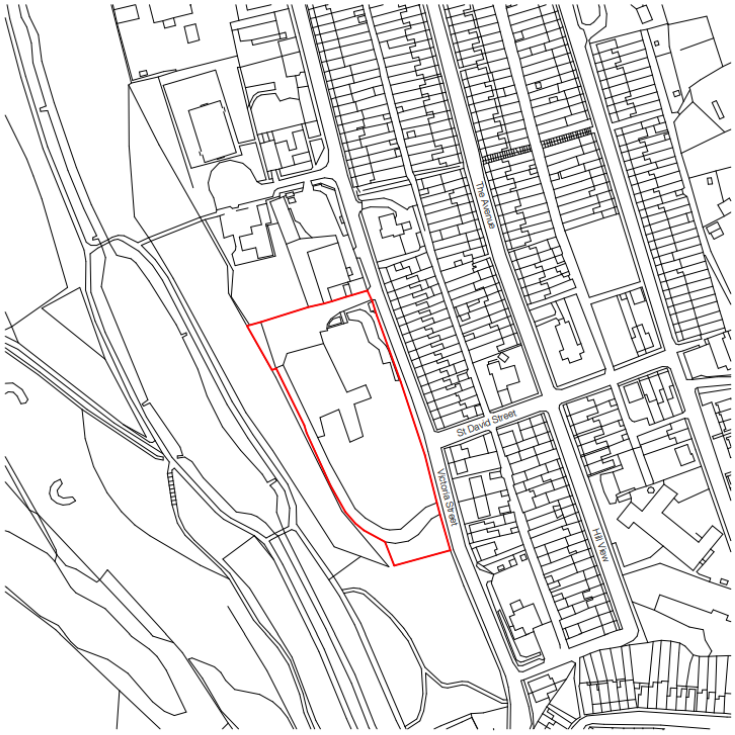
Green Infrastructure Statement

Land at Victoria Street, Pontycymmer

November 2025

amity

planning consultants

Introduction	
Client	This statement has been prepared on behalf of Kyle Spiller Ltd.
Scope	This statement accompanies an outline planning application for proposed *"Erection of up to 31 affordable dwellings (outline application with all matters reserved except access)"* at Land at Victoria Street, Pontycymmer.
Scope	Due to recent changes in Welsh Government policy, a Green Infrastructure Statement should now be submitted with all planning applications. The statement will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. This Green Infrastructure Statement should be read in conjunction with the following relevant documents: - Tree Survey and Constraints Plan - Preliminary Ecology Appraisal - Phase 1 Habitat Survey Report - Ecology Enhancements Addendum - Proposed Drainage Strategy - Concept Site Plan with Planting
Site Details	
Site Address	Land at Victoria Street, Pontycymmer.
Site Location	*Fig.1 Site Location*  ***Site location plan*** 1 : 2500

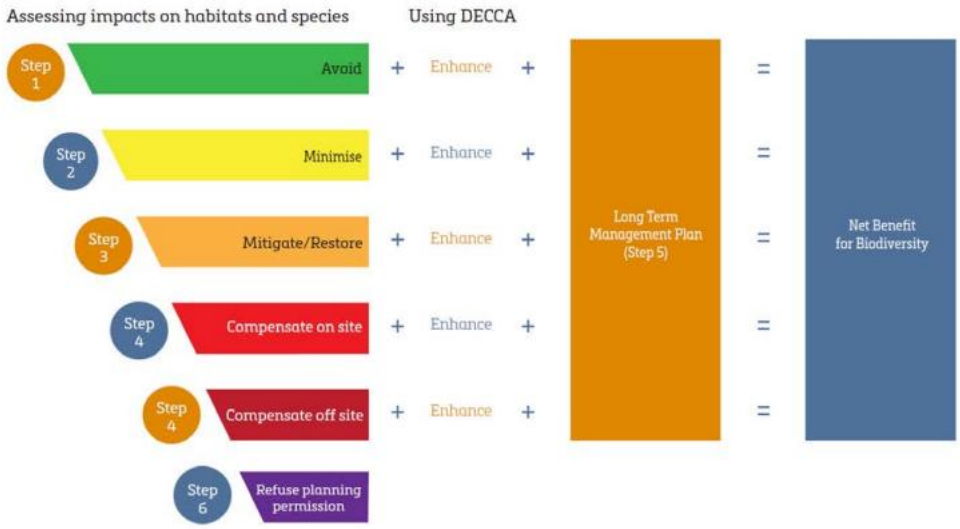
Site Description	The application site comprises an area of land measuring approximately 0.75 Hectares, which is bordered to the east by Victoria Street, located within the settlement boundary of Pontycymmer. The site comprises brownfield land and was previously occupied by several buildings which formed part of the Ffaldau Colliery. The site has been vacant for many years and until recently was overgrown with vegetation. The shape of the site is roughly rectangular, and it narrows towards the southern boundaries of the site. Most of the site consists of early successional vegetation growth with hardstanding and fragmented areas of coarse grassland. The topography of the site slopes away from Victoria Street and has steeply sloping embankments to the western and southern boundaries.
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



<u>Avoid</u>
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.

<u>Minimise</u>
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.

<u>Mitigate</u>
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. <u>Compensate</u> 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: a) diversity between and within ecosystems; b) the connections between and within ecosystems; c) the scale of ecosystems; d) the condition of ecosystems (including their structure and functioning); e) the adaptability of ecosystems.
Local Planning Policy	
Bridgend County Borough Council Local Development Plan	**Bridgend County Borough Council Local Development Plan (2018-2033)** The following relevant Local Development Plan policies have been identified: <u>SP17: Conservation and Enhancement of the Natural Environment</u> The County Borough has a rich and varied biodiversity with a broad range of species, habitats and unique, rich landscapes. Development which will conserve and, wherever possible, enhance the natural environment of the County Borough will be favoured. Development proposals will not be permitted where they will have an adverse impact upon: 1) The integrity of the County Borough's countryside; 2) The character of its landscape; 3) Its biodiversity and habitats; and 4) The quality of its natural resources including water, air and soil The weight to be afforded to environmental designations in the determination of relevant planning applications will be based on their statutory or non-statutory status and geographical scale of designation. Proposals likely to have direct or indirect adverse effects on Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites, must be subject to Habitats Regulations Assessment (HRA). <u>DNP6: Biodiversity, Ecological Networks, Habitats and Species</u> All development proposals must contribute to biodiversity net gain and improved ecosystem resilience, as demonstrated through planning application submissions. Development proposals must maintain, protect and enhance biodiversity and ecological networks / services. Particular importance must be given to maintaining and enhancing the connectivity of ecological networks which enable the dispersal and functioning of protected and priority species. Development proposals that result in an adverse effect on the connectivity of

biodiversity and ecological networks and/or have a significant adverse effect on the resilience of protected habitats and species will only be permitted where:

1. The need for development outweighs the nature conservation importance of the site;
2. It can be demonstrated that there is no satisfactory alternative location for the development which avoids nature conservation impacts;
3. A functional connected element of the natural resource is retained as part of the design of the development; and
4. Any unavoidable harm is minimised by effective mitigation to ensure that there is no reduction in the overall nature conservation value of the area. Where this is not feasible, compensation measures designed to conserve, enhance, manage and, where appropriate, restore natural habitats and species must be provided.

Where habitats and species are likely to be disturbed or harmed, development proposals will be assessed in accordance with National Planning Policy and Guidance. Developers will be expected to provide: an ecological survey; an assessment of the likely impact of the proposal on the protected species/ habitats; and, where necessary, make appropriate provision for their safeguarding, mitigation and/or compensatory measures. In addition measures to enhance biodiversity, such as through habitat creation, will be expected.

DNP7: Trees, Hedgerows and Development

Development that would adversely affect trees, 'special trees', woodlands and hedgerows of public amenity or natural/cultural heritage value, or that provide important ecosystem services, will not normally be permitted. Development proposals on sites containing or adjacent to, trees will be required to assess the trees in line with BS 5837:2012 Trees in relation to design, demolition and construction. The assessment must include:

1) a tree survey;
2) an arboriculture impact assessment;
3) an arboriculture method statement;
4) and/or a tree protection plan.

Where trees are to be replaced a scheme for tree replacement must be agreed prior to the commencement of development, including details of planting and aftercare. If tree works are recommended, the works must comply with BS 2998:2010 Tree Works.

DNP8: Green Infrastructure

Development proposals will be required to integrate, protect and maintain existing green infrastructure assets and to enhance the extent, quality, connectivity and multifunctionality of the green infrastructure network. Where the loss or damage of existing green infrastructure is unavoidable, appropriate mitigation and compensation will be required.

All developments must seek to maximise, as far as practicable, the amount of green infrastructure on the site, as well as the interconnectedness of green infrastructure within and around the site to the wider green infrastructure network.

Development must also maximise opportunities to achieve multi-functionality by bringing green infrastructure functions together. All major developments will be required to submit a Green Infrastructure Assessment.

	Policy DNP8 seeks to ensure that Bridgend's green infrastructure assets are valued, protected, enhanced and managed through a green infrastructure network. At the landscape scale green infrastructure assets can comprise entire ecosystems such as wetlands, woodlands, heathlands and waterways. At a local scale, it might comprise of parks, fields, footpaths, Public Rights of Way, cycle ways, common land, open access land, allotments, cemeteries, landscaped areas and gardens. At smaller scales, individual urban interventions such as street trees, roadside verges, and green roofs can all contribute to green infrastructure networks. The County supports a wealth of Green Infrastructure assets that together comprise the strategic network, which is set out in the Green Infrastructure Assessment (2021). The location, quality and condition of all existing Green Infrastructure assets and landscape and ecological elements and features on, and adjacent to the site, and those subject to: i) potential impacts from the development, and details of how the impacts have been avoided and minimised through specific design and protection measures; ii) unavoidable impacts from the development, and details of how the impacts have been mitigated, or compensated for within the proposed development layout and landscape design scheme; 203 Effective design solutions which maximise opportunities to: enhance the quality and extent of existing; and enable the creation of new Green Infrastructure assets and landscape and ecological elements and features, to enhance the connectivity and multi-functionality of the Green Infrastructure Network. Further guidance on Green Infrastructure as part of development will be prepared as SPG in support of the placemaking agenda and the creation of high quality and biodiverse living environments.
Bridgend Green Infrastructure Assessment (2021)	The Bridgend Green Infrastructure Assessment has been prepared guide and shape the planning and delivery of green infrastructure in Bridgend. It forms the baseline for a holistic, positive and proactive approach to the management and enhancement of Bridgend's natural assets, in particular when associated with the level of growth identified in the revised Local Development Plan (LDP) which was recently adopted in March 2024. A green infrastructure strategy provides the opportunity to create a coordinated response to a number of these issues discussed in these sections. The issues have been identified as priorities and split into six key green infrastructure themes. These priorities include: • Sense of Place; • Health and Well-being; • Biodiversity and Ecological Resilience; • Climate Change, Sustainability and Decarbonisation; • Social Cohesion; and • Economy The assessment states whilst individual green infrastructure assets can serve one or more functions, connectivity between different green infrastructure assets can help maximise the benefits that they generate. Well-connected green infrastructure assets create infrastructure that is adaptive and resilient to environmental changes. Physical connections make the most impact, often by creating physical 'stepping stones' that encourage biodiversity migration and

connect places with sustainable walking or cycling routes. Linked together, green infrastructure assets form important multifunctional green infrastructure networks, which should be considered at all spatial scales.

The list of functions which green infrastructure provides has been simplified by BCBC by grouping the functions which are similar and provide broadly the same benefits. The table below shows similar functions grouped according to delivery against our 6 green infrastructure themes:

Fig.2 Green Infrastructure Assets and Functions (Green Infrastructure Assessment 2021 Extract)

GI Theme	GI Function
Health and well-being	Recreation Active travel Trapping air pollutants
Biodiversity and ecosystem resilience	Pollination Habitat for wildlife Corridor for wildlife
Climate change, sustainability and decarbonisation	Shading from the sun Soil stabilisation Carbon Storage Water storage and conveyance Coastal protection Pollutant removal
Social cohesion	Community space Local food production
Economy	Providing jobs Lifelong learning Skills and volunteering
Sense of place	Visual contribution to landscape Connection to local environment Noise absorption Heritage and culture

Bridgend Supplementary Planning Guidance

A series of supplementary planning guidance documents exist to be read in conjunction with LDP Policies, setting out a vision for the planning of an area, and showing the principles that should be followed in its development.

This guidance does not have full statutory status under the Town and Country Planning Act. However, it has 'material consideration' when determining planning applications and appeals within the relevant topic/land-use area and will be afforded 'substantial weight'.

The following SPG's are of relevance to the GI framework of the proposals:

- SPG 7 – Trees and Development (2008)
- SPG 19 – Biodiversity and Development (2014)

Particular relevance is given to section A of SPG 19 "A Green Infrastructure Approach" which states that all developments can contribute to green infrastructure by improving existing resources or by improving local provision.

	The scale and cost of green infrastructure delivered should reflect the scale and type of development proposed and the nature of and adverse effects on the natural environment. Small schemes such as a single house development could contribute by providing an adequately sized garden, nest boxes for birds and bats, or a green roof. Mid to high density housing schemes could include the provision of food growing areas and other green space for healthy recreation. The location of the development will also determine the extent of green infrastructure which the Council would expect to see as part of a proposed development. Major developments proposed within residential areas which are currently deficient in accessible open space will be expected to provide a greater quantity of open space than those in rural areas where green infrastructure functions are already being achieved.
Existing Green Infrastructure	
Existing Assets	Desktop studies and field surveys have been carried out to confirm the green infrastructure features at the site and its surrounding context. The elements that are considered to form the existing Green Infrastructure of the site and surrounding context are: • Existing Amenity Grassland • Existing Trees (9no. of value, with the remainder as category U status) • Existing Hedgerows • Semi-natural broadleaved woodland to the immediate west of the site • Extensive overgrown scrub • Overgrown Rhododendron (identified as invasive, and therefore removal beneficial to site GI) • Presence of slow worms and associated reptile habitat • Potential habitat for nesting birds The green infrastructure elements are described briefly below, identifying and assessing existing or potentially important elements. It summarises the Stepwise approach Step A - Identify and Assess. <u>Ecology</u> A suitable Preliminary Ecology Appraisal and follow up Phase 1 Habitat Survey for reptiles accompanies this Planning Application. The habitats identified on the site have been noted above. The site is a disused brownfield site, but was formerly occupied by a number of buildings associated with the workings of the Ffaldau Colliery. Most of the site consists of early successional overgrown scrub with hardstanding and fragmented areas of coarse grassland. The steep-sloping area of semi-natural broadleaved woodland to the immediate west of the site, as well as the area of marshy grassland to the south, are possibly Section 7 habitats. These habitats are more ecologically valuable than any of the on-site habitats and represent a more important constraint to development because of their sensitivity to indirect impacts. The site is considered to have some ecological value; however, appropriate measures have been recommended to help preserve as much of its ecological value as possible. All reptile species are protected under British Legislation, in particular the Wildlife and Countryside Act 1981 (as amended).

Trees

A Tree Survey and Constraints Plan has informed the site layout taking into account trees of value along with associated root protection zones. There are a group of trees in the north eastern corner of the site, immediately adjacent to the existing vehicular entrance to the site which are the subject of a Group Tree Preservation Order. The TPO was issued in 1998 and the report states that the trees (Group A1) are: 'Consisting mainly of Ash, Birch, Elder, Apple, Willow, Hawthorn, Oak and Cherry.'

The Tree Survey undertaken shows that the health of a number of the trees within the group TPO has declined over the past few decades. The report recommends the removal of some of these trees, which are suffering Ash Dieback and decay. The removal of some of these trees would enable the widening of the access.

The trees of quality within this portion of the site will be retained, including the category 'A' Oak (T17).

Fig.3 Tree Constraints Plan (Treescene)

Landscape

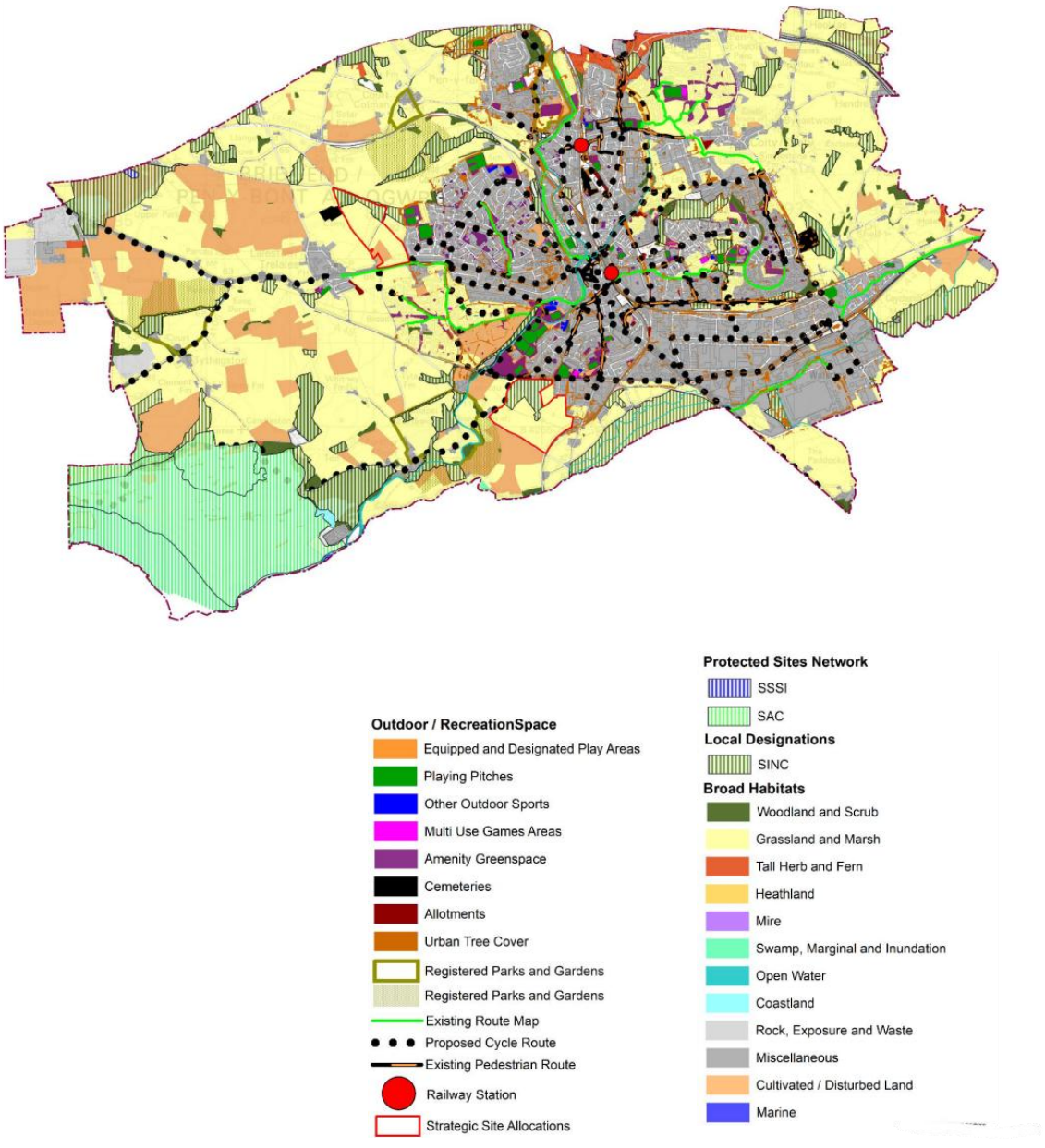
The site is currently brownfield and limited in value of landscape characteristics. The development represents an opportunity to provide a betterment in this regard.

Some of the mature trees in the north-east corner provide some landscape value to the site, although ash represents most of the larger and more mature specimens and these therefore have limited lifespans. Although not representing any significant ecological constraints, retaining some of these trees for landscape purposes is advantageous.

GI Connectivity

The site is very well connected to the existing GI network as demonstrated within the Green Infrastructure Assessment (2021) map, prepared as an evidence base for the recently adopted LDP.

Fig.4 GI Connectivity Map (Bridgend Green Infrastructure Assessment 2021 Extract)



Assessment	
Green Infrastructure Enhancement& Mitigation	Having regard to local and national Planning Policy, a stepwise approach has been utilised with the proposals for the Site, in a proportionate manner to the size, scope and context of providing a residential development of 21 dwellings as per guidance located in PPW Edition 12 Chapter 6 Step A has been undertaken within the earlier section of this document. Step B, is to avoid GI loss wherever reasonable. In order to respond and mitigate losses, Step C guides developers to respond and design accordingly, in order to achieve a net betterment in regards to green infrastructure and biodiversity value of a particular site. Where possible, existing assets will be retained, combined with new planting, landscape and biodiversity proposals for the site. The following enhancement and mitigation measures are to be implemented through the delivery of the development to result in a net betterment of GI site wide, additionally complimenting the adjacent sensitive woodland area. In regards to compensation for tree loss, the submitted indicative layout Rev D shows the portion of the site adjacent to the protected trees to be used as Public Open Space, with dwellings further to the south constructed outside of the RPAs of these trees. The trees which would require removal in order to improve the safety of the existing vehicular access into the site would be compensated through new tree planting throughout the development, as illustrated on the indicative proposed site plan. The site is capable of being developed whist maintaining a 5 metres gap between development and the boundary wall along Victoria Street and a reptile grassland mitigation area, which runs adjacent to the southern and western boundaries and extends to no less than 450 square metres. This would represent a 1:1 compensation ration for the extent of suitable basking habitat present on site during baseline conditions. This will be continuous with the adjacent area of marshy grassland to the south. This is proposed to extend along the western boundary of the site as a linear strip, down into a patch of habitat to the south. A suite of ten bird boxes are to be installed within the new buildings, wherever possible these are to be integral to the structure to the house, rather than attached to the side, in order to ensure longevity and decrease householder opposition. However, this is not possible for all of the styles proposed by the LPA as being of particular importance to the area. Four double house martin cups are to be installed in suitable locations along the apex of gables. Further to the provision for birds, bats are also accommodated within the new properties. Bat bricks or bat boxes are to be incorporated into the new dwellings. Boundaries across the site will also be kept permeable for terrestrial wildlife. This will be achieved by providing a continuous gap of a minimum of 100mm at the base of all fences. The steep-sloping area of semi-natural broadleaved woodland to the immediate west of the site, as well as the area of marshy grassland to the south, will be safeguarded from adverse impacts during site clearance and construction. Depending on the final layout and further reserved matters application consideration, further detailed management will be drawn up through a suitable CEMP. Identified invasive species will also be removed and remediated, allowing valuable plant species to flourish.

	In regard to light spill, it is proposed that the wall along the eastern boundary will be retained, protected and safeguarded throughout the construction and operation phases of a future development, therefore further survey work for bats is not considered necessary. A suitable drainage solution will be agreed by the SAB Authority and implemented in accordance to current standards. The NRW Development Advice Map identifies the site as being adjacent to but outside of a Flood Zone C2 area and on land which is known to have previously flooded. The site broadly slopes from a high point in the east down to the west. The site is of a size that the proposed development can be accommodated whilst maintaining adequate areas for sustainable drainage solutions ensuring no increase in risk of flooding. It has furthermore been confirmed by Natural Resources Wales that despite the brownfield nature of the site, the controlled waters at this site are not of the highest environmental sensitivity, concluding that detailed site-specific advice or comments with regards to land contamination issues for this site were unnecessary. As demonstrated earlier in this document, the site is well connected to a broader network of GI assets, accessible by foot and bike. According to the GI Connectivity Map (Bridgend Green Infrastructure Assessment 2021), the site is situated within a highly connected area, rich in open spaces, blue corridors and green areas. Therefore, the biodiversity features planned for the site will positively enhance its current setting.
Conclusion	
	The existing green infrastructure features on the site have been retained where possible, and where loss has been unavoidable, new GI features have been proposed on the site in the form of enhancement and mitigation measures, which forms the overall green infrastructure framework for the plot. The existing site and surrounding have been assessed and the ecological value of the parcel of land has been duly considered. Although the introduction of residential development will generate some GI loss and indirect impact, it is concluded that the biodiversity enhancements and robust mitigation against harm to reptile species, along with adjacent woodland areas comprise a suitable result of the step wise approach. It is therefore argued that given the scope of the proposals and the size of the development site, the development successfully meets the aims and objectives of Planning Policy Wales and the Bridgend County Borough Council Local Development Plan in regard to protection and enhancement of Green Infrastructure.