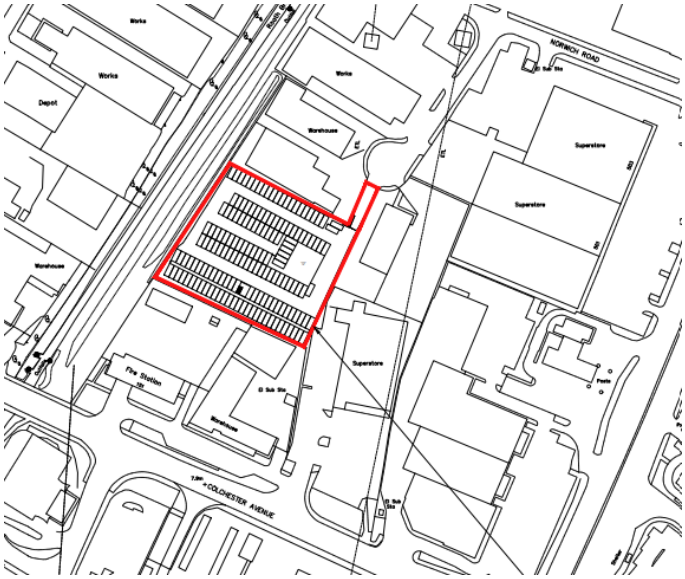
Green Infrastructure Statement

Norwich Road, Cardiff, CF23 9AB

February 2025

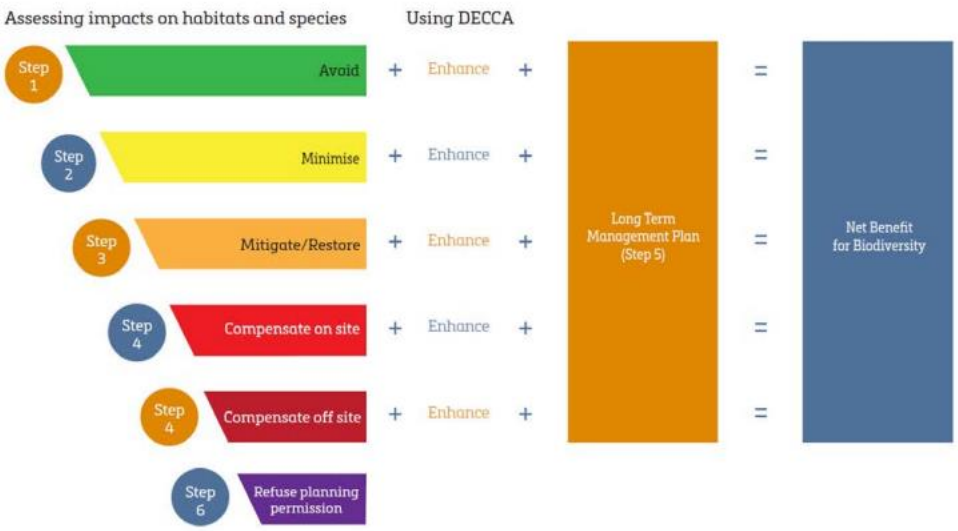
amity

planning consultants

Introduction	
Client	This statement has been prepared on behalf of Pink Storage.
Scope	This Green Infrastructure Statement accompanies a Full Planning Application for the retrospective use of land off of Norwich Road, Cardiff, as a self-storage facility together with the sitting of shipping containers and associated infrastructure.
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 and architectural plans.
Site Details	
Site Address	Norwich Road, Cardiff, CF23 9AB
Site Location	*Fig.1 Site Location Plan* 
Site Description	The Pink Storage facility is located in a predominately industrialised area of Roath, situated within Cardiff's settlement boundary. Prior to its use by Pink Storage the site had remained undeveloped for in excess of 20 years, and only used during this period for car parking. The site is of a broadly square form, accessed via a combined pedestrian and vehicular access from Norwich Road to the north. The current use of the site as a self-storage facility by Pink Storage began in 2023. The site now houses 227 individual shipping containers that serve as self-storage units. Many of these are free-standing, however at the southern-end of the site are a run of stacked containers (two containers tall), and associated gangways. The site is enclosed by palisade fencing on each boundary, with a secured coded mesh gate that acts as an entrance to the site. The site is well positioned in relation to public transport, highway

	access and major road networks. Norwich Road connects directly with Newport Road, which provides cycling, pedestrian, public transport and road connections.
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: 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	
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: […] iv. Biodiversity interests including designated sites and the connectivity of priority habitats and species (EN5, EN6 and EN7); v. Trees (including street trees), woodlands and hedgerows (EN8); vi. Strategic recreational routes, cycleways, and the public rights of way network (T5, T6 and T8); vii. Parks, playing fields, green play areas and open spaces (C4 and C5); and viii. Growing spaces including allotments, community orchards and larger gardens; and ix. 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: <u>Cardiff Green Infrastructure SPG (2017)</u> 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: - Existing shrubs/trees on site boundaries The green infrastructure elements are described briefly below, identifying and accessing existing or potentially important elements. It summaries the Stepwise approach Step A – Identify and Access. <u>Drainage</u> The site will be subject to Sustainable Drainage requirements as part of a separate SABs application which will be submitted in due course. <u>Trees</u> No tree survey is required for the site, due to the development site being entirely hard standing, with all existing trees situated outside the site boundary. Small bushes and trees line the eastern, southern and western boundaries. The collection of shrubs and bushes that line these boundaries, were retained and safeguarded as part of the construction process of the shipping containers. <u>Ecology</u> No ecology surveys are required for the site, given that no retaining ecological value remains on site. The application relates to a use of land together with operational development comprising of the siting of storage units. <u>Landscape</u> Due to the sites irregular shape and lack of landscape features, the site holds little landscape and amenity value. By planting will be incorporated in the front vicinity of containers numbered 116/119.
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".

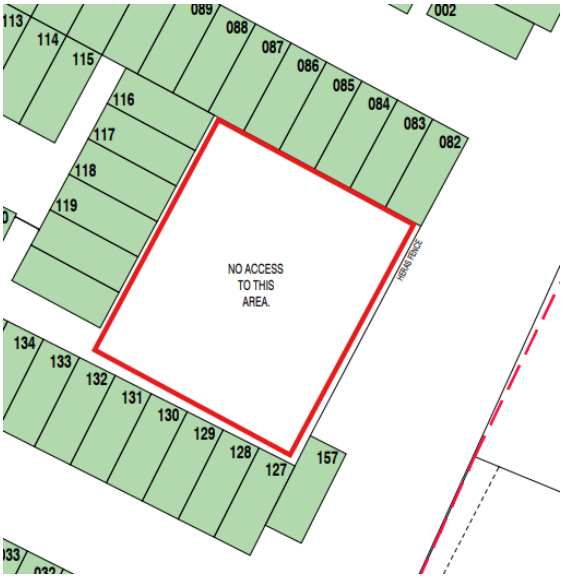
Step A has been addressed in the earlier sections of this document, identifying existing Green Infrastructure (GI) assets.

Step B's objective is to avoid GI loss wherever feasible. Given the lack of features on the site and lack of physical works to the ground, there is no proposed loss of any identified GI assets.

Step C involves designing and responding to any unavoidable losses to achieve a net improvement in the GI and biodiversity value of the site.

The development site has been surfaced in hard standing, mainly tarmacadam and topped with gravel, with no ecological habitat present on site. Historic photographs evidence that there have been some historic changes in habitat on-site. However, given the most recent use of the site for vehicle parking before the installation of the shipping containers, it is unlikely that the site would have been of any ecological/landscape value. This use would have likely tampered with and damaged any potential green infrastructure the site may have held diminishing any potential value before the site's usage by Pink Storage. By way of enhancement, the section of 'no access to this area' next to containers no.116/119 will be cleared, soiled and replanted with wildflower seeds to allow for natural rejuvenation. Due to its hard-standing, potted plants will also be incorporated in exchange for any losses created by the shipping units and the as laid foundation.

Fig 4 Regeneration Zone



Additionally, Schwegler bird and bat boxes will be incorporated at the end of shipping unit runs to ensure the continuation of biodiversity and encourage wildlife in areas that consist of fragmented green corridors. It gives the ability for habitats to thrive in urbanised areas that consist mainly of industrialised units.

Figure 5 Schwegler Bird and Bat Box Installation

Due to the site requiring no on site staff it diminishes the need for any extensive introduction of green infrastructure measures on site. Current operations on site such as waste management and emission regulations have provided a more direct approach to environmental stewardship than that introduced by vast amounts of green infrastructure.

Conclusion

The scheme has enabled full utilisation of the site area, mitigating enhancement measures that will help sustain local wildlife by providing habitats and maintaining green corridors in a predominately industrialised area. The incorporation of re-planting on the above scheme will help safeguard the remaining green infrastructure in these industrial areas.

It is therefore concluded that, given the nature and location of existing green infrastructure assets and scope of the application, the development successfully meets the aims and objectives of Planning Policy Wales and the Cardiff Local Development Plan in respect of protection and enhancement of Green Infrastructure.