

# Green Infrastructure Statement

Land to the rear of The Vicarage, Llanarth, Ceredigion,  
SA47 0NZ

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1. Introduction	
Overview & Legislative Requirement	<p>This Green Infrastructure Statement has been prepared to accompany and support a planning application for residential development (Use Class C3), comprising a total of up to 17 no. dwellings.</p> <p>Planning Policy Wales (PPW) (Edition 12, February 2024) requires that all planning applications are accompanied by a Green Infrastructure Statement that is proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal.</p>
Purpose & Statement Structure	<p>The purpose of this statement is to provide an overview of the existing habitats on the site and their condition; potential development impacts (in absence of mitigation) and proposed biodiversity enhancements. The remainder of the statement is, therefore, structured as follows:</p> <ul style="list-style-type: none"> <li>▪ <b>Section 2</b> provides an explanation of the context of the application including site details, a description of the proposals and ecological baseline;</li> <li>▪ <b>Section 3</b> sets out the policy context relevant to the proposals;</li> <li>▪ <b>Section 4</b> justifies the extent of green infrastructure proposed; and</li> <li>▪ <b>Section 5</b> provides an overview and concludes this statement.</li> </ul>
2. The Site & Proposals	
Site Context	<p>The application site comprises an area of approximately 0.8 hectares and consists of grassland, defined by hedge-banks interspersed with some trees. Adjacent to the eastern boundary is an unnamed lane and further to the north, east and south are residential properties within the village of Llanarth.</p> <p>The character of the area is largely residential, comprising a range of dwelling types and architectural styles.</p> <p>The extent and location of the site is shown on the adjacent site location plan.</p>  <p style="text-align: right;"><i>Figure 1: Site Location Plan</i></p>
The Proposals	<p>The proposed development incorporates the erection of 17 no. residential dwellings including 4 x one bedroom bungalows, 10 x two bedroom houses and 3 x three bedroom houses, together with associated works.</p>
Ecological Baseline	<p>The site itself is not subject to any statutory or non-statutory ecological designation. Nevertheless, it is greenfield and its peripheries are vegetated. As such, a Preliminary Ecological Appraisal (PEA) was undertaken by I&amp;G Ecological to consider the site's ecological conditions, the ecological context, provide an appraisal of its ecological value and whether secondary survey work will be required.</p>

	<p>The site is situated on an open sunny south facing slope and the majority of the area is well drained. Semi-improved neutral grassland is the main component and is becoming rank and tussocky in the absence of grazing. Scrub is invading from the edges. To the north and west this is predominantly bramble, with small areas of grey willow. To the southeast there is a thick band of dense gorse fronting the hedgerow which is becoming colonised along the outer edge by bramble and grey willow. The partial hedgerow to the north and the hedgerow to the south are composed of leylandii conifers. This habitat contains notably low species diversity but may provide cover habitat to wildlife using the site.</p> <p>The site's native boundary hedgerows/tree-lines were considered to have the highest habitat value – these are proposed to be retained. Whilst the boundary hedgerow to the east had become very gappy and outgrown – this is proposed to be translocated or replaced further into the site to accommodate the layby and highway improvement works. Hedgerow management is proposed to account for the loss of short sections at the access mouth and create a sufficient visibility splay. The scrub, hedgerows and tree-lines were considered to act as flight lines for bats. Therefore, an appropriate lighting plan was recommended. Whilst some trees had features suitable for supporting roosting bats, it was advised that any mature trees which require felling or management in order to accommodate the development would need to be subject to inspection and assessment for suitability for use by bats. Since it is not proposed to fell any trees, secondary survey work is not required. No incidental evidence of reptiles was identified during the site survey, however, a method statement and mitigation plan is recommended in order to protect reptiles and amphibians during site clearance and construction.</p>
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### 3. Planning Policy Context

Future Wales (The National Plan)	<p>Future Wales – The National Plan 2040 (February 2021) sets the direction for development across Wales to 2040. It constitutes a national development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, and improving the health and well-being of communities. Decarbonisation, health, prosperity and the Welsh language are common threads underpinning all Future Wales policies.</p> <p>Policy 9 (Resilient Ecological Networks and Green Infrastructure) seeks to ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure as part of development proposals. The policy states “...the Welsh Government will work with key partners to:</p> <ul style="list-style-type: none"> <li>▪ <i>identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and</i></li> <li>▪ <i>identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.</i></li> </ul> <p><i>Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. 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.”</i></p>
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National Planning Policy	<p>The Welsh Government issued an update to Chapter 6 of PPW on 11 October 2023 covering green infrastructure, net benefit for biodiversity, the protection afforded to Sites of Special Scientific Interest and trees and woodlands. These changes were published in an annex to Chapter 6 and have been included in a consolidated version of PPW (Edition 12).</p> <p>Planning Policy Wales 12 sets out a range of policies to maintain and enhance biodiversity, promote the resilience of ecosystems, including the stepwise approach, and to maximise the provision of green infrastructure.</p> <p>Paragraph 6.2.12 of PPW states that a Green Infrastructure Statement is 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 PPW) has been applied.</p> <p><b>Step 1 (Avoid)</b> – The primary focus of planning authorities is to prevent harm to biodiversity and ecosystem functioning by considering a wide range of species and habitats. They must ensure that any potential environmental damage is minimised by thoroughly evaluating alternative sites and design options that would cause less harm or provide benefits.</p> <p><b>Step 2 (Minimise)</b> – When all possible options for avoiding harm to biodiversity have been explored, applicants must collaborate with planning authorities to minimise the initial impact on biodiversity and ecosystems.</p> <p><b>Step 3 (Mitigate)</b> – When efforts to minimise the impact on biodiversity and ecosystems have been exhausted and there's still potential for damage or loss, the proposed development must include mitigation measures. These measures should limit the negative effects of the development by repairing damaged habitats and species disturbances, aiming to restore beyond a like-for-like level considering disturbance and recovery time. The goal is to enhance ecosystem resilience both on the site and, where feasible, in the surrounding area.</p> <p><b>Step 4 (Compensation)</b> – When all the steps above have been exhausted, and where modifications, alternative sites, conditions or obligations are not sufficient to secure biodiversity outcomes further on-site/immediately proximate, as a last resort off-site compensation for unavoidable damage must be provided.</p>
The Well-being of Future Generations Act (2015)	<p>The Well-being of Future Generations Act (2015) aims to promote the well-being of both current and future generations. It represents a shift towards a more sustainable and long-term approach to governance, focusing on economic, social, environmental, and cultural well-being.</p> <p>The Act requires public bodies in Wales to consider the impact of their decisions on these well-being goals and to work towards achieving them. It establishes a set of well-being objectives, such as a prosperous Wales, a resilient Wales, a healthier Wales, a more equal Wales, a Wales of cohesive communities, and a Wales of vibrant culture and thriving Welsh language.</p> <p>The Act encourages collaboration between public bodies, communities, and stakeholders to ensure effective green infrastructure provision. This collaborative approach fosters innovation, knowledge sharing, and community engagement in designing and implementing green projects that benefit both current and future generations.</p>
Environment Wales Act (2016)	<p>This legislation is intended to work alongside the Well-being of Future Generations Act. It includes a new biodiversity duty to reverse the decline of biodiversity and to secure long-term resilience. Section 6 states <i>"A public authority must seek to maintain and enhance biodiversity... and in so doing promote the resilience of ecosystems"</i>.</p> <p>In relation to resilience of ecosystems, the following should be taken into account:</p> <ul style="list-style-type: none"> <li>a) diversity between and within ecosystems;</li> </ul>

	<ul style="list-style-type: none"> <li>b) the connections between and within ecosystems;</li> <li>c) the scale of ecosystems;</li> <li>d) the condition of ecosystems (including their structure and functioning);</li> <li>e) the adaptability of ecosystems.</li> </ul>
Active Travel (Wales) Act (2015)	<p>The Active Travel (Wales) Act (2015) set out that Welsh ministers must publish annual reports on the amount of active travel journeys made in Wales. There is also a requirement for Local Authorities to identify and plan for active travel routes and increase the provision for walking and cycling, and encourage users to rely less on cars. Local highway authorities are required to give greater consideration to the requirements of walkers and cyclists and provide greater infrastructure provision to them. The act also highlights the need to build connections between key sites such as workplaces, hospitals, schools and shopping areas with active travel routes.</p>

#### 4. Green Infrastructure Strategy

Existing Assets	<p>The Applicant acknowledges that Section 6 of the Environment (Wales) Act 2016 sets out that planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions and, in so doing, promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions. This means the proposed development should not cause any significant loss of habitats or populations of species, locally or nationally and ideally should provide a net benefit for biodiversity.</p> <p>The statement was informed by a desk based study and an extended Phase 1 Habitat Survey to confirm the exiting green infrastructure elements on the site and in the surrounding area.</p> <p><u>Ecology</u></p> <p>A suitable Preliminary Ecology Appraisal (PEA) and follow up Phase 1 Habitat Survey accompanies this planning application. The delivery of the development will ensure that it is in compliance with the ecological standards and protection measures set out in this document. Most of the site consists of dense scrub that is invading from the edges with semi-improved neutral grassland being the most dominant habitat on site.</p> <p>In accordance with the recommendations of the PEA, the Applicant will prepare a Reptile and Amphibian Method Statement and Mitigation Plan and a Sensitive Lighting Strategy. The application is also accompanied by a Landscape Strategy and Planting Plan, proposing suitable planting to support the identified B-line.</p> <p><u>Trees</u></p> <p>The peripheries of the site are marked by hedgerows with some trees interspersed within, although none of these are protected by Tree Preservation Orders. Accordingly, the planning application is supported by a Tree/Hedgerow Survey and Constraints Plan. This surveyed a total of 1 no. individual tree and 3 no. tree groups. Of the individual trees, 1 no. was assessed as Category C (Low Quality and value). Of the tree groups, G1 and G3 were assessed as Category C (Low Quality and value). G2 was assessed as Category B (Moderate Quality and Value). The survey and assessment conclude there were no trees of particular note on site.</p> <p>An Arboricultural Method Statement &amp; Arboricultural Impact Assessment have also been prepared to support the proposals. This document concludes there are no areas of conflict between the existing trees and development proposals. Nevertheless, tree protection measures are proposed to avoid harm to roots and crowns of the trees/hedgerows during construction.</p> <p>In order to accommodate highway widening work and enable the provision of a parking layby on the road, the existing hedgerow lining the site's eastern boundary (H1) will need to be</p>
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	<p>translocated within the site. A new hedge, to include translocated hedge plants reinforced with Hawthorn, Hazel, Holly, Blackthorn and Alder Buckthorn, will be planted along this boundary. This hedgerow will be stone-pitched at the site entrance and pedestrian entrance.</p> <p><u>Drainage</u></p> <p>The site is crossed by a public sewer, which is located in the southern portion of the site. This sewer requires a 6m easement, which has been accommodated. Foul water from the proposed development will be discharged to the public sewerage system.</p> <p>The proposals will involve construction work with a gross floorspace exceeding 100 sqm. As such, Sustainable Drainage Systems (SuDS) are proposed to manage on-site surface water. A detention basin is proposed in the southern portion of the site to accept surface water. This will be fitted with a flow control device connecting to cellular storage attenuation tank with a storm overflow outlet to the south.</p> <p>Rainwater butts will be provided for all properties for rainwater reuse. Driveways will have permeable paving and there will be on plot raingardens taking overland flows from rainwater pipes.</p>
Mitigation Measures	<p>In alignment with local and national planning policy, a stepwise approach has been utilised for the proposals, proportionate to the size and scope of the application.</p> <p>Step A has been addressed in the earlier sections of this document, identifying existing Green Infrastructure (GI) assets.</p> <p>Step B's objective is to avoid GI loss wherever feasible.</p> <p>Step C involves designing and responding to any unavoidable losses to achieve a net improvement in the GI and biodiversity value of the site.</p> <p>Where possible, existing assets will be retained, combined with new planting, landscape and biodiversity proposals for the site. It is proposed that the following enhancements are made to improve the value of the site for biodiversity and result in a net betterment of green infrastructure site wide.</p> <ul style="list-style-type: none"> <li>• A sensitive lighting scheme will be designed to minimise any light pollution that may otherwise impact nocturnal wildlife within the area.</li> <li>• An area of open space, incorporating a surface water attenuation basin and damp area/ephemeral pond, has been set aside to the south of the site. This will be managed to establish a species rich native wildflower meadow. The surface will be retained or translocated semi-improved neutral grassland, enriched with some wildflower turf and bulbs. The grassland will be managed to maximise its biodiversity value ('hay meadow' type mowing regime).</li> <li>• The central area of public open 'green' space will be a low maintenance, high biodiversity value amenity space.</li> <li>• Two Oak trees are proposed in the centre of the development, with a native hedge along the eastern margin of the green, extending along the boundary with the house and around the retaining wall at the south. Smaller-growing fruiting trees will also be planted in this central amenity area and in a separate, small marginal area at the western arm of the hammerhead.</li> <li>• There is a small ephemeral pond at the southwestern corner of the site. This feature is close to the existing ditch and the proposed discharge from the site drainage is very close. There is a small area to the north of this pond and to the east of the ditch that could be regraded to encourage some temporary damp ground conditions and thereby increase its biodiversity potential.</li> </ul>



	<ul style="list-style-type: none"> <li>• A hibernaculum is proposed close to the pond at the southwestern corner of the site.</li> <li>• A new hedgerow will be planted along the hedgebank on the site's eastern boundary. This will be stone-pitched at the main site entrance and the pedestrian entrance at the lay-by (using stone material arising from the site clearance where possible).</li> <li>• A method statement and mitigation plan will be prepared in order to protect reptiles and amphibians during site clearance and construction.</li> <li>• Artificial habitats will be incorporated into the buildings including bee bricks, swift bricks or swallow cups and bat boxes. These structures are designed to provide areas for wildlife to breed and allow the continuation of biodiversity corridors.</li> <li>• The Berberis and buddleja within the eastern hedgerow will be removed and disposed of appropriately. Materials brought into the site should be clean and free from INNS.</li> </ul>
Precautionary Measures	<ul style="list-style-type: none"> <li>• Any security fencing erected on site will be made permeable to wildlife movement.</li> <li>• Spoil-proof fencing will be used to protect mammals from accessing construction materials.</li> <li>• Fencing off and covering of open excavations, in order to prevent animals becoming trapped or injured. Ramp-like structures should be installed to allow any animals that may become trapped to leave the groundworks.</li> <li>• Access routes and machines will be chosen with the minimisation of sediment run-off as a priority.</li> <li>• Brash piles will be removed by hand to ensure no harm is caused to wildlife using the features at the time for the works.</li> <li>• All vegetation clearance required to fulfil the proposed design should be undertaken from September to February to avoid bird nesting season.</li> <li>• Tree protection measures will be installed in accordance with the Tree Protection Plan.</li> </ul>
<b>5. Summary</b>	
	<p>This Green Infrastructure Statement has been prepared to accompany and support a planning application for the erection of 17 no. residential dwellings on an allocation housing site in Llanarth.</p> <p>The proposals include opportunities for green infrastructure measures that are appropriate to the site in question, proportionate to the development proposed and have been identified in accordance with Planning Policy Wales's step wise approach (outlined at Paragraph 6.4.15 of Planning Policy Wales).</p>