**Green Infrastructure Statement**   
Sloper Road, Cardiff, CF11 8AB

November 2024

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| **Introduction** | |
| Client | This statement has been prepared on behalf of Pink Storage. |
| Scope | This Green Infrastructure Statement accompanies the submission of a retrospective Full Planning Application for “use as a self-storage facility (Use Class B8 Storage and Distribution) together with the siting of shipping containers and associated infrastructure” at Sloper Road, Cardiff. |
| Context | Green Infrastructure Statement are required to be submitted with all applications for planning permission in Wales. The statement should be proportionate to the scale and nature of the development proposed and should describe how green infrastructure has been incorporated into the proposal.  This Green Infrastructure Statement should be read in conjunction with the Planning Statement, Design and Access Statement and architectural plans. |
| **Site Details** | |
| Site Address | Sloper Road, Cardiff, CF11 8AB |
| Site Location | *Fig.1 Site Location Plan* |
| Site Description | The Pink Storage Facility (the ‘Site’) is broadly square in shape and is located in a mixed-use residential and industrial area. The Site was previously used for bus and coach storage associated with Cardiff Bus and Coach Station, which is located on Sloper Road within close proximity of the Site. With this previous use having ceased in December 2021, the Site is now used as a self-storage with individual shipping containers and associated infrastructure located across majority of the Site. The Site is surfaced in hard standing (primarily tarmacadam), with a pre-existing coach shed located near the front of the site that now houses several storage units. To the northern, southern and western boundaries the Site is enclosed by palisade fencing. To the east the Site is bound by green wooden fencing, with the entrance restricted by a mesh gate that is operated by a key code.  Beyond the immediate site boundaries, existing residential properties lie to the east at the, to the west lies the Cardiff City Stadium and industrial and commercial businesses lie to the north and south. |
| **National Planning Policy** | |
| Planning Policy Wales (Edition 12 2024) | **Planning Policy Wales (Edition 12) - February 2024**  PPW aims to contribute towards the delivery of sustainable development, embedding the principles of the Well-being of Future Generations (Wales) Act 2015. PPW ingrains Placemaking Wales Charter and how sustainable development can be achieved through implementing placemaking.  Section 6.2 sets out green infrastructure should be given early consideration in development proposals and how it should be integrated into developments.  “the network of natural and semi‑natural features, green spaces, rivers and lakes that intersperse and connect places. Component elements of green infrastructure can function at different scales and some components, such as trees and woodland, are often universally present and function at all levels. At the landscape scale green infrastructure can comprise entire ecosystems such as wetlands, waterways, peatlands and mountain ranges or be connected networks of mosaic habitats, including grasslands.”  “At a local scale, it might comprise parks, fields, ponds, natural green spaces, public rights of way, allotments, cemeteries and gardens or may be designed or managed features such as sustainable drainage systems. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks”  Within 6.2.11 it goes on to state that the “quality of the built environment should be enhanced by integrating green infrastructure into development” and the Green Infrastructure Statement will be “an effective way of demonstrating positive multi-functional outcomes which are appropriate for the site in question and must be used for demonstrating how the step-wise approach has been applied”  This series of updated policy has a stronger emphasis on taking a proactive approach to green infrastructure and references the Building with Nature Standards - Delivering High Quality Green Infrastructure in Wales as an example of good practice to ensure that appropriate considerations have been taken into account.  The green infrastructure statement should be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (Paragraph 6.4.15 of Planning Policy Wales) has been applied. This is the means of demonstrating the steps which have been taken towards securing a net benefit for biodiversity.  The Step Wise approach has been summarised below:   1. Avoid 2. Minimise 3. Mitigate/Restore 4. Compensate   *Fig.2 Summary of the Step Wise Approach - Planning Policy Wales Edition 12, Page 148*  Avoid  Aim to maintain biodiversity by avoiding loss or damage to biodiversity (i.e. the variety of species and their abundance). Consider whether the development is really needed, whether it could be located elsewhere, sited or designed differently, or incorporate or be replaced in part by a nature-based solution.  Minimise  When all options for avoiding loss or damage to biodiversity have been exhausted, development should seek to minimise the initial impact on biodiversity and ecosystems on the site by:   * maintaining the largest possible area of existing habitat supporting biodiversity and functioning ecosystems * retaining existing features (e.g. trees, hedgerows, ponds), and * using innovative solutions to avoid damage and maintain existing biodiversity features and ecosystems.   Mitigate  Where after measures to minimise impact, biodiversity and ecosystems could still be damaged, the proposed development should aim to mitigate that damage - ‘like for like’ in the case of priority habitats and species and in every case seek to build ecosystem resilience within the site and where possible the wider area.  Having mitigated loss, a scheme of enhancements should be provided to ensure a net benefit for biodiversity. These could include on-site habitat creation and/or could be part of the development itself using biodiverse nature-based solutions such as SUDS, green roofs, woodland expansion, and wetland creation. Improving ecosystem resilience through the DECCA attributes, particularly improving connectivity to the immediate surroundings would be a key contribution to on-site mitigation and enhancement.  Compensate  When all other options have been exhausted, and where modifications, alternative sites, conditions or obligations are not sufficient to secure biodiversity outcomes, off site compensation for unavoidable damage must be sought. Compensation measures should be guided by place-based evidence and the priorities as set out in SoNaRR, the Area Statement and/or Green Infrastructure Assessment and must be secured and established far enough in advance before the loss of biodiversity on site. |
| Future Wales: The National Plan | **Future Wales – The National Plan**  The National Plan provides a strategy for addressing key national priorities through the planning system, including achieving climate-resilience, developing strong ecosystems and improving the health and well‑being of our communities. It also embeds the principles of the Well-being of Future Generations (Wales) Act 2015.  *Fig.3 The seven well-being goals from Well-being of Future Generations (Wales) Act, 2015*  The key policy in relation biodiversity and green infrastructure is Policy 9 – Resilient Ecological Networks and Green Infrastructure. It states, “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.”  The Wellbeing of Future Generations Act requires public bodies to carry out sustainable development. The principle of sustainable development is “the process of improving the economic, social, environmental and cultural well-being of Wales.”  The principle is made up of five ways of working, including looking to the long-term; taking an integrated approach; involving a diversity of the population; working collaboratively; and preventing issues. It sets out seven well-being goals including resilience and being globally responsible. |
| Environment Wales Act (2016) | **Environment (Wales) Act 2016**  This legislation is intended to work alongside the Well-being of Future Generations Act. It included a new biodiversity duty to reverse the decline of biodiversity and to secure long-term resilience. Section 6 states “A public authority must seek to maintain and enhance biodiversity… and in so doing promote the resilience of ecosystems”.  In relation to resilience of ecosystems, the following should be taken into account:   1. diversity between and within ecosystems; 2. the connections between and within ecosystems; 3. the scale of ecosystems; 4. the condition of ecosystems (including their structure and functioning); 5. the adaptability of ecosystems. |
| **Local Planning Policy** | |
| Cardiff’s Local Development Plan 2010-2025 | **Cardiff Local Development Plan 2010-2025**  The Cardiff Local Development Plan was adopted in January 2016. In relation to green infrastructure, Policy KP16: Green Infrastructure states:  “Cardiff’s distinctive natural heritage provides a network of green infrastructure which will be protected, enhanced and managed to ensure the integrity and connectivity of this multi-functional green resource is maintained.  Proposed development should therefore demonstrate how green infrastructure has been considered and integrated into the proposals. If development results in overall loss of green infrastructure, appropriate compensation will be required.  Natural heritage assets that are key to Cardiff’s character, value, distinctiveness, and sense of place.  They include the City’s: […]   1. Biodiversity interests including designated sites and the connectivity of priority habitats and species (EN5, EN6 and EN7); 2. Trees (including street trees), woodlands and hedgerows (EN8); 3. Strategic recreational routes, cycleways, and the public rights of way network (T5, T6 and T8); 4. Parks, playing fields, green play areas and open spaces (C4 and C5); and 5. Growing spaces including allotments, community orchards and larger gardens; and 6. Holistic integrated surface water management systems (EN10).” |
| Supplementary Planning Guidance | The Cardiff Local Development Plan is supplemented by a series of Supplementary Planning Guidance (SPG). These provide applicants and decision makers with further information on how the policies of the Cardiff Local development Plan (LDP) will be applied.  The following SPG are of relevance to Green Infrastructure:  Cardiff Green Infrastructure SPG (2017)  Cardiff Green Infrastructure SPG provides further guidance to Policy KP16: Green Infrastructure.  The definition of green infrastructure in accordance with the Supplementary Planning Guidance is:  “*Green infrastructure is a network of multi-functional, connected green spaces that make the best use of land and provide green open space for all, helping wildlife to flourish, and delivering a wide range of economic, health and community benefits”.*  Section 2.1.5 states for ‘Major developments’:   * New major developments should include a Green Infrastructure Statement which should be appropriate to the scale of the development * The Green Infrastructure Statement should take account of all the elements of green infrastructure as set out in Policy KP6 * Green infrastructure should be considered in terms of the phasing of the development and in conjunction with adjacent developments to achieve connectivity   Section 2.2.1 states “For all major developments, the existing green infrastructure resource in and around the site…must be described and assessed.” Section goes on to state “The likely impact of the proposals upon green infrastructure features must be assessed. This should include a holistic assessment of all of the elements of green infrastructure, including the synergies and trade-offs between them.” Section 3.1.1 states “Where the green infrastructure resource at a site has been identified, and the impacts of a proposed development have been assessed, the subsequent mitigation approach should take into account all relevant elements of green infrastructure”. |
| **Existing Green Infrastructure** | |
| Existing Assets | This Green Infrastructure Statement was informed by a site walkover to confirm the existing green infrastructure elements on the site and in the surrounding area. As identified above, the application site itself is entirely hard standing, however existing green infrastructure elements in the immediate locality of the site include:   * Hedgerows and shrubs outside the development boundary on the northern, western and southern boundaries   The green infrastructure elements are described briefly below, identifying and accessing existing or potentially important elements. It summarises the Stepwise approach Step A – Identify and Assess.  Ecology  No ecology surveys are required for the site given that there are no ecology habitats within the site. The application relates to a use of land together with operational development comprising of the siting of storage units on the previously existing hardstanding (i.e. no physical works have been undertaken to the ground and none are proposed which could impact on off-site habitats). As such, off-site ecological value has been retained, and appropriate measures were taken during the formation phase of the development to ensure pollution control.  Trees  No tree survey is required for the site, due to the development site being entirely hard standing and no physical works to the ground having been undertaken/proposed. Small hedgerows and shrubs line the northern, western and southern boundaries. However, these collections of shrubs do not lie in the vicinity of boundary lines of the Site and were retained and safeguarded as part of the construction process of the shipping containers.  Drainage  The site will be subject to Sustainable Drainage requirements as part of a separate SABs application, which will be submitted in due course.  Landscape  The site held no landscape and amenity value due to its previous use as a storage site as a bus and coach store. |
| **Assessment** | |
| Green Infrastructure Enhancement & Mitigation | In alignment with local and national Planning Policy, a stepwise approach has been utilised for the Site proposals, proportional to the size, scope and context of a change of use application for existing dwellings, as outlined in PPW Edition 12 Chapter 6. Section 6.2 sets out that at smaller scalers “individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks”.  Step A has been addressed in the earlier sections of this document, identifying existing Green Infrastructure (GI) assets.  Step B’s objective is to avoid GI loss wherever feasible. The nature of the works are such that there has been no loss of any identified GI assets, and nor are any proposed.  Step C involves designing and responding to any unavoidable losses to achieve a net improvement in the GI and biodiversity value of the site. However, the application does not include any GI loss, and thus Step C is not applicable.  Current operations on site have adhered to all environmental requirements set out by Planning Policy Wales (PPW), ensuring the effective mitigation of emissions and minimizing any adverse impact on the local area. The change of use from a bus depot, reduces both noise and pollution to the surrounding residential area, greatly improving its character. Unlike the constant movement of buses, the storage facility will generate far less noise, with activity largely limited to loading and unloading. This decrease in traffic well alleviate congestion, improve air quality, and create a safer and quieter environment for residents. This targeted approach to environmental stewardship has provided more direct benefits than broader green infrastructure measures and diminishes the need for new green infrastructure on site.  In accordance with the practicable constraints on the site, the incorporation of green infrastructure would reduce optimal usage on site. By accessing environmental stewardship in relation to pollution control, the site therefore complies with Policy KP5, *‘Promoting the efficient use of land, developing at highest practicable densities’* whilst still optimising its potential to help mitigate environmental pollution.  With the business requiring no on-site staff, it diminishes the need for any additional green infrastructure as it typically serves as outdoor or amenity space for employees. The lack of personnel and in line with the industrial characteristics of the site, it reduces the necessity to incorporate landscaping in this application.  The site situates itself within close vicinity to several green spaces that act as a sufficient network of outdoor areas for the Site, and therefore further reduces the necessity to include green infrastructure on this industrial site.   |  |  | | --- | --- | | Open Space | Walking Distance (Minute) | | Jubilee Recreation Ground | 4 | | Sevenoaks Park | 13 | | Ninian Park | 15 |   Furthermore, the green infrastructure on the site boundary has been retained, with no losses recorded. |
| **Conclusion** | |
|  | The current utilization of the site for storage and distribution activities inherently limits the feasibility of integrating landscaping measures aimed at enhancing green infrastructure. Given its location sandwiched between industrial/commercial sites, additional green infrastructure may not yield significant ecological benefits, particularly in terms of supporting local biodiversity. The focus has therefore been on safeguarding the existing natural features.  It is therefore concluded that, given the nature and location of existing green infrastructure assets and the scope of the application, the development successfully meets the aims and objectives of Planning Policy Wales and Cardiff Local Development Plan in respect of protection and enhancement of Green Infrastructure. |