



**42C Commercial Street
Newport, NP20 1LP**

**Green Infrastructure Statement and Net Biodiversity
Benefit Statement**

June 2025

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DOCUMENT CONTROL

42C Commercial Street, Newport, NP20 1LP Green Infrastructure Statement and Net Biodiversity Benefit Statement				
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1 Introduction

1.1 Green Infrastructure Statements

Planning Policy Wales defines green infrastructure as:

"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 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 networks¹."

The National Planning Policy Wales version 12 was published in February 2024 and states that a green infrastructure statement must now be submitted with all planning applications. It must describe how green infrastructure has been incorporated into the development proposals and to demonstrate the positive multifunctional outcomes appropriate to the site, showing how the stepwise approach (see Appendix 1) has been applied to prioritise avoidance, minimisation, and compensation of potential impacts.

1.2 Net Biodiversity Benefits (NBB)

In Wales, the concept of Net Biodiversity Benefits (NBB) is a planning policy framework that mandates development projects to enhance biodiversity rather than simply mitigate their impacts. Unlike the quantitative approach of Biodiversity Net Gain (BNG) in England, which requires a 10% increase in biodiversity based on specific metrics, Wales uses a more qualitative and site-specific evaluation focused on ecosystem resilience.

The Planning Policy Wales (PPW) outlines the principle of NBB. Developers must demonstrate that their projects leave ecosystems in a better state by enhancing biodiversity either on-site or, when necessary, off-site. This involves a step-wise approach:

- Avoiding harm to biodiversity where possible.
- Minimising impacts through careful design.
- Mitigating and restoring any residual impacts.
- Compensating only as a last resort, if on-site measures are insufficient.

¹https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/6565ccf1517d747aa68af45c/1701170419121/Briefing_Paper_BwN_and_Planning_Policy_in_Wales_v1.0.pdf

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Projects must also align with the DECCA framework, which evaluates biodiversity resilience based on Diversity, Extent, Condition, Connectivity, and overall resilience. Long-term management and ecological considerations are essential, and planning permission can be denied if NBB is not adequately addressed.

This policy not only ensures the development achieves net biodiversity benefit through the enhancement of biodiversity and protection of habitats on site, but also aims to promote sustainable development and ecological connectivity across Wales, contributing to national biodiversity goals.

1.3 Site Description and Ecological Context

The site is located at 42C Commercial Street, Newport, NP20 1LP within the boundary of Newport City Council (Ordnance Survey Grid Reference centered at: ST 312 878²). A Location Plan is provided in Plan 1.

The building proposed for development comprises a multi-storey commercial premise in the city of Newport. It is surrounded on all sides by commercial and residential premises, with several broad-leaved trees planted along the street. The building is located in central Newport and the wider landscape is therefore predominantly urban in all directions, with some amenity grassland and small clusters of trees present throughout the city. The River Usk is located 250m from the building at its closest point.

1.4 Proposed Development

The development proposals involve the internal conversion of the upper floors of a commercial building into four self-contained flats. External works are limited to window replacements, cleaning of the exterior walls, and repairs as necessary.

A planning application has been submitted under reference P/25/0120³.

² Latitude and Longitude: 51.585522 , -2.9942481 / what3words: counts.cuts.wasp

³ <https://licensing.newport.gov.uk/online-applications/simpleSearchResults.do?action=firstPage>

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2 Green Infrastructure

2.1 Existing Green Infrastructure

There is no existing green infrastructure within the boundary of the site. However, several broad-leaved trees are planted along Commercial Street, in close proximity to the north-eastern elevation of the property.

2.2 Green Infrastructure Removal

No green infrastructure will be removed from the site.

2.3 Green Infrastructure Proposed on Site

A proposed landscaping location plan is included within Plan 2.

Key elements of the proposed green infrastructure at the site include:

- 2 box planters;
- 1 insect box; and
- 1 bird box.

Box Planters

Green infrastructure will be incorporated into the development through the inclusion of two planters within the site, located in the small outdoor space to the rear of the property (Plan 2). Box planter details can be found in Appendix 2.

It is suggested that Planter 1 is planted with tree species that require minimal maintenance once established, for example hazel (*Corylus avellana*) and honey locust (*Gleditsia triacanthos*). Hazel is a fast-growing, nut-bearing native tree species that will be highly effective for carbon capture, and will provide valuable foraging resources, shelter and connectivity for wildlife. Additionally, honey locust is a non-native, drought- and pollution-tolerant tree species that can help support biodiversity in urban environments and under rising temperatures. Planter 2 should be planted with native flowering plants to provide foraging resources, shelter and connectivity for wildlife, and a valuable source of nectar for pollinators. Catmint (*Nepeta sp.*), common chamomile (*Chamaemelum nobile*), ox-eye daisy (*Leucanthemum vulgare*) and other species that are tolerant to dry soil would be particularly beneficial as they are expected to be resilient to long-term climatic changes. Alternatively, a list of suitable native and non-native species can be found in Appendix 3.

By including a planting scheme incorporating native species within the plans, the biodiversity and ecological resilience of the site will be significantly improved. The planters will offer greater nectar availability, increased habitat complexity, and improved foraging corridors for pollinators and birds, contributing to urban biodiversity and supporting wider green infrastructure networks.

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Insect and Bird Boxes

Insect House

To further enhance the ecological value of the site, an insect house will be installed above Planter 2 on the eastern wall elevation to provide refugia and overwintering habitat for beneficial invertebrates, such as solitary bees and ladybirds. Guidance for the installation of insect houses can be found in Appendix 4.

Bird Boxes

Additionally, a bird box will be installed on the eastern wall elevation adjacent to the insect hotel and Planter 2, offering nesting opportunities for local bird species. Due to the heavily urban location and lack of dense cover in the surrounding area, a house sparrow nest box is likely to be the most beneficial design for biodiversity enhancement. House sparrows are sociable birds and prefer to nest in colonies. Appendix 5 shows a typical house sparrow terrace nest box, along with guidance for installation, which allows up to three pairs of this threatened species to breed in proximity to each other.

These measures will contribute to urban biodiversity, providing a range of habitats that support invertebrates and birds within the site's limited green space.

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3 Building with Nature Standards Framework

The development has also met several of the green infrastructure standards as outlined in the Building with Nature Standards Framework⁴. The Building with Nature Standards Framework involves twelve Standards, arranged across four groups. There are six Core Standards and three themes, Wellbeing, Water and Wildlife, containing two Standards in each. The six Core Standards create a solid foundation for the delivery of high-quality green infrastructure through design, planning and development.

3.1 Core Standards

The core standards are detailed below: together with details of how they are being met on site.

Standard 1: Optimise Multifunctionality and Connectivity – The green infrastructure incorporated within the new development proposals optimises multifunctionality and connectivity within the boundary of the project and links with green infrastructure in the surrounding area, such as scattered trees and amenity grassland throughout the city. Although not continuous, the green infrastructure will contribute to existing ecological networks connecting small areas of habitat throughout the city.

Standard 2: Positively Responds to the Climate Emergency – The green infrastructure is designed to be climate resilient by incorporating mitigation and adaptations that respond to the impacts of climate change. This can be met within the development by the increased enhancement and planting of trees around the site which will help with natural carbon capture. This has been met by the inclusion of two tree species in planters on the hardstanding to the back of the property. Although it is not a native species, the inclusion of honey locust is particularly beneficial as a drought- and pollution-tolerant species, whereas the native hazel is fast-growing and does not take long to begin capturing carbon. Therefore, they are both vital for supporting biodiversity in times of challenging temperatures.

Standard 3: Maximises Environmental Net Gain – The green infrastructure is designed to actively mitigate any unavoidable harmful environmental impacts of development on soil and air quality and to minimise light and noise pollution. The development meets this by including trees in planters, which will provide shade and evapotranspiration to help reduce day-time temperatures.

Standard 4: Champions a Context-Driven Approach - Not considered relevant for this site. We are not aware of any stakeholder feedback informing the green infrastructure layout, features and design.

Standard 5: Creates Distinctive Places – The green infrastructure is integral to the project and is designed to reinforce local distinctiveness and/or create a distinctive sense of place. Currently, the site has very limited habitats and therefore has low ecological value. The new proposals will increase the site's quality and distinctiveness with the addition of planters to the outdoor space.

⁴https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/6351513d1afee236d4cf6ce8/1666273600232/Building_with_Nature_Standards_Framework_2.0_Oct22_Download_Version.pdf

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Standard 6: Secures Effective Place-keeping - Not considered relevant for this site as it is not known what kind of governance structure will be adopted for future management of the green infrastructure.

Standard 7: Brings Nature Closer to People - The green infrastructure proposed on site will be readily available to the occupiers of the new flats.

Standard 8: Supports Equitable and Inclusive Places – The green infrastructure is designed to encourage and enable everyone, including those from vulnerable or excluded groups, to use and enjoy it, to help reduce health inequalities and to build a shared sense of community and belonging.

Standard 9: Delivers Climate Resilient Water Management – The new proposed development does not incorporate any above ground features to manage flood risk, maintain the natural water cycle and improve the quality within the boundary of the project. Therefore, the site would benefit from such features whereby the standard is to seek to do this by recognising solutions that mimic the role of natural hydrology, managing and using rainwater close to where it falls and creating a controlled flow of clean water at source. This nature-based solution approach to water management avoids an over-reliance on 'grey infrastructure' and delivers multiple benefits including introducing different types of habitats, providing greater resilience to extreme weather events and improving resource efficiency.

Standard 10: Brings Water Closer to People – The development proposal does not include any additional blue infrastructure design due to the absence of waterbodies within the site boundary; therefore this principle cannot be met. However, the site may benefit from such features whereby consideration could be given to incorporating elements like a rainwater harvesting systems to enhance water management and environmental sustainability.

Standard 11: Delivers Wildlife Enhancement – The green infrastructure optimises long-term and climate-resilient net benefits for nature, by creating locally relevant new habitats within the boundary of the project. This in turn will support the conservation status of priority species and habitats and delivers positive benefits for wildlife, within and beyond the boundary (and life) of the development.

Standard 12: Underpins Nature's Recovery – The site and surrounding area are fully urbanised, and this absence of green infrastructure provides limited scope within the development to create effective links with any wider source of nature. Instead, the green infrastructure proposed in the development will establish important wildlife features to support the recovery of nature within the urban landscape of Newport city centre. This will help to establish and encourage a future network of green infrastructure across the urban landscape of the town centre and support the local recovery of nature.

3.2 Summary of Development and How it Meets the Core Standards

Overall, the development meets the majority of the core standards within the Building with Nature Standards Framework.

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3.3 The Stepwise Approach

The table below sets out how the Stepwise Approach has been taken in assessing impacts of a development on habitats and species.

	Steps	Assessment	Enhancement	Long term Maintenance	Net Benefits
1	Avoid	No green infrastructure will be removed from the site.	N/A	N/A	N/A
2	Minimise	No green infrastructure will be removed from the site.	N/A	N/A	N/A
3	Mitigation/restore	No green infrastructure will be removed from the site.	N/A	N/A	N/A
4	Compensate on site	Net biodiversity will be enhanced on site.	Bird and insect boxes will be installed. Planting of trees.	Species in newly created habitats selected for minimal maintenance.	Increased ecological connectivity, habitat diversity, and climate resilience
5	Compensate off site	N/A	N/A	N/A	N/A

4 Net Biodiversity Benefit

4.1 Biodiversity Enhancement

Biodiversity enhancement focuses on ecologically improving the development site by prioritising wildlife through the installation of features that enhance the level of biodiversity present, leaving the site with a net biodiversity benefit post-development. Examples of these features may include wildflower meadows, green roofs, swales, bird and bat boxes, and other habitats suitable for wildlife.

Where on-site constraints prevent placement in these locations, alternative off-site placements may be considered, provided they meet the enhancement objectives and are approved by the ecologist overseeing the project.

The green infrastructure proposed for this site that will enable it to result in a net biodiversity benefit include:

- 2 box planters;
- 1 insect box; and
- 1 bird box.

The locations recommended for these biodiversity enhancement features are shown on Plan 2.

5 Conclusion

5.1 Green Infrastructure and Net Biodiversity Benefit Statement

The new green infrastructure features on this site will create essential habitats for wildlife, as well as corridors which connect them to the wider landscape. These features will also act as navigational landmarks for species and provide protection from predators. Furthermore, they will help link the site to surrounding green infrastructure, creating habitat networks, and substantially improving the ecological value of the area.

Overall, the proposed green infrastructure on-site will result in net benefits for biodiversity post-development, by implementing features that enable the site to support more biodiversity than it did before development. This will protect and enhance the ecosystems within and adjacent to the site, ensuring that they continue to support diverse habitats and species, and increase their resilience to the changing climate.

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6 References

Building with Nature (2023) *Delivering High Quality Green Infrastructure In Wales*. Available at:
https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/6565ccf1517d747aa68af45c/1701170419121/Briefing_Paper_BwN_and_Planning_Policy_in_Wales_v1.0.pdf

Building with Nature Standards Framework (2023) Available at:
https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/6351513d1afee236d4cf6ce8/1666273600232/Building_with_Nature_Standards_Framework_2.0_Oct22_Download_Version.pdf

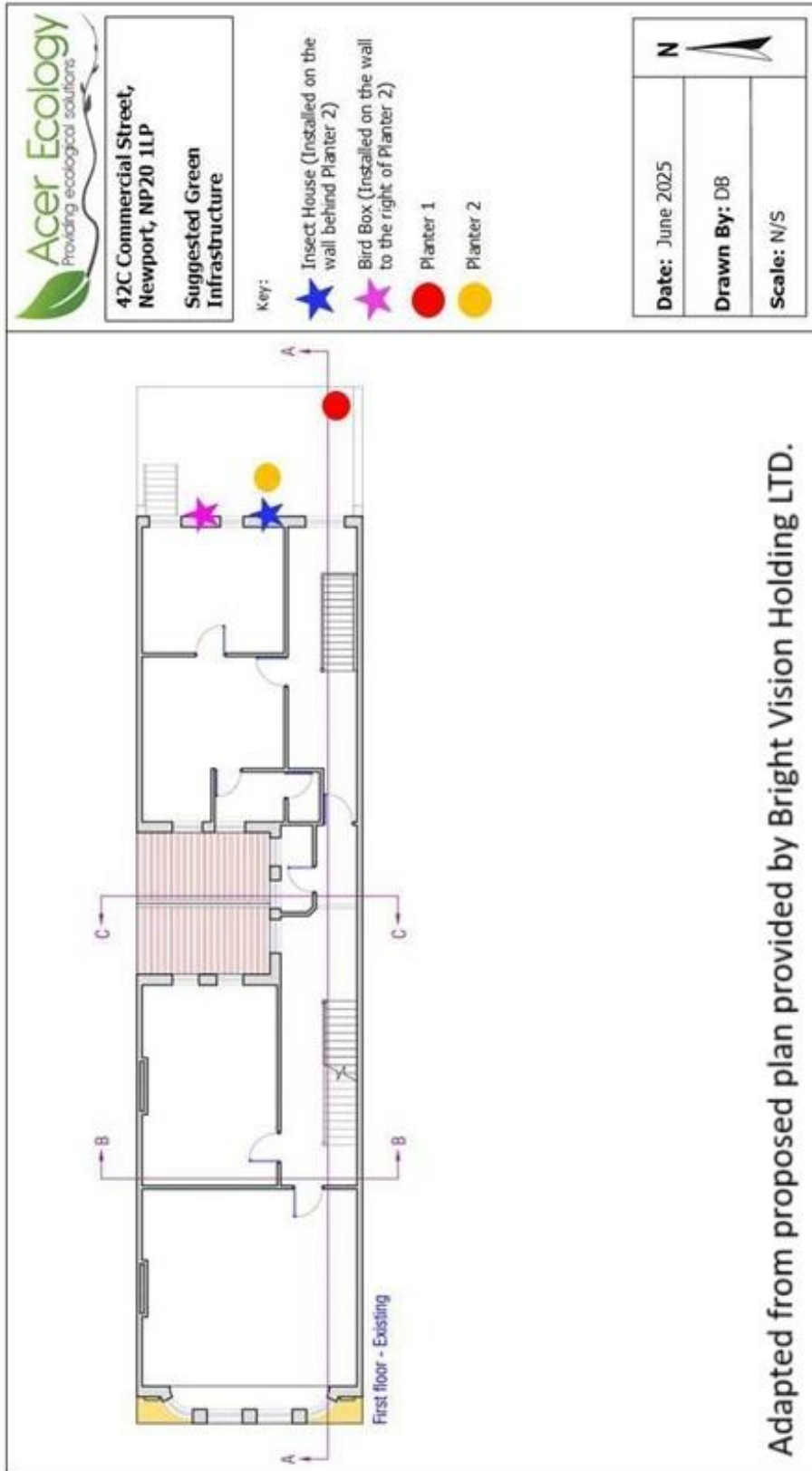
Planning Policy Wales (2024) Available online at
<https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf>

Plan 1: Site Location



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Plan 2: Proposed Green Infrastructure Location Plan adapted by Bright Vision Holding LTD.



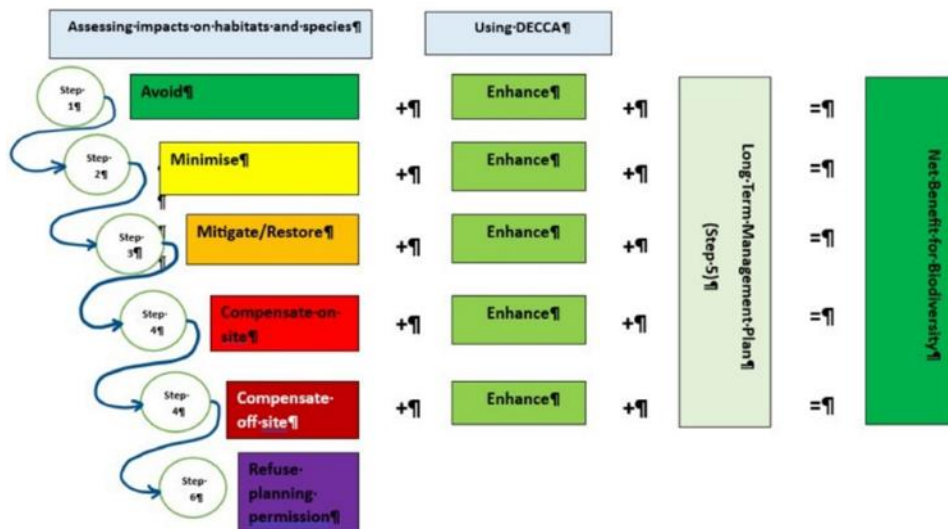
Appendix 1: Background to Requirements for Green Infrastructure Statements

On 11th October 2023 the Welsh Government issued updated National Planning Policy for chapter 6 of Planning Policy Wales. This was followed by the publication of Planning Policy Wales version 12 in February 2024

The updated policy guidance recognises the value of green infrastructure within the built environment. In order to facilitate a quality-built environment enhanced by integrated green infrastructure all planning applications must now include a green infrastructure statement.

“6.2.6 A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will 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 stepwise approach (Paragraph 6.4.21) has been applied.”

Figure 1 below sets out the summary of the stepwise approach as set out in the Annex to the published advice.



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Appendix 2: Wildlife-Friendly Planters



Planting within the proposed development will include the use of planters (see Plan 2 for proposed locations). By including a planting scheme which incorporates native species, the biodiversity and ecological resilience of the site will be significantly improved. See Section 2.3 and Appendix 3 for suggested species.

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Appendix 3: Suggested Species for Box Planters

A combination of the species below will provide a mix of textures, colours and ecological benefits, making the planters attractive and functional for wildlife.

Ornamental Grasses	Tufted Hair Grass	<i>Deschampsia cespitosa</i>	Its feathery inflorescence and attractive foliage make it a great choice for adding texture and interest to a garden. It provides cover and foraging grounds for great crested newts and other reptiles/amphibians.
	Purple Moor Grass	<i>Molinia caerulea</i>	Valued for its fine texture, movement and versatile nature.
	Blue Fescue	<i>Festuca glauca</i>	This small, clumping grass has striking blue foliage and is drought tolerant.
	Mexican Feather Grass	<i>Stipa tenuissima</i>	Known for its fine, wispy texture and tolerance to drought, it adds movement and interest to planters.
	Fountain Grass	<i>Pennisetum alopecuroides</i>	This grass has attractive, fluffy flower heads and is both drought and flood tolerant.
	Japanese Sedge 'Evergold'	<i>Carex oshimensis</i>	A tough, evergreen grass with variegated leaves, suitable for year-round interest.
Flowering Plants and Shrubs	Meadow Buttercup	<i>Ranunculus acris</i>	Creates rough grassland habitats that great crested newts can utilise to feed on insects.
	Red Campion	<i>Silene dioica</i>	Adds diversity into the grassland habitat whilst attracting invertebrates for great crested newt to feed on.
	English Lavender	<i>Lavandula angustifolia</i>	This drought-tolerant shrub attracts pollinators and adds fragrance and colour to planters.
	Wood Sage	<i>Salvia nemorosa</i>	A hardy perennial with spiky flowers that attract bees and butterflies.
	Purple Coneflower	<i>Echinacea purpurea</i>	This tough perennial has striking flowers that attract pollinators and are drought resistant.
	Ice Plant	<i>Sedum spectabile</i>	A succulent perennial that is excellent for pollinators and highly drought tolerant.
	Black-eyed Susan	<i>Rudbeckia fulgida</i>	A hardy perennial with bright yellow flowers that attract pollinators and are tolerant of various conditions.
	Ox-eye daisy	<i>Leucanthemum vulgare</i>	A hardy perennial with white daisy-like flowers that thrive in a variety of conditions and support pollinators.
	Foxglove	<i>Digitalis purpurea</i>	A biennial with tall spires of tubular flowers, favoured by bees and adaptable to shaded areas.
	Viper's bugloss	<i>Echium vulgare</i>	A drought-tolerant biennial with blue flowers that are highly attractive to pollinators.
	Honeysuckle	<i>Lonicera periclymenum</i>	A climbing plant with fragrant tubular flowers that provide nectar for moths and other pollinators.

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	Garden geranium	<i>Geranium spp.</i>	A versatile perennial with long-lasting flowers that support pollinators and thrive in various conditions.
	Redcurrant	<i>Ribes rubrum</i>	A deciduous shrub that produces edible red berries and provides nectar for pollinators in spring.
	Common Knapweed	<i>Centaurea nigra</i>	A robust perennial with purple flowers that are a key resource for pollinators in grasslands.
	Forget-me-not	<i>Myotis sylvatica</i>	A low-growing annual or biennial with blue flowers that support pollinators in spring.
Small Shrubs	Hebe 'Autumn Glory'	<i>Veronica sect. Hebe</i>	This compact shrub has long-lasting purple flowers and is attractive to pollinators.
	Cotton Lavender	<i>Santolina chamaecyparissus</i>	A drought-tolerant shrub with silver foliage and yellow button flowers.
	Common Thyme	<i>Thymus vulgaris</i>	An aromatic shrub that attracts pollinators and is drought tolerant.
Additional Suggestions	Mexican Fleabane	<i>Erigeron karvinskianus</i>	A resilient, spreading plant with small daisy-like flowers, good for filling gaps and attracting pollinators.
	Ivy	<i>Hedera helix</i>	A climber providing year-round ground or wall cover, with late-season flowers and berries that benefit pollinators and birds.
	Tall Verbena	<i>Verbena bonariensis</i>	Tall, airy stems with clusters of small purple flowers, great for pollinators and tolerant of dry conditions.

Please note: the above tables include suggestions; however, they are not an exhaustive list, and advice should be sought from a horticulturist.

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Appendix 4: Insect House Guidance and Recommendations

Design

Insect hotels should be made from natural, untreated materials such as bamboo, hardwood blocks, or hollow stems. Nesting holes should be smooth and varied in diameter (2–10 mm) to attract a range of species. Avoid plastic components or poorly ventilated designs, which can trap moisture and encourage mould. Ensure materials are tightly packed and replaceable to maintain cleanliness and reduce disease risks.

Placement

Position insect hotels in a sunny, sheltered location, ideally south or southeast-facing. They should be mounted off the ground to prevent exposure to damp conditions and reduce the risk of predation. Avoid shaded or overly wet areas, as these are less suitable for insects such as solitary bees.

Maintenance

Regular inspections should be carried out to check for mould, damage, or pest infestations, and replace contaminated or worn-out materials as needed. While overwintering insects should not be disturbed, materials can be cleaned or replaced before the active season in spring to prepare for new occupants.

Complementary Habitat Enhancements

To support the insects attracted to the hotel, establish nearby wildflower-rich areas that provide a consistent food source. Additional features such as hedgerows, bare soil patches, and ponds can further enhance the surrounding habitat, offering shelter and resources for a wider range of species. Pesticide use should be avoided or limited to an absolute minimum to maintain a safe and ecologically supportive environment.

The Bee and Bug House



The Bee and Bug House provides valuable habitat for solitary bees and other insects.

The top chamber features seven wooden nesting tubes in a wooden block, together with bamboo tubes of various sizes. A centre feeding hole is perfect for attracting ladybirds, earwigs and lacewings. The lower chamber is filled with pine cones which provide plenty of nooks and crannies for insects such as lacewings.

Removing the wooden retainer dowel allows you to replace the pine cones with alternative natural materials, such as straw or bark, which will provide an excellent winter habitat for lacewings, ladybirds, woodlice, earwigs and many other bugs.

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The Bug and Bee House will be painted with a water-based exterior paint. (An annual coat of paint will both keep it looking its best and prolong its life).

Specification

Height: 240 mm

Width: 170 mm

Depth: 105 mm

Weight: 1 kg

Available from: www.nhbs.com/bee-and-bug-biome

The Pinta Apex Insect House



The Pinta Apex Insect house is constructed from FSC timber. Solitary bees, wasps, and other invertebrates will use the box to lay eggs in providing a great opportunity for children to watch and learn about the lifecycle of these important and beneficial creatures.

For best results place in a sunny, sheltered location near vegetation, preferably no higher than 2m.

Specification:

- Width: 17cm
- Height: 19.5cm
- Depth: 11cm
- Weight: 800g

Available at: [NHBS Pinata Apex Insect House | Practical Conservation Equipment](#)

Appendix 5: Bird Box Guidance and Recommendations

Bird nesting opportunities will be enhanced through the provision of an artificial bird box. One Schwegler 1SP Sparrow Terrace or suitable equivalent will be installed on the wall at the rear of the building at a minimum height of 3m from ground level.

Location plans for the positioning of the boxes can be found in Plan 2.

Schwegler 1SP Sparrow Terrace Bird Box



Sparrows are gregarious and prefer to nest close to each other, so this triple-nest box provides room for three families under one roof. It's made from long-lasting, breathable Woodcrete to provide the optimum environment for sparrows to nest and rear their chicks.



Positioning: On buildings of all kinds in typical habitats including industrial buildings and barns at a height of at least 2m.

Suitable for: House and tree sparrows and individual redstarts

Material: Woodcrete PLUS

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Height: 240mm

Width: 430mm

Depth: 220mm

Weight: 15kg

Brood chamber dimensions: Height: 16cm, Width: 10.5cm, Depth: 15cm,

External dimensions: Height: 24.5cm, Width: 43cm, Depth: 20cm, Weight: 15kg