Responds to the Climate Emergency	The proposed GI enhances the baseline condition through new hedgerow and wider habitat creation, with species renowned for their high carbon capture properties in addition to other benefits in relation to surface water runoff, connectivity and noise reduction.	A diverse and varied landscape proposal with aspirations for longevity.
Standard 3 Maximises Environmental Net Gains	The loss of the swallow nest sites will be offset by the provision of dedicated swallow nest provisions which are to be retained as a permanent feature of the site.. The diverse	New planting such as wildflower meadow, hedgerows and trees will offset the habitat removal necessitated by the development. The

Standard	Assessment	Outcome
	and varied landscape proposal has been influenced by existing features of value to maximise environmental benefits.	proposed scheme incorporates rain gardens, and wetland SuDS to assist with water runoff capture and pollution prevention.
Standard 4 Champions a Context Driven Approach	The existing tree canopy gives significant amenity and visual context to the site, while the adjacent habitats further frame the site as a pinnacle of wider area GI.	The proposed development has sensitively responded to the constraints and opportunities for tree value within the site, from both an ER and ES perspective.
Standard 5 Creates Distinctive Places	The consideration of GI enhancement has been central to the design process. The overall approach of hard and soft landscape, combined with scale, massing, built form, materials and boundary treatment contributes to create a unique and attractive, yet functional place.	It has retained the visual openness of the green space, and the dominance of the trees upon the public realm surrounding the site. It increases and enhances landscape connectivity with enhanced water management.
Standard 6 Secures Effective Place-keeping	The scheme landscape design aims to minimise the need for intervention in terms of management and maintenance.	The landscape management will be subject to a minimal management strategy allowing native species to flourish.
Wellbeing Standards		
Standard 7 Brings Nature Closer to People	The proposed landscape scheme includes a wellbeing walking route linking with the frontage spine, providing access to nature and pocket amenity spaces for staff. The	The proposals seek to improve this experience and in addition bring broader habitat creation closer to the boundaries.

Standard	Assessment	Outcome
	route passes wildflower meadows, trees and a mosaic of biodiverse habitats and views of the adjacent woodland connecting people to the surrounding landscape.	
Standard 8 Supports Equitable and Inclusive Places	The existing use of the site does not meet current standards for inclusive design and the brief for this project has allowed the provision of inclusivity within the external landscape.	Footpaths and circulation to the new central walking route feature allow for inclusivity.
Water Standards		
Standard 9 Delivers Climate Resilient Water Management	The current site arrangement is that surface water is discharged to surface drains, which once entering the drainage system are discharged to the River Ely without treatment or attenuation. The proposed development will increase infiltration and pollution interception through the implementation of swales and rain garden areas and wetland attenuation.	The creation and inclusion of planted rain gardens and wetland allow for improved water quality management and ecological resilience.
Standard 10 Brings Water Closer to People	The rain gardens will be viewable at areas within the site, as well as the wetland to the south of the site with timber benches provided for visitors of the site to enjoy the	The creation and inclusion of planted rain gardens allow for new incorporation of visible ephemeral water features into the site.

Standard	Assessment	Outcome
	new aquatic biodiverse habitat and views .	
Wildlife Standards		
Standard 11 Delivers Wildlife Enhancement	The BREEAM assessment completed for the scheme demonstrates an increase in biodiversity units as a result of the proposals and targets BREEAM 'Excellent'. The scheme has followed the mitigation hierarchy approach to habitat and species protection and creation. Protected and/or notable species will be protected during the works via implementation of method statements and where impacts are unavoidable, both compensation and enhancement measures in line with legislative and policy requirements will be delivered. Compensation for priority species habitat has already been provided during the demolition stage, and is due to be a permanent feature of the development further enhancing ecological value.	A number of habitat and species based enhancements have been included within the proposals. All habitats and mitigation measures will be maintained
Standard 12 Underpins Nature's Recovery	The existing woodland will be retained and protected during the construction and operational phases of the development. There will be enhanced mixed native species hedgerow, wildflower and grassland areas incorporated providing increased biodiversity benefit.	These habitats will facilitate effective links and connection from the site to the wider environment, allowing movement of wildlife through the site, including the non-statutory designation beyond the boundary of the site. New hedgerow and tree planting will enhance the

Standard	Assessment	Outcome
		connectivity across the site, and enhance the resilience of existing hedgerow off-site adjacent, New wildflower and grassland areas will provide enhanced foraging and commuting habitat for many notable and/or protected species.

Given the proposed development's alignment with national and local policy with regard to GI, the proposed development also accords with the UN Global Biodiversity Framework (2022). It meets key target areas: especially relating to reducing threats to biodiversity; but also sustains use and benefits sharing (to meet people's needs), especially in an urban context; and utilises tools and solutions for implementation and mainstreaming an ecocentric approach to the proposed development.

5. Assessment

The scheme aims to provide a considered and significant enhancement, in line with the step-wise approach. The mitigation hierarchy which is to be considered at each stage with enhancement demonstrated, is evidence by the design journey set out in the Design and Access Statement. This is further explored, and the multifunctional aspects of that approach are illustrated, specifically in regard to the different areas of contribution, as set out above in Section 4 of this statement. It is concluded that the proposed scheme will produce a significantly integrated enhancement of different habitats and the relative opportunities they present, and therefore a biodiversity and ecosystem resilience enhancement; while also producing some additional ecosystem service benefits which are themselves a betterment over the current site.

The accompanying Ecological Appraisal has set out a formal consideration of: the site's baseline; how the potential impacts from the proposed development have been avoided, minimised, mitigated, or compensated for; and what enhancements are proposed / are recommended for inclusion. It therefore illustrates how a net benefit for biodiversity (NBB), with increases in ER within the site and wider area, should be achieved.

The proposed scheme should produce an integrated enhancement of an improved variety and diversity of habitats and the relative opportunities they present, and therefore a biodiversity and ecosystem resilience enhancement; while also producing some additional ecosystem service benefits which are themselves a betterment over the current site.

The scheme is considered likely to not harm any significant existing GI assets, while being likely to provide a good example of multifunctional spaces for people and wildlife. It should therefore be considered to accord with local policy regarding GI as well as having regard to the 'guidance' provided by potential draft RLDP policy considering GI.

5.1. Rhondda Cynon Taf Local Development Plan and SPG

In terms of the priorities of the local policies and SPG, the focus on protecting natural environments, of varying significance, is ensured throughout the proposed-development's scheme of design. Specifically these are LDP policies CS10, AW2, AW7, AW8, AW10, AW14 and NSA16, as well as Nature Conservation SPG.

5.2. Legislative and policy consideration

A suitable NBB, and ER enhancement, have been demonstrated through the application of the step-wise approach. Additionally, as part of the review of the site, and proposed design conception, suitable multi-functional benefits for both wildlife and people have also been considered by the framework of Ecosystem Services (ES). The proposed development has therefore adequately provided an enhancement of ES as part of the proposal; and adhered to good practice as part of this.

Appropriate regard has been given as part of the design process to Section 6 duties of local authorities, and Section 7 habitats that may be near the site, and have the potential to be impacted by the proposed development.

The scheme is therefore evidenced as complying with not only the requirement of PPW Chapter 6 but also other PPW chapters and the FW national policy, Local Policy, plus relevant legislation regarding or associated with aspects of Green Infrastructure. The proposed development also accords with the statutory duties of a local planning authority, with regard to Environment (Wales) Act 2016. A positive planning decision should therefore be positively with regard to these considerations.

6. Conclusion

This GI Statement is considered to be proportionate to the scale and type of development proposed, and the comprehensive scheme of overall enhancement which is proposed. The statement sets out the measured baseline, the predicted impacts from the proposal and how these are managed within the design, and examines these via the mechanism of the step-wise approach, DECCA and ES frameworks. It also shows how the scheme complies with the relevant local policy context and any other aspects of PPW 12 beyond the GI Statement requirement. The scheme is considered to be an appropriate design, regarding GI, in the context of the site and local context or nearby/adjacent habitats of importance, and wider GI networks.