

Green Infrastructure Statement

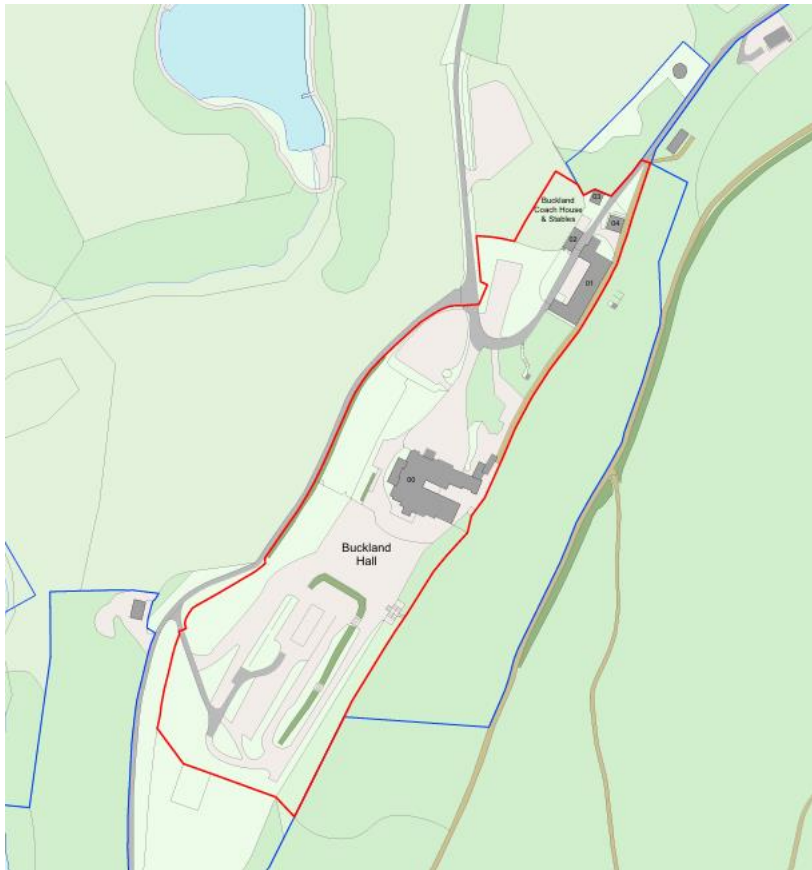
Buckland Hall, Bwlch

November 2024

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planning consultants

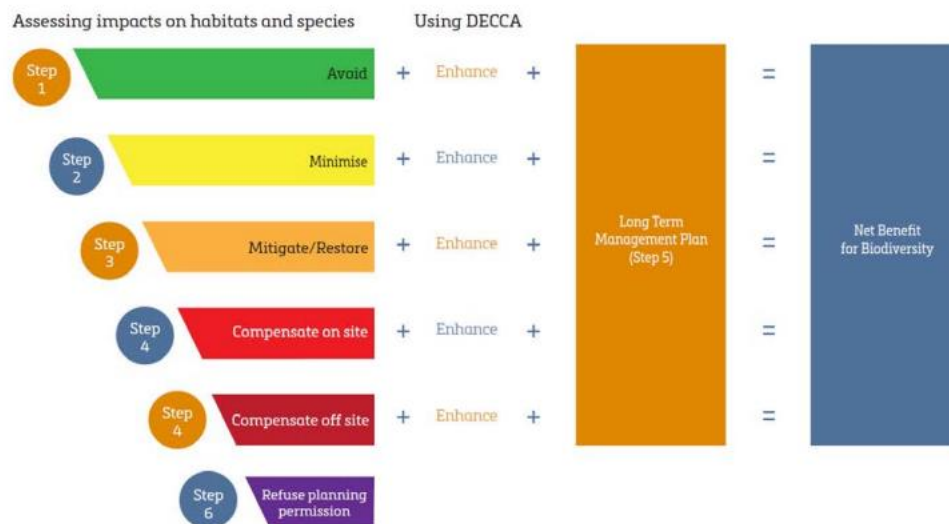


| Introduction | |
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| Client | This statement has been prepared on behalf of Robin Flimer-Wilson. |
| Proposed Development | This statement accompanies a full planning application for the change of use of this country house from a Hari-Krishna retreat/ occasional hotel and wedding venue (Class C1) to a residential dwelling (Class C5). The proposed development is for change of use only, and does not involve any physical works or any loss of green infrastructure. It should be read in conjunction with the site location plan. |
| 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. |
| Site Details | |
| Site Address | Buckland Hall, Bwlch, Brecon LD3 7JJ |
| Site Location | <p><i>Fig.1 Site Location</i></p>  |
| Site Description | Buckland Hall, located on the outskirts of Bwlch is a Grade II Listed Victorian mansion house with outbuildings set within a Grade II Listed park and gardens. The house is situated in a rural area overlooking the Usk valley within the Brecon Beacons National Park. In addition to the listed Hall, the surrounding estate covers 4.56 Hectares and includes numerous buildings, the majority of which are listed in their own right. |

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| | <p>The current house was built in 1898 and is sited in open countryside between Brecon and Crickhowell. The Hall faces west and south, looking over the River Usk, Tor y Foel to the south-west, and Brecon. The Hall is the centre of a linear historic estate, accessed via a driveway approximately 2km long, running south from the A40. This drive descends down the steep hillside off the A40 opposite Talybryn Lodge. The site is bounded to the north by the A40, to the west by the River Usk and on the east by the forestry plantations of Buckland Hill. The formal gardens lie to the south of the house on a series of terraces which descend the hillside to the west.</p> <p>The immediate area defined by the red line plan takes in the Hall, Coach House and associated buildings, tennis courts, and formal gardens.</p> |
| National Planning Policy | |
| Planning Policy Wales (Edition 12 2024) | <p>Planning Policy Wales (Edition 12) - February 2024</p> <p>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.</p> <p>Section 6.2 sets out green infrastructure should be given early consideration in development proposals and how it should be integrated into developments.</p> <p>“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.”</p> <p>“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”</p> <p>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”</p> <p>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.</p> <p>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.</p> <p>The Step Wise approach has been summarised below:</p> <p>1. Avoid</p> |

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.

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| | <p><u>Compensate</u></p> <p>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.</p> |
| Future Wales: The National Plan | <p>Future Wales – The National Plan</p> <p>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.</p> <p><i>Fig.3 The seven well-being goals from Well-being of Future Generations (Wales) Act, 2015</i></p> <div></div> <p>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)..”</p> <p>“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.”</p> <p>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.”</p> <p>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.</p> |
| Environment Wales Act (2016) | <p>Environment (Wales) Act 2016</p> <p>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”.</p> <p>In relation to resilience of ecosystems, the following should be taken into account:</p> <p>a) diversity between and within ecosystems;</p> |

- 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

Brecon Beacons
National Park
Authority Local
Development
Plan 2007-2022

Brecon Beacons National Park Authority Local Development Plan 2007-2022

The following relevant criteria of the Local Development Plan policies have been identified:

SP3 Environmental Protection - Strategic Policy

All proposals for development or change of use of land or buildings in the National Park must demonstrate that the proposed development does not have an unacceptable impact on, nor detract from, or prevent the enjoyment of;

- a) the special qualities of the National Park as identified in the National Park Management Plan.
- b) ecology and biodiversity assets both within and beyond designated sites (see Policies 6, 7 and 8)
- c) the water environment (see Policy 11)
- d) geodiversity, including the Fforest Fawr European Geopark
- e) cultural and historic heritage, including Blaenavon Industrial Landscape World Heritage Site, Registered Historic Parks Gardens and Historic Landscapes, (see Conserving the Historic Environment below)
- f) the character of the built heritage, including listed buildings, conservation areas and archaeological features (see Conserving the Historic Environment Below).
- g) the important network of public open space and recreation facilities (See also SP15 and supporting detailed policies).
- h) soil and air quality (see Policy 13 and 14).
- i) Agricultural Land of Grade 1,2,3a

Policy 4 Sites of National Importance

Proposals for development which may affect a National Nature Reserve or proposed or notified Site of Special Scientific Interest will only be permitted where:

- i. the proposal contributes to the protection, enhancement or positive management of the site; or
- ii. the developer proves to the satisfaction of the NPA that the proposal has no unacceptable impacts which would directly or indirectly damage the site, detrimentally affect its conservation interest or its value in terms of its designation; or
- iii. the need and reasons for the proposed development outweigh the value of the site itself; and there are no alternative means of meeting the need for the development.

Policy 5 Sites of Importance for Nature Conservation

Development on non-statutory sites of wildlife, geological or geomorphological importance will only be permitted in certain circumstances.

Policy 6 Biodiversity and Development

This policy states that development will only be permitted where:

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| | <ol style="list-style-type: none"> 1. the developer proves to the satisfaction of the NPA that there is no unacceptable loss or fragmentation or other impact of a habitat or landscape feature and/or increased isolation on important species as listed under Section 42 of the NERC act (habitats and species of principal importance to Wales), OR 2. A) the developer identifies habitats and landscape features of importance for wildlife within the site and provides for the further creation, positive management, restoration, enhancement or compensation for these habitats and features to ensure that the site maintains its nature conservation importance; and B) full provision is made for the future management of the site's habitats and features of nature conservation value. This will be secured either through Planning Obligations or the imposition of Planning Conditions; and C) there is no unacceptable loss/breaching of linear features (e.g. hedgerows, woodland belts). <p>Policy 7 Protected and Important Wild Species</p> <p>Proposals on land or buildings that support protected or important species will only be permitted subject to certain criteria.</p> <p>Policy 8 Trees and Development</p> <p>Proposals for development on sites containing trees will be required to provide a Tree Survey and a Tree Protection Plan in support of the proposal.</p> <p>Policy 9 Ancient Woodland and Veteran Trees</p> <p>This policy states that development which affects ancient woodland may require necessary mitigation / compensation / enhancement measures.</p> |
| Biodiversity and Development Supplementary Planning Guidance September 2016 | <p>This SPG supplements the following policies:</p> <ul style="list-style-type: none"> • SP3 Environmental Protection • Policy 3 Sites of European Importance • Policy 4 Sites of National Importance • Policy 5 Sites of Importance for Nature Conservation • Policy 6 Biodiversity and Development • Policy 7 Protected and Important Wild Species • Policy 9 Ancient Woodland and Veteran Trees <p>The intention of the guidance is “to ensure that biodiversity and geodiversity issues are fully considered as well as protected and enhanced through the Development Management process”.</p> |
| Existing Green Infrastructure | |
| Existing Assets | <p>For context, the proposed change of use follows previous applications for physical works at the site, namely 20/18848/FUL (physical restoration works at the hall) The elements that are considered to form the existing Green Infrastructure of the site and surrounding context are:</p> <ul style="list-style-type: none"> • Buckland Coach House Site of Special Scientific Interest (SSSI), also part of the Usk Bat Sites Special Area of Conservation (SAC) • Ancient Woodland around the Coach House and Stables and to the east of Buckland Hall |

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| | <ul style="list-style-type: none"> • Grade 2 listed parkland and gardens • Existing Trees • Existing hedgerow • Existing shrubs <p>The following documents were submitted in support of application 20/18848/FUL:</p> <ul style="list-style-type: none"> • Bat Impact Assessment – Abbey Sanders Ecology - June 2020 • Tree Constraints Summary - The Tree and Woodland Company - July 2020 • Bat Survey and Impact Assessment – Abbey Sanders Ecology- August 2020 <p>These are attached as appendices. These provide more details of the green infrastructure on the site.</p> |
| Assessment | |
| Green Infrastructure Enhancement & Mitigation | <p>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.</p> <p>Step A: This step has been addressed in the earlier sections of this document, identifying existing Green Infrastructure (GI) assets.</p> <p>Step B: The objective is to avoid GI loss wherever feasible. The proposed development does not involve the loss of any identified GI assets.</p> <p>Step C: This step involves designing and responding to any unavoidable losses to achieve a net improvement in the GI and biodiversity value of the site.</p> <p>The proposed development is for change of use only. The physical alterations to the building to restore it to a house capable of domestic occupation have been carried out in line with previous planning applications. The physical works undertaken following the previous applications have involved considerable enhancement of existing green infrastructure.</p> <p>In view of the fact there will be no adverse impact on green infrastructure, Step B is not applicable, but enhancing the GI benefit remains essential to meet the aims and objectives of PPW Chapter 6, The Brecon Beacons National Park Authority Local Development Plan 2007-2022 and associated documents.</p> <p>The proposed use of Buckland Hall as a residential dwelling, as opposed to the current commercial use, represents a significant de-intensification of use. In addition, as part of the proposals, the applicant has committed to restoring and maintaining bat habitats in the Hall roof spaces, and in the Coach House. Without this investment in the fabric of the building, the quality of the bat roosts would inevitably deteriorate. Bat compensation works have already taken place in the Coach House building as part of the physical alterations made to the house to provide alternative roosting for a population of lesser horseshoe bats which were found in the Hall's cellar.</p> <p>The proposed change of use consequently represents a considerable betterment in green infrastructure terms across the whole site.</p> |
| Conclusion | |

The existing green infrastructure features on the site have been retained, with no proposed losses. The proposed use represents a de-intensification of use as compared to the previous commercial use, and so there will be a considerable betterment in terms of the impact on green infrastructure.

Given the nature of the proposals and the size of the development site, it is concluded that the development successfully meets the aims and objectives of Planning Policy Wales and the Brecon Beacons Development Plan concerning the protection and enhancement of Green Infrastructure.