

Brookland Road

Outline Green Infrastructure Statement

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Contents

| | |
|--|----------|
| 1. Introduction and Background | 1 |
| 2. Policy and Legislative Context | 2 |
| 2.1. Legislation | 2 |
| 2.1.1. Environment (Wales) Act 2016 | 2 |
| 2.2. National and Local Policy | 2 |
| 2.2.1. Planning Policy Wales, Edition 12 | 2 |
| 2.2.2. Caerphilly County Borough Local Development Plan up to 2021 (Adopted November 2010) | 3 |
| 2.2.3. Step-wise approach | 4 |
| 3. Proposed Scheme of Development Changes | 5 |
| 3.1. Step-Wise Approach summary | 5 |
| 3.2. Long-term Management Summary | 6 |
| 4. Assessment | 7 |
| 5. Conclusion | 8 |

1. Introduction and Background

This Green Infrastructure (GI) Statement is prepared by The Urbanists Ltd, on behalf of Carrphilly Homes (part of Caerphilly County Borough Council). It accompanies the Outline application for the proposed development of up to 23 residential units, with associated landscape, highways and drainage infrastructure.

The site comprises a small area of previously developed land, currently being recolonised by (ruderal) vegetation and shrubs in parts, and intersected by several fencelines which divide the site. There is currently a building on-site, which lies at the western boundary.

The purpose of a GI Statement ('the Statement') is to demonstrate how GI has been incorporated to provide a positive multi-functional outcome, which is appropriate to the site in question, and must also demonstrate how the Step-wise approach has been applied to ecological considerations. As required, this consideration, and statement to provide evidence of it, will be "proportionate to the scale and nature of the development proposed". As an Outline application, this statement will be relatively brief, considering the site and proposed development as known at this stage, and likely scope of future design details.

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 Caerphilly region provides the policies regarding biodiversity, and specific guidance for Trees and Development (LDP4 January 2017) and Biodiversity Action Plan (March 2002). A recent Green Infrastructure Assessment was undertaken by the local authority for the limited purpose of informing their Replacement Local Development Plan (RLDP) which is of some limited concern for this GI Statement.

The key outcomes of the GI considerations are to be reviewed with regard to three main areas of concern, relating to the ecosystem concepts of: biodiversity value, ecosystem resilience, and ecosystem services.

The Statement is informed by the plans which accompany this Outline planning application, and which are specified throughout as necessary.

2. Policy and Legislative Context

This section sets out the key legislative, planning policy and guidance which inform the requirements 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 - the biodiversity and resilience of ecosystems duty (referred to as the section 6 duty).

Section 6 sets out the biodiversity and resilience of ecosystems duty of all public authorities in Wales, to seek to maintain and enhance biodiversity in their functions, and so promote resilience of ecosystems. Section 7 (Part 1) species and habitats of 'principal importance' for the purpose of maintaining and enhancing biodiversity, and which Welsh Ministers must encourage others to do.

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.

Paragraph 6.4.12 sets out that:

“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.”

Paragraph 6.2.5 further guides the content of GI Statements:

“Proposals should be informed by the priorities identified in green infrastructure assessments and locally based planning guidance”

This Chapter 6 also 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) via the DECCA framework, and therefore their ability to continue to deliver value from GI when under pressure or differing demand.

2.2.2. Caerphilly County Borough Local Development Plan up to 2021 (Adopted November 2010)

The limited Green Infrastructure (GI) Assessment (January 2025), for RLDP purposes, considers the following:

“Until a replacement LDP is adopted, it is recommended that all development applications for planning consent be considered in line with the adopted LDP for the county borough. However, following updates to PPW, with the release of Edition 12 in 2024. All planning proposals must be accompanied by a Green Infrastructure Statement that sets out how green and blue infrastructure assets will be impacted by the development, as well as how they can be integrated into its design. Planning Officers must consider each application by applying the step-wise approach and DECCA framework for resilient ecological networks (RENS), to meet the Councils duty to maintain and enhance biodiversity under Section 6 of the Environment (Wales) Act 2016.”

While the focus on considering strategic Green (and Blue) infrastructure assets in the local authority area, is therefore clearly the adopted LDP policies, the GI Assessment also considers the potential future relevant policy, as part of the RLDP. It sets out the following draft policy:

“Strategic Policy for Inclusion within the Pre-Deposit Plan Policy PS8:

Green and Blue Infrastructure All development proposals must maintain, and enhance green and blue infrastructure assets by promoting the following key functions: 1. Biodiversity and Ecosystem Resilience 2. Landscape & Quality of Place 3. Greenspace Provision 4. Connectivity 5. Water Management and embedding SuDS principles into development proposals from the outset.”

While the forthcoming RLDP policies may need consideration in the future, they are currently of limited weight in any planning decision at the time of writing. The above draft policy is therefore only considered to be guidance of how to comply with PPW Ed.12 requirements, at this stage.

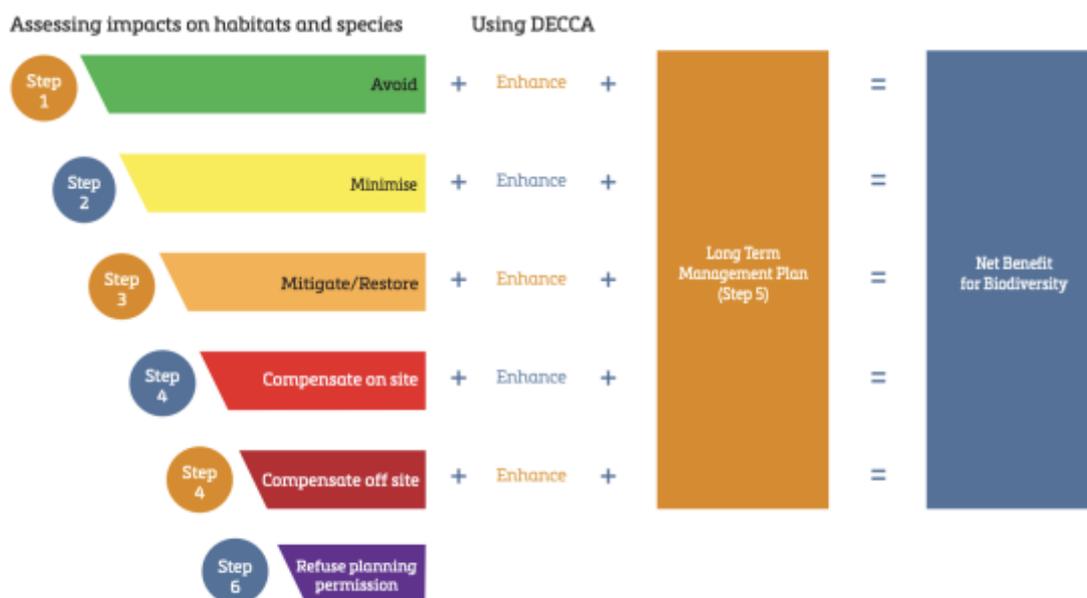
The Adopted LDP policies of relevance to GI, in the context of the proposed development form and location, are the following:

- SP10 Conservation of Natural Heritage
- CW4 Natural Heritage Protection
- CW5 Protection of the Water Environment
- CW6 Trees, Woodlands and Hedgerow Protection

2.2.3. 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 ‘Mitigation hierarchy’ stages, to: 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.

Figure 1: Step-Wise Approach - Extract from PPW Chapter 6¹



¹ Planning Policy Wales Edition 12, Welsh Government, February 2024, Crown copyright 2024, Welsh Government, WG50355, Digital ISBN 978-1-83625-405-8

3. Proposed Scheme of Development Changes

The proposed scheme includes the demolition of existing site buildings and hardstanding and the residential redevelopment, including new roads, parking, gardens, and new green infrastructure assets (SuDS, green spaces, public amenity areas etc.).

3.1. Step-Wise Approach summary

The proposed scheme includes the clearance of the entire existing site, and the loss of the minimally valuable GI assets that exist on the site. Those assets include the amenity grassland areas, areas of tall ruderal and the building present for potential (although not currently present) nesting and roosting opportunities. All habitats were only of importance at the site level or of negligible value, as assessed as part of the Ecological Impact Assessment (EclA) report.

That EclA also considers those losses in context of the proposed scheme at this Outline stage. There are enhancement recommendations within that EclA which should be followed where possible. Should the scheme look to follow those recommendations, it is considered that the scheme will be able to produce an ecological enhancement; and this in a form that follows the Step-wise approach.

The proposed scheme would include new drainage basin habitats that would not only intercept, filter, and attenuate rainfall, but also provide an ecosystem resilience and net benefit for biodiversity; by replacement of habitats present with those more ecologically valuable, for a variety of species. Native hedgerow planting around boundaries would also provide a significant benefit to the scheme, as would native-biodiverse seed mixes if used in grassland areas. These measures would ensure both Regulating and Supporting Ecosystems service enhancements are delivered by the proposed scheme.

The integration of those drainage basins and adjacent green areas for play spaces would provide further Cultural ecosystem services. The further presence of routes through the site's green spaces, for users of the site and people in the local area, would further that Cultural benefit; by increasing the scale of public interaction possible with those green spaces. Further areas of interspersed gardens and public amenity spaces, including a significant increase in tree cover

over the site would all additionally help those Regulating, Supporting, and Cultural services the scheme would provide.

All planting is proposed to be of a size, composition, and (relatively quickly) a condition whereby it can make an almost instant impact to the site, or at least minimise harm in the short-term from any habitat losses or other site changes. Likewise, areas are proposed to be sown with species mixes, where specified, at the first opportunity available.

3.2. Long-term Management Summary

Trees

Management of trees in an appropriate manner to ensure their health and longevity. Ideally, the collection of removed materials and the stacking of this in an area of public open space adjacent hedgerows.

Hedgerows

The pruning, as required, of hedgerow to sustain their amenity function, outside of the bird nesting season (normally March to August). Ideally, these would be left to grow tall to a height of approximately 2m to maximise the ecological potential in their urban context.

Garden and Amenity Space areas

Annual removal of dead vegetation as necessary, and selective removal or other management of any species which become overdominant or spreading.

Grassland areas (in any space)

Ideally, the relaxation of all mowing between spring and summer months, with a single late summer cut after flowering / seeding of species present, the allowing of arisings to drop-seed for several days before their removal. The recurring mowing over autumn and winter, as necessary to maintain a relatively short sward height to control dominant 'weed' species, with all arisings removed.

Alternatively, in areas of high traffic or other amenity use, the regular mowing as required and removal of all arisings, with ideally a relaxation of this at least throughout the month of May (as a

key month).

Public Open Space areas

Annual removal of large areas of dead vegetation, otherwise leaving minor dead brush in situ for wildlife, where it is safe to do so.

Drainage Basin

Annual Pruning of shrubby specimens, cutting and removal of herbaceous and grass species as necessary for function of those features.

Annual removal of dead vegetation as necessary, and selective removal or other management of any species which become overdominant or spreading.

The selective scalping of sediment as required to fulfil those areas functions as drainage basins; ideally on no more than a biennial basis (once every 2 years), to allow vegetation to be reseeded or naturally re-establish (as suitable).

4. Assessment

The site's relatively limited ecological (baseline) value at present makes the adherence to the Step-wise approach's requirement more simple to satisfy. As such, the scheme has looked to provide evidence that an enhancement is achievable, despite the loss of large areas of the site to hardstanding and built form.

The Mitigation hierarchy is to be considered and enhancement demonstrated at each 'stage', as part of Reserved Matters once details of planting are known. This would ideally be demonstrated, and the design journey illustrated, in a Design and Access statement. The further multifunctional aspects of that approach should also be illustrated. The different habitat areas' contribution to ecosystem services, as well as a consideration of the biodiversity benefit and ecosystem resilience enhancement should be further detailed in a (Full) Green Infrastructure Statement.

The conclusion is that 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 detail required to confirm the scale of this benefit with consideration against the losses at the site, would be present at a reserved matters stage. This would then confirm the acceptable 'enhancement' of the scheme, but only once species mixtures are proposed and final layout becomes fixed. It would therefore be appropriate to condition a final scheme of GI / planting, and a further GI Statement assessment of that scheme, as part of Reserved Matters.

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

5. 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.

A suitable NBB and ER enhancement being possible has been demonstrated, through the early stage consideration of the step-wise approach; regarding the current level of scheme detail. Additionally, as part of the review of the site, and proposed design conception, suitable multi-functional benefits for both wildlife and people would be enabled. This again, assuming that the details provide confirmation of the scale of those benefits as producing an appropriate enhancement.

The statement sets out the measured baseline, the predicted impacts from the proposal at this outline stage, and how the habitats could be 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.