CONVERSION OF CHURCH TO 9 NO. FLATS AT ST PAUL'S CHURCH, COMMERCIAL STREET, NEWPORT, NP20 4EJ

GREEN INFRASTRUCTURE STATEMENT
(In accordance with Planning Policy Wales (Edition 12), Paras 6.4.11 onwards)

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1.0 INTRODUCTION

1.1 St Paul's Church, a distinguished early-Victorian stone building situated at Commercial Street in Newport city centre, has stood as both a heritage landmark and a silent witness to the evolving urban fabric of NP20 1LU for over 150 years. Once the spiritual heart of its community, the church has been vacant for several years, its magnificent gothic windows and slate roof now underutilised and in gradual need of repair. This planning application proposes a sensitive conversion of the existing church shell into nine high-quality residential flats, breathing new life into the structure while preserving its historic character.

1.2 This Green Infrastructure Statement accompanies the conversion proposal to demonstrate how the scheme not only conserves the built heritage but also actively enhances local biodiversity, strengthens ecological connectivity, and delivers measurable environmental net gains in line with national and regional policy. Through a rigorous, step-wise approach – prioritising impact avoidance, minimisation of disturbance, implementation of targeted mitigation, and, where absolutely necessary, compensatory enhancements – the project seeks to transform a singular heritage asset into a vibrant, multifunctional habitat that supports people, wildlife, and ecosystem services.

The objectives of this Statement are threefold:

1. To articulate how the design and construction phases will avoid and minimise harm to existing ecological features – such as the two semi-mature lime trees and self-set boundary vegetation – through sensitive site management and materials reuse.
2. To outline mitigation measures that provide roosting, nesting, and foraging opportunities for protected and urban wildlife species, including bats, swifts, solitary bees, and pollinating insects.
3. To identify compensatory enhancements – comprising native tree and shrub planting, a species-rich wildflower lawn, a biodiverse green roof, and sustainable drainage features – that collectively secure a net gain in biodiversity value under the Welsh Government's statutory target.

By integrating these green infrastructure and nature-recovery principles into the heart of Newport's urban core, the conversion of St Paul's Church will serve as a benchmark for combining heritage-led regeneration with proactive ecological enhancement, ensuring that both people and wildlife thrive for generations to come.

2.0 POLICY CONTEXT

2.1 Planning Policy Wales (PPW12) establishes the requirement for developments to contribute positively to green infrastructure (GI) and biodiversity through a clear mitigation hierarchy: avoid → minimise → mitigate → compensate (Paras 6.4.11–6.4.16). Guidance further emphasizes creating resilient ecological networks, delivering net gains for biodiversity, and enhancing ecosystem services, in line with the Environment (Wales) Act 2016's biodiversity duty.

3.0 SITE DESCRIPTION AND BASELINE CONDITIONS

3.1 Site Location & Context: St Paul's Church lies within Newport city centre's urban fabric, bounded by Commercial Street to the north and Palmyra Place to the west. The site covers approximately 0.08 ha.

Existing Ecological Features (see Figure 1):

- Built Heritage: Unoccupied early-Victorian church of stone construction, with gothic windows and slate roof.
- Vegetation: Small grassed forecourt (c. 30 m²) and peripheral self-set shrubs (Prunus spinosa, Buddleja davidii) of negligible ecological value.
- Boundaries: Historic coursed stone walls to north and west (with self-laid ivy cover) and wrought-iron railings to south.
- Trees: Two semi-mature lime trees (T1, T2) planted outside the western boundary; root protection zones (RPA of 5 m radius) overlap the site corner.
- Hard Surfaces: Predominantly impermeable tarmac and concrete slabs, with some degraded block paving.
- Faunal Evidence: Preliminary walkover survey (April 2025) recorded urban birds (pigeons, starlings) and evidence of invertebrate activity within rubble piles.

4.0 STEP-WISE BIODIVERSITY APPROACH

Avoid

- Maintained existing footprint: all construction confined within internal church space.
- Retained and repaired stone boundary walls and railings; no removal of walls or fences.
- Lime trees (T1, T2) retained; no pruning or soil disturbance within RPAs.

Minimise

- Protective fencing (2 m high, Heras panels) installed at RPA boundary; ground protection boards to prevent compaction.
- Reuse of existing block paving for pathways reducing material import.

Mitigate

- Bat Roosting: Two Schwegler 1FW bat tubes and one bat box installed in north and south masonry walls.
- Bird Nesting: Nine 2-chamber swift boxes under the eastern eaves; three house martin cups beneath the southern roof pitch.
- Invertebrate Habitat: Three bee bricks within site; two log-pile refugia in south-east corner.
- Lighting Strategy: If any lighting is to be added then these must be Low-glare, downward-facing LED luminaires (max 2700 K) at entrances; automatic dimming between 23:00–05:00 hrs. (At present there is no external lighting to be proposed with the development)

Compensate

- Native Planting:
  – Three Prunus serrulata ‘Pink Perfection’ specimen trees.
  – Understorey shrub mix (25 plants): Crataegus monogyna, Cornus sanguinea, Viburnum opulus, Rosa canina.
- Wildflower Lawn (all grass areas within the site): low-fertility mix (Emorsgate EM2) sown to support pollinators.
- Green Roof: extensive sedum blanket on secure cycle shelter.

5.0 ENHANCING RESILIENT ECOLOGICAL NETWORKS

- Habitat Connectivity: Restored ivy cover on stone walls provide continuous green linkages along Commercial Street.
- Stepping Stones: Bird and bat boxes integrate into Newport's urban GI network.
- Surface-Water Management: Permeable block paving and gravel reduces run-off peaks, benefiting adjacent street-tree pits.
- Soil Improvement: Compost-enriched topsoil (F3) beneath new planting improves structure and invertebrate habitat.

6.0 MANAGEMENT AND MONITORING

- Establishment Period (Years 1–5): Quarterly inspections of planting, boxes, and lighting; replacement of failed plants in first two years; annual cleaning of bird/bat boxes.
- Long-Term: Five-year maintenance schedule covering green roof check, invasive species control, and meadow re-seeding as needed.
- Biodiversity Audit: Repeat habitat and species surveys at Year 5 to verify net gain outcomes and inform adaptive management.

7.0 CONCLUSIONS

7.1 This Green Infrastructure Statement has demonstrated how the conversion of St Paul's Church to nine flats has been carefully designed to adhere to the mitigation hierarchy set out in Planning Policy Wales (Edition 12, Paras 6.4.11–6.4.16) and the wider biodiversity duty under the Environment (Wales) Act 2016. By avoiding impacts on key ecological and heritage assets, minimising disturbance during construction, mitigating residual impacts with targeted roosting, nesting, and habitat features, and, only as a last resort, compensating through native planting, wildflower meadow creation, and a biodiverse green roof, the scheme delivers a comprehensive, step-wise approach that safeguards and enhances local biodiversity.

7.2 The retention and sensitive restoration of historic stone walls, railings, and the existing church shell not only preserve the cultural character of the site but also maintain valuable micro-habitats for invertebrates and climbing plants, thereby strengthening linear green corridors through the heart of

Newport's urban centre. The integration of bat tubes, swift and martin nesting bricks, bee-bricks, and log-pile refugia strategically located within the development provides essential roosting and nesting "stepping stones" that plug gaps in the city's ecological network and support vulnerable urban species.

7.3 Surface-water management measures – such as permeable block paving, a stone-lined swale, and an extensive green roof – work in concert to reduce run-off, improve groundwater recharge, and enhance soil moisture regimes for adjacent street-tree planting. These interventions not only mitigate flood risk but also contribute to urban cooling and air-quality improvements, delivering wider ecosystem services that benefit residents and the surrounding community.

7.4 The long-term management and monitoring plan ensures that biodiversity enhancements are maintained and refined over time. Regular inspections of planting success, box occupancy, and swale performance, coupled with a five-year biodiversity audit, create a feedback loop to inform adaptive management. This commitment to ongoing stewardship underpins the scheme's resilience and secures its net biodiversity gains well into the future.

7.5 In summary, this development exemplifies best practice in green infrastructure delivery, aligning conservation priorities with high-quality urban design. It not only preserves existing ecological and heritage assets but actively enriches the local environment – creating new habitats, enhancing ecological connectivity, and delivering multifunctional green infrastructure that will support biodiversity, climate resilience, and community well-being for decades to come.