

Greenmoor Nurseries, St Brides, Wentloog, Newport, NP10 8SQ

Erection of Rural Enterprise Dwelling Associated with the Existing Dog Kennels and Wider Enterprise at Greenmoor Nurseries, St Brides

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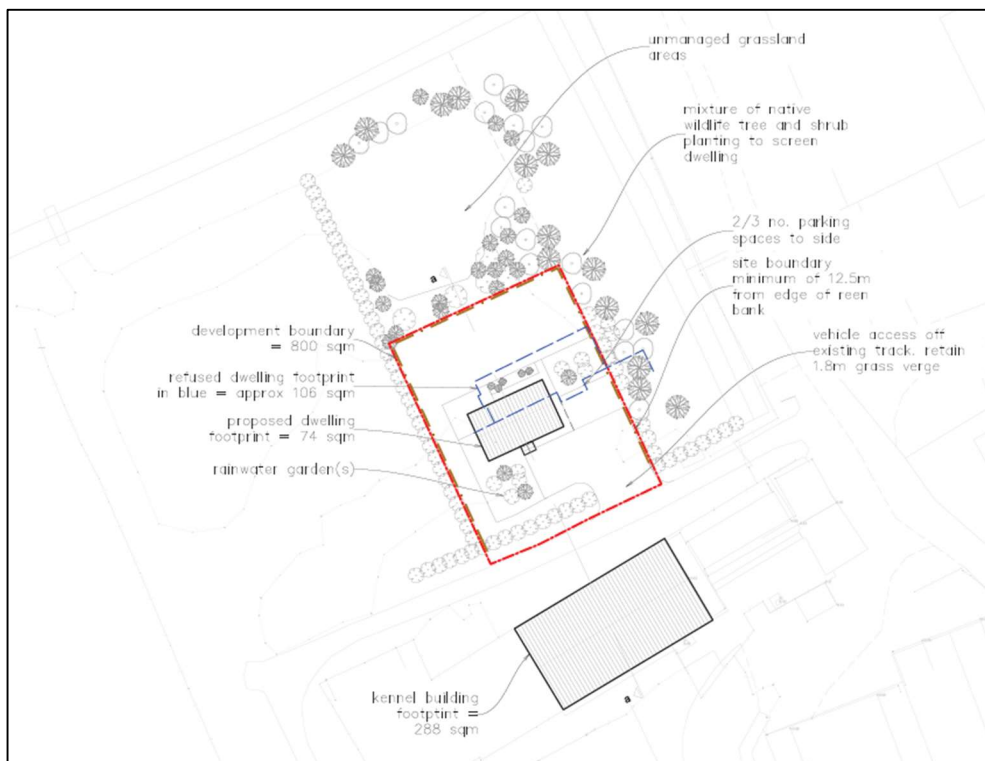
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1. Introduction

- 1.1. This Green Infrastructure Statement has been prepared in support of an application for Full Planning Permission, submitted on behalf of Ms Helen Thomas, in relation to the following development proposal.

'Erection of a rural enterprise dwelling associated with the existing dog kennels and the wider enterprise at Greenmoor Farm, St Brides'

- 1.2. The proposals comprise the development of a two-storey rural enterprise dwelling (and associated works) for the purpose of providing essential accommodation for the enterprise. An extract of the proposed block plan can be seen below:



Proposed Block Plan

Site Context

- 1.3. The application site consists of an area of scrub land located directly adjacent to (north of) the existing kennels building / operation. The proposed development site and kennels building are separated by a farm track leading into the paddocks to the west of the farm building complex.
- 1.4. The site represents a generally flat parcel of land that has historically been used for the storage of farm machinery and other equipment associated with the wider enterprise. An extract of the site location plan can be seen below for reference.

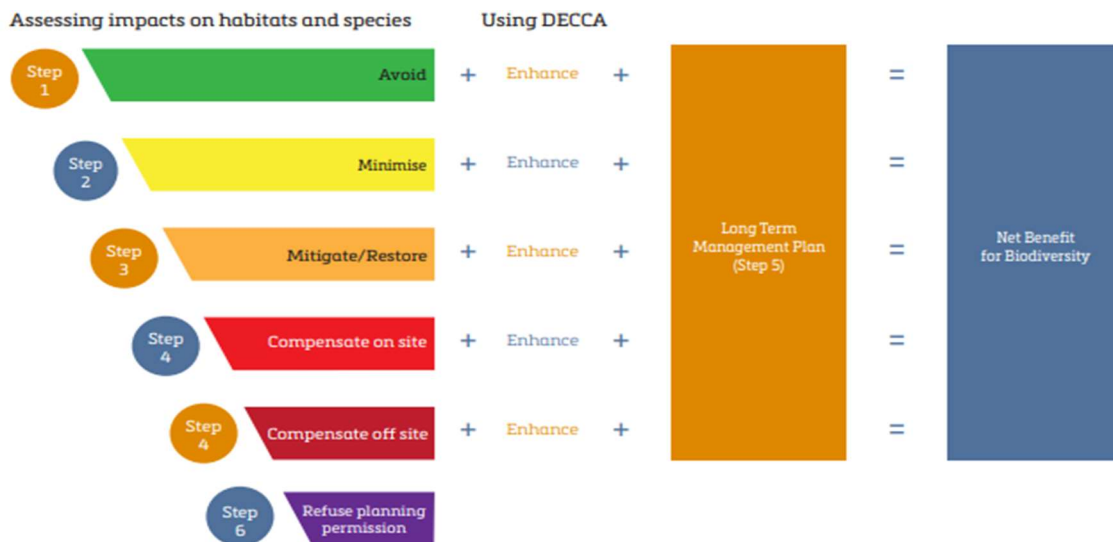
2. Policy

2.1. This Green Infrastructure Statement has been formulated in accordance with Chapter 6 of Planning Policy Wales (PPW 12). This states that it is now considered necessary for all planning applications to be supported by a Green Infrastructure Statement.

2.2. In short, the overall objective of the Green Infrastructure Statement is to ensure any disruption to biodiversity is kept to a minimum as a result of the development. The pertinent text has been extracted below from the attached document Chapter 6 of PPW 12.

“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 multifunctional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (Paragraph 6.4.15) has been applied”.

2.3. The Step-Wise Approach set out in PPW 12 (Figure 12) is extracted and summarised below:



2.4. The Step-Wise Approach seeks to prioritise the protection of existing biodiversity and to mitigate for any loss of biodiversity, to ensure that an overall net benefit is secured through any new development.

2.5. Paragraph 6.4.16 states: ‘All development must deliver a net benefit for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed)’.

2.6. As such, this statement will outline the measures the proposal will take to ensure it is compliant with the policy position set out in PPW12.

3. Ecology and Green Infrastructure Baseline

- 3.1. To establish the ecological baseline of the site an updated Preliminary Ecological Assessment has been commissioned by the applicant. This Assessment sets out a range of green infrastructure features, such as habitats, trees, and species, present within the site and outline the necessary measures to ensure an overall net gain for biodiversity is achieved as part of the proposals.
- 3.2. This section of the statement outlines the findings of this document, whilst Section 4 of this statement outlines the measures that will be taken into account, and incorporated into the proposed development.
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Preliminary Ecological Assessment (PEA)

- 3.3. The Preliminary Ecological Assessment sets out the findings of the desktop studies and walkover surveys which were undertaken in August 2022 and September 2025 respectively. The report details the existing ecological conditions of the site, as well as identifying any potential ecological constraints/opportunities associated with the proposals.
- 3.4. The PEA sets out that Greenmoor Nurseries is located within the Gwent levels, an extensive area of reclaimed wet pasture along the Severn Estuary between Chepstow and Cardiff. The area is drained by a network of reens which support a diverse range of plant and invertebrate species.
- 3.5. The PEA also sets out that the site is occupied by disturbed grassland and tall herb habitats, with bare ground, debris piles, stored items and vegetable growing raised planting beds (2022) and is bordered by reens and associated scrub to the north and east and by the kennels, yard and access track to the south and west.
- 3.6. The following habitat details were recorded within the footprint of the proposed development:
- Bare ground with debris piles;
 - Raised soil beds used for pumpkin planting (2022);
 - Tall herbs and modified neutral grassland extending north and west into semi-improved grassland and tall herb communities;
 - Scrub with reen (east boundary);
 - Raised bank/bund with a shallow, shaded reen;
 - Dominated by Hawthorn, Blackthorn, Elder, and Willow;
 - Sub-optimal habitat quality due to fencing, access track, and lack of emergent plants;
 - Reedbed with reen (north boundary);
 - Dominated by Common Reed;
 - Higher habitat quality, undisturbed, and unmanaged recently; and
 - No structures or trees with any potential to support roosting bats were recorded within the application site.
- 3.7. The PEA continues by stating that in the absence of suitable mitigation and enhancement measures, the proposed development could have the following potential impacts

Designated Sites

- The development lies within the Gwent Levels: St Brides SSSI; and
- Habitats present are mostly not typical of the SSSI's designatory features, but proximity means potential indirect effects must be considered.

Habitats

- Development close to the eastern scrub line and reen could cause;
 - Direct habitat loss or degradation;
 - Reduced connectivity (e.g., for commuting/foraging bats);
 - Pollution risks to the reen;
- Indirect impacts possible on the northern retained reen with reedbed and scrub, from;
 - Vehicle movements;
 - Material storage;
 - Runoff during works; and
- Main development area affects disturbed ground habitats: tall herbs, modified grassland, raised planting beds, bare ground, and debris piles.

Species

- **Reptiles:** Debris piles may support low numbers of slow-worm and grass snake (recorded within 400–650m);
 - Site itself has reduced suitability due to disturbance and bare ground;
 - Precautionary working methods needed to protect reptiles and other species (Hedgehog, Water Vole, Otter) that may move through the site or adjacent reens;
- **Birds:** Nesting birds in scrub to the east and north could be disturbed during works;
- **Bats & Nocturnal Species:** Artificial lighting could negatively affect them without controls;
- **Great Crested Newt;**
 - Potential use of northern reen (species recorded ~900m away);
 - Eastern reen unsuitable due to poor habitat quality;
 - Site offers limited opportunities due to disturbance and lack of connectivity with water features to east/south;
 - Precautionary measures will benefit amphibians generally; and
- **Shrill Carder Bee:** Site currently offers low potential for this species

3.8. The PEA confirms that mitigation and enhancement measures can be implemented to ensure that the proposals do not have any of the above potential impacts. The mitigation and enhancement measures that can, and will, be incorporated into the proposals are discussed in the following section of this statement.

4. Green Infrastructure Strategy & Enhancement Measures

- 4.1. In light of the step-wise approach, proposals must avoid and minimise their impact on the existing levels of green infrastructure present on the site and, where necessary, mitigation and compensation must be implemented to offset the implications of any loss.
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Step-Wise Approach

Avoidance, Minimisation and Mitigation Measures

- 4.2. As outlined in the Preliminary Ecological Appraisal (PEA), a series of avoidance, minimisation, and mitigation measures will be implemented as part of the proposed development. These measures are intended to prevent or minimise impacts on biodiversity and existing green infrastructure wherever possible. The avoidance measures to be adopted include the following:

- **Buffer Area:** The scheme will be offset from the eastern scrub line by a minimum of 2.5m. Instead, ecological beneficial planting will be planted in this buffer area;
- **Red Line Area:** The works will be restricted within the redline boundary and areas of existing bare ground, hard standing and access tracks;
- **Timing of Works:** Clearance of the site should take place between March and September inclusive, when reptiles are likely to be active so less vulnerable to disturbance;
- **Nesting Birds:** If nesting birds are found during works, the works will be delayed until the young birds have left the nest;
- **Covering Works:** Overnight, no excavations will be left open or, if this is unavoidable, a ramp, such as a plank of wood, will be left at a maximum angle of 45 degrees - this will allow animals that have fallen in to escape;
- **Lighting:** No external lighting will be installed unless agreed in advance in writing with the LPA;
- **Clearance of Debris:** At the start of works an inspection should be made. For the clearance of existing debris, vegetation and planting areas it should be undertaken by hand where possible and with due care. If any species are encountered, they will be carefully relocated.
- **Ecologist Consultation:** No works within 5m of the ree to the north of the site nor within 2m of the ree to the east of the site, nor to any existing reedbed or scrub habitat areas adjacent to the reens will be taken out until an ecologist has been consulted;
- **Unexpected Protected Wildlife:** If protected Wildlife Species are found throughout the development, works will cease until suitable advice by a wildlife specialist has been sought.

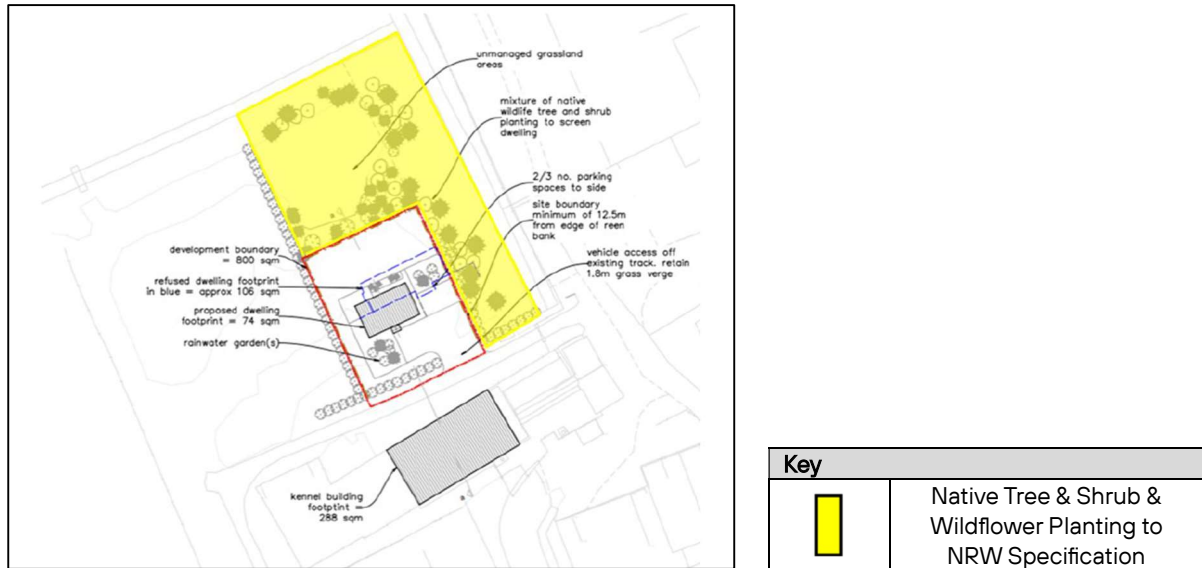
Enhancement Measures

- 4.3. In addition to the avoidance, minimisation, and mitigation measures outlined above, the site offers opportunities to deliver appropriate ecological enhancements aimed at achieving an overall biodiversity net gain. Accordingly, and in line with Planning Policy Wales (PPW) Edition 12, the following enhancement measures are proposed:

- **Planting Exercise:** Additional stretches of native-species will be planted to enhance habitat connectivity, provide shelter and foraging resources for wildlife, and contribute to biodiversity net gain; and
- **Bat and Bird Box Installation:** Bat and bird boxes will be erected at appropriate locations throughout the site to support local bird populations and compensate for habitat loss.

Planting Exercise

- 4.4. As set out within the PEA, any new landscape planting proposed will be of native, locally typical species of tree, shrub or wildflower grassland seeding in line with the Gwent Levels lists as recommended by Natural Resources Wales or will utilise a local source of species rich green hay from the levels.
- 4.5. The area proposed for additional planting can be seen below for reference:



Proposed Area of Landscaping

Bat and Bird Boxes

- 4.6. Bat and bird boxes will be introduced at the site, being mounted on the dwelling at appropriate heights. The proposed location of these features can be seen below for reference, however, are demonstrated in more detail within the submitted PEA



Proposed Bat and Bird Box Locations

4.7. Examples of the proposed bat and bird boxes can be seen below for reference.



Woodstone Sparrow Nest Box



Segovia Woodstone Build-in Bat Box

4.8. In light of the above, it is considered that these measures, which ensure the proposals adherence to the stepwise approach, are achievable on the proposed development site, and would, as set out within the PEA, ensure a net gain for biodiversity is secured.

Long Term Management

4.9. Given the nature of the proposals, the scheme will benefit from long-term management, maintenance, and monitoring attended to by the applicant. This arrangement will ensure the above measures are secured in terms of their condition and functional integrity in the long-term.

5. Summary and Conclusions

Summary

5.1. Having regard to the above, and in summary, it is considered that the proposed development should be considered acceptable and compliant with the recently updated Chapter 6 of PPW 12, in light of the following key factors:

- A stepwise approach, informed by thorough surveys and site assessments, has been adopted to avoid damage and disturbance to the existing green infrastructure wherever possible;
 - To minimise disturbance to protected species and the site's ecology, considerate construction practices will be employed throughout the works. These will be monitored by a licensed ecologist and scheduled in accordance with appropriate seasonal timing;
 - The Preliminary Ecological Appraisal (PEA) confirms that the site's biodiversity does not present a fundamental constraint to development, provided that suitable mitigation and enhancement measures are implemented;
 - To achieve a net biodiversity gain, the following green infrastructure enhancements will be incorporated, supplementing the existing on-site provisions;
 - An appropriate planting exercise in line with NRW guidance; and
 - Integration of bat and bird boxes into the fabric of the new build.
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Conclusion

5.2. Accordingly, it is considered that the proposed development is acceptable in terms of its impact on the environment and biodiversity, and is fully in accord with Chapter 6 of PPW 12.



GJP.

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