

Land adjacent to East Bay Close, Cardiff

Green Infrastructure Statement

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1. Introduction and Background

This Green Infrastructure (GI) Statement is prepared by The Urbanists Ltd, on behalf of Northpoint (Residential Holdings). It accompanies the full planning application for the erection of a purpose built student accommodation (PBSA) building at Land adjacent to Rosemary Street, Cardiff.

Following updates to Chapter 6 (Biodiversity) of Planning Policy Wales in 2024, GI Statements are a requirement for all planning applications in Wales. The purpose of a GI Statement is to demonstrate how GI (including 'blue' infrastructure if relevant) has been incorporated adequately in a planning proposal. It is expected that this will illustrate that the proposal is compliant with specific processes and outcomes required by Planning Policy Wales Edition 12. In doing so, it will be supportive of other national policy and legislation.

The Statement is informed by other reports, statements, and plans which accompany the planning application, these include:

- Ecological Appraisals
- Design and Access Statement
- Arboricultural Impact Assessments & Tree Protection Plans
- Proposed Landscape Plans
- Drainage Strategy

The Statement should therefore be read in conjunction with these documents.

2. Policy and Legislative Context

This section sets out the key legislative, planning policy and other 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. The current version (PPW 12) explains that a proportionate GI Statement should be submitted with all planning applications and explains the general standards that any statement should seek to meet. PPW 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).

The specific PPW requirements are aimed at ensuring applicants provide adequate information in their planning proposals. They are part of a larger movement in valuing the environment, and help ensure that Local Planning Authorities can comply with their Legislative duties surrounding the environment and sustainable development. The PPW requirements are that the Statement must:

- Identify landscape, biodiversity, geodiversity, historic and cultural features in which green infrastructure plays a part and are already being safeguarded (**The Baseline**);
- Demonstrate that the proposal produces a **Net Benefit for Biodiversity (NBB)**;
- Demonstrate production of an Ecosystem Resilience (ER) enhancement, as part of this NBB;
- Illustrate how the **‘Step-wise approach’** has been applied, to demonstrate the achievement of the previous NBB and ER;

This Step-wise approach sets out the procedure of:

- 1) Initially following the ‘Mitigation hierarchy’ stages during the design process, to sequentially: **avoid, minimise, mitigate/restore** impact to habitats and/or species, **compensate on-site** for their loss, and as a last resort **compensate off-site** for their loss;
- 2) At each of these stages, a proportional habitat and/or species (as relevant) enhancement must be proposed that adequately demonstrates that enhancement by its DECC[A] attributes; and
- 3) A long-term management strategy is additionally required, that would ensure those measures proposed are deliverable and how they aim to result in the level of Net Benefit for Biodiversity (NBB) and ER attributes that are described, as well as any resultant ES benefits gained.

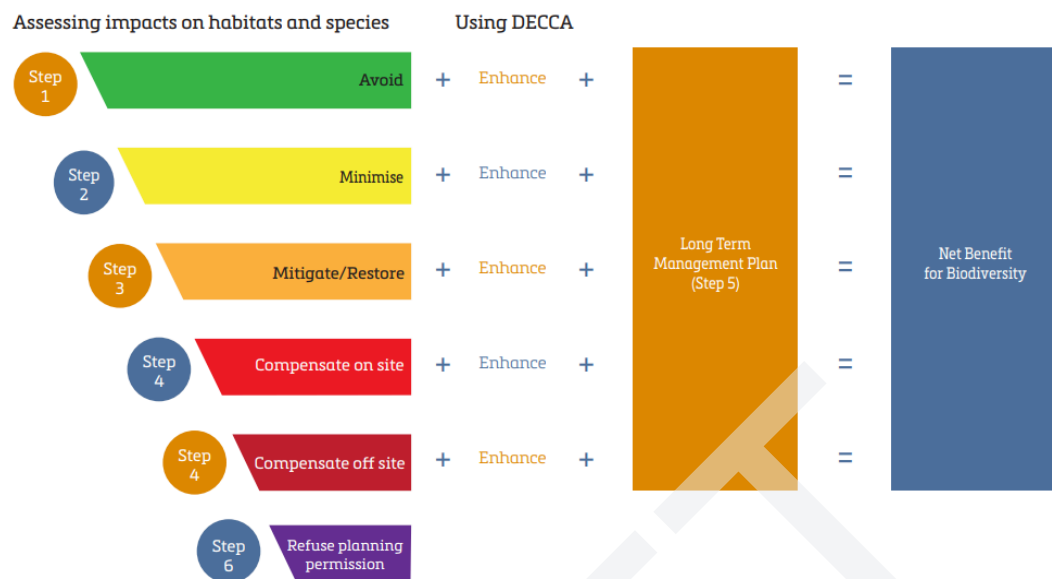


Figure 1: Step-wise Approach (PPW)

As per Point 2 above, the DECCA framework must be used. The 'DECCA' framework (see Figure 2 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 aspect from the other four attributes combined, and which together (**D.E.C.C. & A.**) help us to understand the level ER provided.

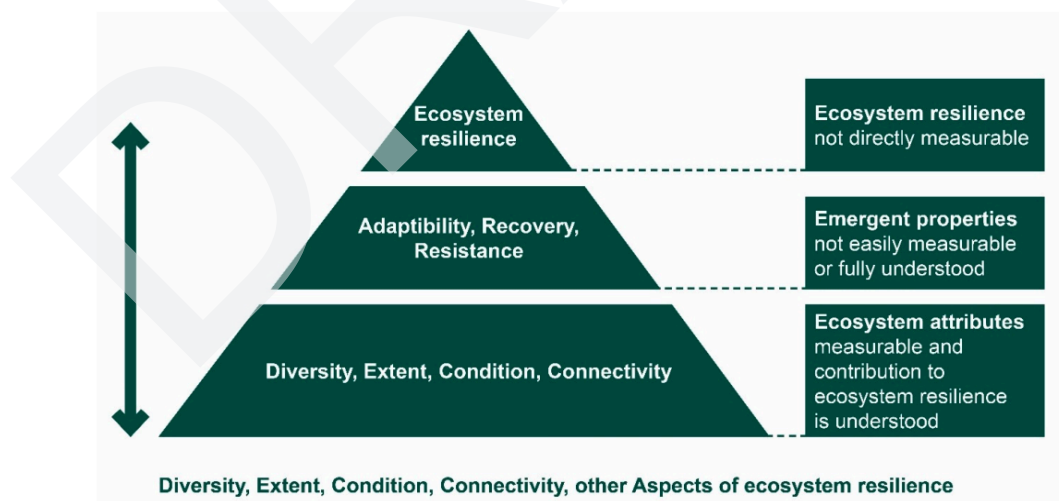


Figure 2: Ecosystem Resilience and the DECCA Framework (Natural Resources Wales)

Finally, PPW12 states that **Building with Nature Standards** represent good practice and are an effective prompt for developers to improve the quality of schemes and demonstrate sustainable management of nature resources. It advises using the standards in a way which is proportionate for the scale and nature of the proposed development with accreditation encouraged but not mandatory.

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

PPW is supported by a number of Technical Advice Notes. 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.

Technical Advice Note 15 - Development, Flooding and Coastal Erosion (2025)

TAN15 provides technical guidance in relation to flooding including a framework for flood risk and advice on consequences. It identifies defended zones for both rivers and sea meaning there is a minimum Standard of Protection of 1 in 100 year events for rivers and 1 in 200 year events for the sea.

2.2.2. Future Wales: The National Plan 2040

Future Wales: 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; it forms part of the Development Plan. 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, for safeguarding and enhancement.

Of particular relevant to GI Statement's, it also sets out that:

"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."

2.3. Local

2.3.1. Local Development Plan

The relevant local Development Plan is the Cardiff Local Development Plan 2006-2026 which was adopted in January 2016. A full analysis of the local policies is undertaken within the accompanying Planning Statement with the policies relevant to green infrastructure considered to be:

- EN7: Priority Habitats and Species
- EN8: Trees, Woodlands and Hedgerows
- KP15: Climate Change

KP15 is a strategic policy which seeks to mitigate the impacts of climate change, of which green infrastructure can play a part. EN7 and EN8 are more specific development management policies which seek to avoid adverse impacts upon protected species as well as trees, woodlands or hedgerows of significant value.

Cardiff Council is preparing a replacement Local Development Plan (2021-2036) to replace the aforementioned LDP. The Replacement LDP Revised Delivery Agreement (February 2025) set an indicative target of September 2025 - March 2026 for Development Plan submission and examination, although there is no indication that submission has taken place to date. The emerging Local Plan is considered to be a material consideration in the determination of this application albeit, based on the available information, the aims and objectives are consistent with the adopted local plan.

2.4.2. Supplementary Planning Guidance

The Development Plan is supported by a number of Supplementary Planning Guidance Documents including one specifically in relation to Green Infrastructure. The SPG comprises various technical guidance notes in relation to ecology and biodiversity, trees, public right of way, open spaces, rivers and soils in order to guide development from a green infrastructure perspective.

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3. Site Baselines

This section sets out a summary of the existing conditions of the 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. It also considers other information available and summarises their influence on the design.

3.1. Site Context

The proposed development site is located within the Cardiff Central Enterprise Zone close to Cardiff city centre. The immediate location forms no distinct overarching character with a mix of large-scale commercial, office and student accommodation as well as the utilitarian nature of the surrounding highways and railway line. The application site is a linear parcel of land located between the Central Link Road flyover to the east and the Cardiff Theatrical Services unit immediately to the west. It is also bounded by the South Wales Mainline railway line to the north. The site forms part of a wider East Bay Close development site with permission already being granted for 319 residential units and 85 serviced apartments to the east of the flyover. The land for the wider site is currently divided (north-south) by a boundary fence which separates the two areas of ownership which is some 100m length and around 25m width.

The site is within a Technical Advice Note 15 Defended Zone for both rivers and sea and there are surface water considerations with part of the site falling within the low risk area for surface water flood risk.

The site is some 1.8km from the Severn Estuary which is designated as a Special Area of Conservation, Ramsar Site, Special Protected Area and Site of Special Scientific Interest (SSSI). It supports internationally important populations of waterfowl, populations of invertebrates of considerable interest and large populations of migratory fish.

The site is also approximately 1.8km from Cardiff Bay Wetlands and Hamadryad Park Local Nature Reserves which mainly comprise wetlands and open grassland, respectively. The nearest Site of Nature Conservation Interest (SINC) is the River Taff SINC, approximately 1km from the site, whilst Ocean Park South is approximately 1.6km to the south east and Blackweir and Dock Feeder is approximately 2km to the north west.

Finally, the site is within 2km of 8 areas of ancient woodland and falls within a designated 'B-line' site albeit the proposal is not expected to directly impact these designations.

Overall, the site context and designations have informed the proposal which has been highly considered and coordinated with the local authority and consultant ecologists.

3.2. Ecological Baseline Summary

Accompanying Ecological survey and assessments have considered the proposed development site's existing ecological context and the potential for supporting any protected or otherwise important species.

The site is largely brownfield, being made up of urban features such as hardstanding, a wall, fencing and arable flower/vegetable beds/pots which the preliminary ecological appraisal indicates can be removed or developed without adverse impacts to protected species. The appraisal also notes the occasional presence of *Buddleia* throughout the site which is a non-native species and thus a threat to the overall biodiversity of the site. There are, however, also some areas of semi-improved grassland and scrub.

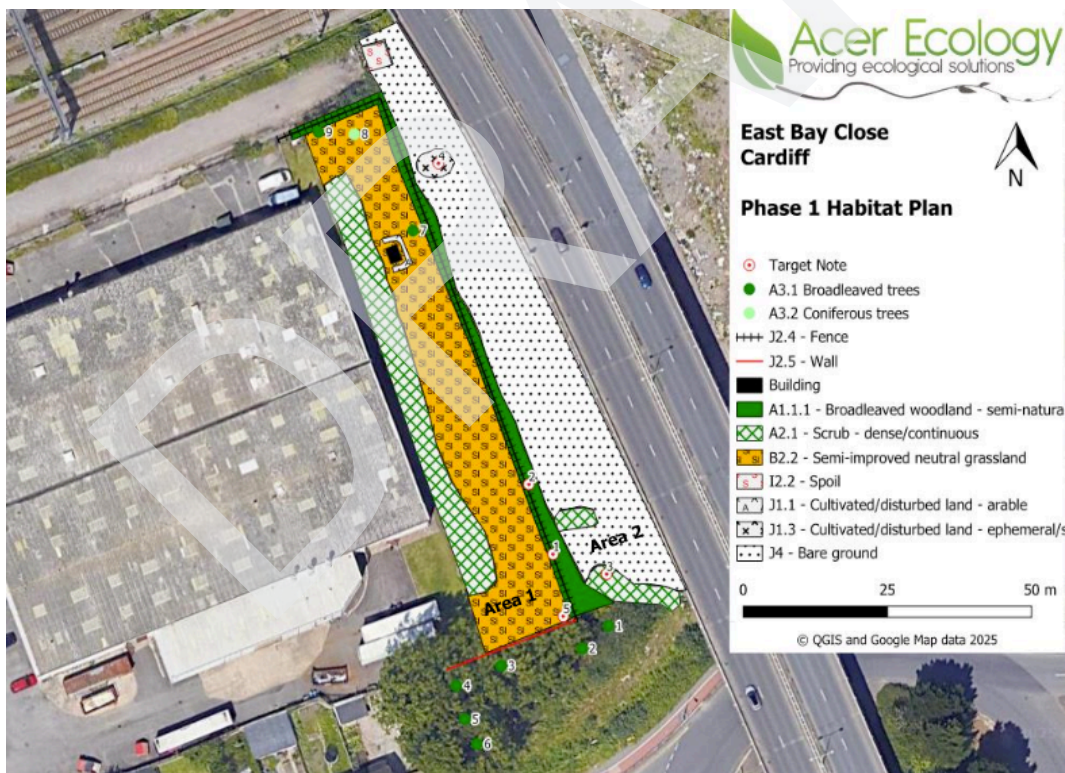


Figure 3: Habitat Baseline (Acer Ecology)

The key areas of potential ecological habitat across the site include multiple areas of dense scrub, neutral grassland and short perennial vegetation including yellow-wort and hawkweed oxtongue. Trees are present and their potential to form habitats for bats is fully assessed in the arboriculture section below but, in summary, the site is of low quality for foraging or commuting habitat and any suitable habitats are isolated and not well connected to other habitats. Whilst there was no evidence of bats on site at the time of the ecological appraisal, desk studies found records of roosts within 1km of the site so mitigation can be provided.

The preliminary ecological appraisal assessed the site for dormice and states that no adverse impacts are envisaged as a result of the development given that there are no records of the species within 1km and no hazel present on site.

There are no ponds within 500m of the site and there are no records of common amphibians so greater crested newts are also not expected to be impacted. The nearest main watercourse is the Bute East Dock but it is separated by busy roads and buildings; the ecological appraisal therefore considers the likely impact upon otters, water voles or white-clawed crayfish to be negligible. The report also concludes that there is a low risk to hedgehogs and badgers with the latter being prevented from accessing most parts of the site due to walls and fencing and found no evidence of their presence on site. However, at the time of the survey, there was a leaf pile which could have potential for hibernating mammals and reptiles with a detailed mitigation strategy recommended for the latter, including further survey work which will inform timing of works and future mitigation measures.

3.3. Landscape GI Baseline Summary

The site does not fall within any specific landscape designations and the landscape value of the site is limited given the surrounding utilitarian buildings, railway line and other brownfield sites. Similarly, there is existing hardstanding, a wall, fencing and arable flower/vegetable beds which offer little to the overall landscaping. There are some areas of dense scrub, a small area of broadleaved semi-natural woodland and some generally low quality trees on the site but overall, the landscape baseline is considered to be limited.



Figure 4: Landscape Character Photographs (Acer Ecology)

3.4. Arboriculture GI Baseline Summary

As above, the site is within 2km of 8 areas of ancient woodland, albeit the development is not expected to directly impact these assets. The site itself contains a modest area of broadleaved semi-natural woodland as well as scattered trees such as silver birch, cedar and goat willow. Given the contained and urban nature of the site, it is not considered that the trees comprise high levels of amenity value. The Arboricultural Assessment assessed 21 trees on and around the site and found the majority to be Category U or C meaning they are low-quality and either cannot realistically be retained as living trees, or have a limited remaining life expectancy. Seven trees were categorised as Category B meaning moderate quality and there were no Category A trees identified on the site. Four on-site trees are proposed for removal for development purposes and the impact of this is assessed in the Compliance Assessment later in this report.

Trees present on site provided little evidence of roosting bats. Whilst the future potential for roosts could not be fully ascertained due to the presence of dense ivy, the site was collectively found to provide low quality foraging or commuting habitat and any suitable habitats are isolated and not well connected to other habitats. Likewise, the development is not expected to impact the b-line designation. Notwithstanding this, mitigation and enhancement measures can be implemented as discussed later in this Statement.

3.5. SUDS GI Baseline Summary

The site is within a Technical Advice Note 15 Defended Zone for both rivers and sea and there are surface water considerations given that parts of the site fall within the low risk area for surface water flood risk. There is very limited formal water management on site with drainage mainly limited to infiltration and natural run-off. There is, however, an existing balancing pond which is understood to serve the adjacent warehouse building to the west. The balancing pond offers little in terms of green infrastructure being largely overgrown, however, its presence is noted. The Drainage Strategy recommends that the balancing pond be relocated off site and filled in.

4. Green Infrastructure Compliance Assessment

This section will demonstrate how the proposed development has followed the step-wise approach and provides a biodiversity enhancement. It uses the DECCA Framework as well as demonstrating compliance with Building With Nature Standards.

4.1. Step-Wise Approach summary

The following is a summary of how the step-wise approach has been carried out as part of the proposed development schemes design, including its implementation.

Step	Development Measures
Avoidance	The design has sought to avoid or minimise habitat and green infrastructure loss as far as possible. Whilst some clearance may be required, trees and vegetation are retained wherever feasible. Two Category B trees towards the southern boundary are proposed for retention, as are a number of Category U trees beyond the southern boundary. The preliminary ecological appraisal recommends that areas of retained vegetation will be securely fenced off to prevent accidental damage; it is expected that the recommendations of the survey will be conditioned by the LPA. Overall, a significant amount of green infrastructure impact will be avoided.
Minimisation	As above, the loss of trees and habitats has been minimised as far as practicable with this approach informing the design process. The fencing off of retained habitats/trees will minimise any potential impacts, as will carrying out any vegetation clearance outside of the bird breeding season and using soft-felling approaches for tree felling.
Mitigation / Replacement	It is sought to avoid and minimise the impact on green infrastructure as far as possible, however, where there is the potential to impact ecology or green infrastructure, a number of mitigation and replacement measures are proposed. Mitigation measures include; the removal of non-native Buddleia in a safe way, a sensitive lighting strategy, the installation of artificial bat and bird boxes, the implementation of a reptile mitigation strategy and the re-planting of trees.

Step	Development Measures
Compensation on / off site	<p>It is considered that the loss of some low quality trees and vegetation is more than compensated by the re-planting strategy which has followed the necessary 3:1 ratio. Whilst it is not expected that the proposed development will result in the loss of habitat or result in adverse impacts upon protected species, the mitigation measures proposed above are considered to more than compensate for any potential loss. The existing site offers little in the way of quality green infrastructure and so the proposed landscaping strategy is also considered to more than compensate for any loss. As such, no off-site compensation is considered necessary in relation to landscaping and/or habitats.</p> <p>The Drainage Strategy recommends the re-location and filling in of an existing balancing pond with more appropriate SUDS proposed for the site. This includes the integration of green roofs and a 'blue roof' system so that drainage contributes to the overall green infrastructure of the site. In short, the loss of an existing balancing pond is compensated by its re-location off site with the proposed drainage scheme also providing on-site compensation.</p>

4.1.1. Net Benefit of Biodiversity

Using the DECCA framework, measures that have been proposed to ensure a net benefit in biodiversity are outlined in the below table. It is considered that the net benefits set out here also demonstrate ecosystem resilience.

Diversity	<p>Firstly, the removal of a non-native species which is a threat to the biodiversity of the site is expected to result in an opportunity for more diverse native habitat types to thrive on the site. Further, the preliminary ecological appraisal found no clear evidence of nesting birds or bats on site so the introduction of enhancement measures such as bat and bird boxes will also go some way to diversifying the biodiversity on site. This would be alongside the retention of species that were found to have potential habitats on site such as reptiles. The landscaping plans include a range of species proposed for planting with the Local Planning Authority having the capability to control and/or secure these by condition. Other new habitat types such as green roofs, which will integrate with the proposed sustainable drainage system, also offer the capability for additional diversification of biodiversity on-site.</p>
Extent	<p>Given the requirement to re-plant trees at a 3:1 ratio, the extent of trees on site will increase. There will also be an increase in habitats by virtue of the introduction of new features such as the proposed green roofs</p>

	and bat/bird boxes. Formalised sustainable urban drainage systems will also increase the extent of green infrastructure and habitat on site. Overall, it is expected that the extent of biodiversity on-site will be increased.
Condition	The removal of non-native species and dead or dying trees and their replacement with good quality alternatives will go some way to improving the condition of habitats on site. Key protected species such as bats and breeding birds will benefit from this as well as the introduction of nesting boxes. The Local Planning Authority will gain control over the condition and quality of the green infrastructure and habitats through planning conditions whereas there is very little, if any, control presently. Overall, the proposed development is considered to result in an improvement to the condition of habitats.
Connectivity	The preliminary ecological appraisal found that there is insufficient connectivity between habitats on the site with low-quality urban features breaking up habitats. This has resulted in a low suitability for bats in particular. The coherent proposed landscaping approach with trees and other habitats spread evenly through the site is considered to improve connectivity between on-site habitats. Similarly and alongside the retention of trees to the south of the boundary, the proposed placement of trees along the boundary will increase the chances of connectivity to the nearby SINC and other habitats identified above which fall outside of the red line. The ecological appraisal found that the separation distance and built development between the site and water courses meant that there would be little opportunity for pond-based biodiversity but this may be improved by the site-specific drainage strategy.
Adaptability	In summary, the proposed development will represent a net benefit in biodiversity through improving the diversity, extent, condition and connectivity of on-site habitat. This is achieved via increasing the level of habitat through new features such as trees and green roofs, plus improving the existing habitat by removing non-native species, for example. The proposed landscaping scheme will also improve connectivity between habitats by following a more coherent approach with planting close to the boundary also expected to improve relationships with off-site habitats including nearby designated landscapes.

4.1.2. Long-term Management Summary

The long term management of these enhancements are set out below, further demonstrating ecosystem resilience.

Green Roofs	Annual cut after summer, and regular cuts as necessary over winter to reduce more vigorous species.
Existing and New Hedgerows	<p>With regard to the new or existing planting, to secure the establishment and health of new species for the first 5 years.</p> <p>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.</p>
Replacement Trees	<p>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.</p> <p>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.</p> <p>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.</p>
Bat and Bird Boxes	Boxes will need to be replaced or maintained with similar and suitable replacements as soon as necessary.
Ornamental Planting	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.
SUDS	A full maintenance plan for the proposed SUDS is fully set out in the Drainage Strategy. In summary, there will be a need to check and maintain pipework, paving, cellular storage, rain gardens and filters drains at regular intervals to ensure the SUDS remains fully operational for its lifetime.

4.2. Building with Nature Standards

The below table demonstrates how the proposed development will comply with Building with Nature Standards.

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 through diverse biodiversity habitats.	A well-connected landscape for people and protected species through the provision of tree lined thoroughfares and native planting throughout. The enhancement of landscape features as well as the incorporation of the new terrace planting creates a better connected space.
Standard 2 Positively Responds to the Climate Emergency	The proposed GI enhances the baseline condition through new and wider habitat creation, with native species renowned for their high carbon capture properties in addition to other benefits in relation to surface water runoff, connectivity and noise reduction.	A more diverse and varied landscape compared with existing and which has aspirations for longevity. The proposed scheme incorporates SUDS to assist with water runoff capture and pollution prevention.
Standard 3 Maximises Environmental Net Gains	The diverse and varied landscape proposal has been influenced by existing features of value to maximise environmental benefits.	New planting and mitigation measures are expected to offset the habitat removal necessitated by the development as well as any other potential adverse impacts. Other improvements as a result of the development include the removal of non-native species.
Standard 4 Champions a Context Driven Approach	The proposed GI approach has been influenced by the existing context from the outset, including the trees to the south, while the new planting to the north will frame the site as a pinnacle of GI in the wider locality.	The proposed development has sensitively responded to the constraints and opportunities for tree value within and adjacent to the site.

Standard	Assessment	Outcome
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 materials and boundary treatment contributes to create a unique and attractive, yet functional place.	The proposal increases and enhances landscape connectivity in the locality, bringing vitality to the site and wider area which is otherwise relatively characterless.
Standard 6 Secures Effective Place-keeping	The scheme landscape design aims to minimise the need for intervention in terms of management and maintenance.	The use of native species results in management requiring minimal intervention and thus allowing native species to flourish. The LPA may choose to implement conditions such as for Construction Management Plans and landscaping management to further control and ensure the long-term management of the scheme if this is considered necessary.
Wellbeing Standards		
Standard 7 Brings Nature Closer to People	The proposed landscape design enriches the site by using integrated planting throughout such as green roofs and well-planted terraces.	The building is integrated with green infrastructure in addition to broader habitat creation closer to the boundaries so users of the site will be brought closer to nature.

Standard	Assessment	Outcome
Standard 8 Supports Equitable and Inclusive Places	The site is not publicly accessible prior to the development.	Whilst the proposal relates to PBSA, the site is not currently accessible to the public and prospective occupants of the scheme will benefit from the highly sustainable location, integrated green infrastructure and accessibility measures that will meet national building control standards.
Water Standards		
Standard 9 Delivers Climate Resilient Water Management	The proposed development will improve the management of surface water by the proposed SUDS measures.	SUDS includes the creation and inclusion of planted rain gardens to allow for improved water quality management and ecological resilience.
Standard 10 Brings Water Closer to People	The SUDS features will be viewable at areas within the site, comprising part of the overall green infrastructure.	The creation and inclusion of planted gardens allow for new incorporation of visibly enhanced landscape features into the site.
Wildlife Standards		
Standard 11 Delivers Wildlife Enhancement	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 through precautionary working methods and where impacts are unavoidable, both mitigation and enhancement measures	A number of habitat and species based enhancements have been included within the proposals. All habitats and mitigation measures will be maintained; this can be secured through

Standard	Assessment	Outcome
	in line with legislative and policy requirements will be delivered.	planning conditions where necessary.
Standard 12 Underpins Nature's Recovery	Existing trees will be retained where possible and existing habitats will be protected during the construction and operational phases of the development. Enhancements are proposed to further contribute to nature recovery.	New planting across the site will enhance the connectivity between on-site habitats, as well as enhance the resilience of existing off-site habitats. This will contribute to meeting wider nature recovery goals.

4.3. Compliance with Policy

Given the findings set out in the above tables, it has been demonstrated that national planning policy which requires adherence to the step-wise approach, DECCA framework and demonstrating a net gain in biodiversity has been complied with.

In doing so, it is also considered that the development will contribute to mitigation against climate change through the green infrastructure proposals and will avoid adverse impacts upon protected species as well as trees, woodlands or hedgerows of significant value. As such, the development is considered to be in compliance with KP15, EN7 and EN8 of the Cardiff Local Development Plan 2006-2026, as well as being consistent with guidance set out in the local Green Infrastructure SPG.

5. Conclusion

This GI Statement is considered to be proportionate to the scale and type of development proposed. It has outlined the green infrastructure baselines for the site and followed the Step-wise Approach and DECCA Framework in order to ultimately demonstrate a net gain in biodiversity and ecosystem resilience. It has also demonstrated compliance with Building with Nature Standards.

In summary, mitigation and enhancement measures include:

- Avoiding habitat loss where possible;
- A comprehensive re-planting scheme at a 3:1 ratio;
- Protected species enhancements such as bat and bird boxes;
- Reptile mitigation strategy;
- Integrated SUDS;
- Removal of non-native species;
- Precautionary approach to works; and
- Sensitive lighting strategy.

Overall, the development is considered to be appropriate in GI terms and complies with both PPW and local policies.