

# **GREEN INFRASTRUCTURE STATEMENT TO SUPPORT S73 APPLICATION TO VARY CONDITION 1 (APPROVED PLANS) OF PLANNING PERMISSION – 25/0294**

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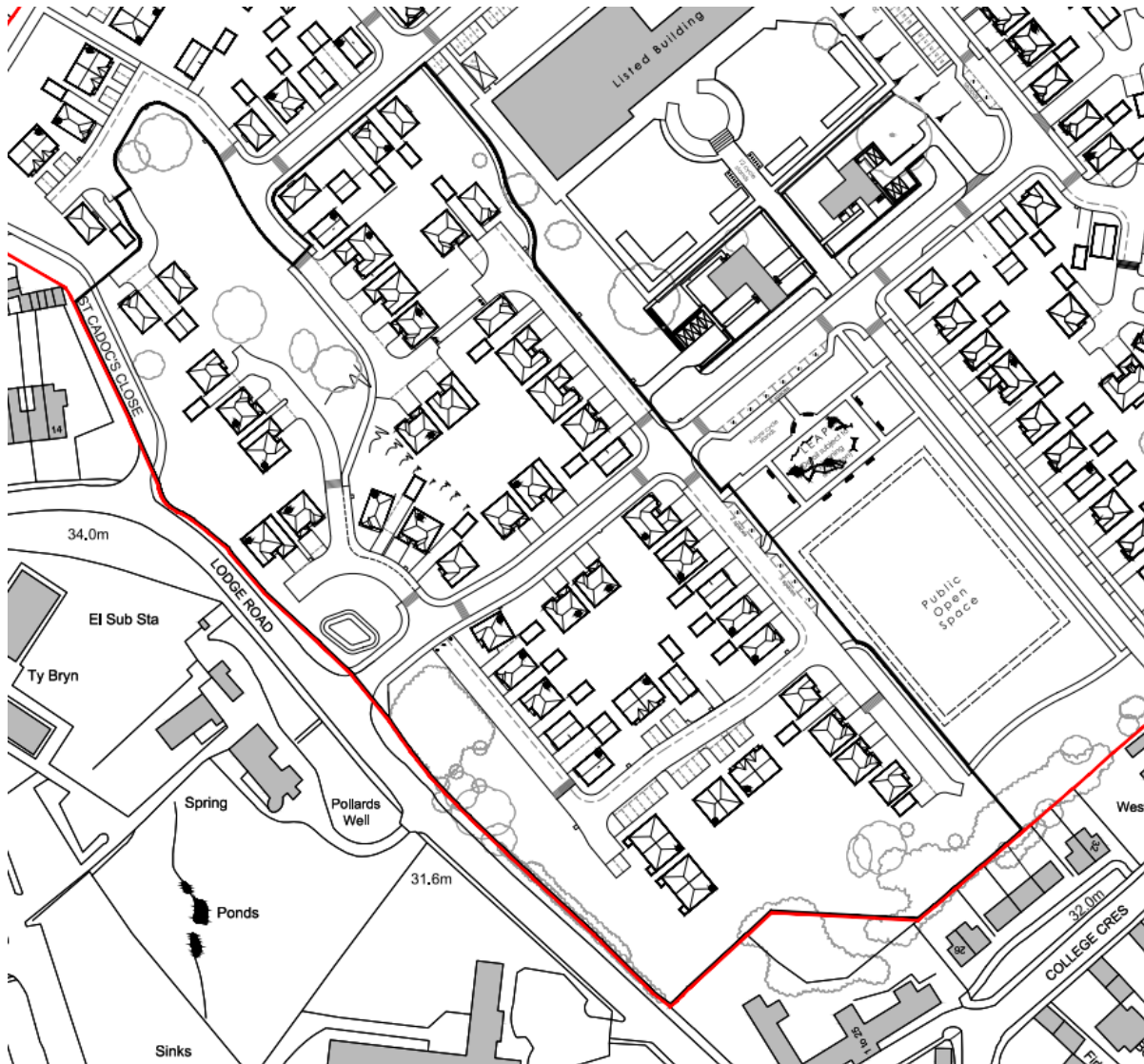
## **1. INTRODUCTION**

1.1. This Green Infrastructure Statement has been prepared in order to support a S73 APPLICATION TO VARY CONDITION 1 (APPROVED PLANS) (INSOFAR AS THEY RELATE TO PLOTS 91-111 ONLY) OF 23/0682 S73 APPLICATION TO VARY CONDITION 1 (APPROVED PLANS) OF 19/1212 PARTIAL DEMOLITION, REFURBISHMENT AND CONVERSION OF MAIN BUILDING TO 44 FLATS, CONVERSION OF TJ WEBLY BUILDING TO 2NO. DWELLINGS, CONVERSION OF TY HYWEL BUILDING TO 2NO. RESIDENTIAL UNITS (1 FLAT AND 1 HOUSE), CONVERSION OF FELTHORPE TO 1NO. DWELLING, DEMOLITION OF OTHER EXISTING BUILDINGS AND CONSTRUCTION OF 170 NO. DWELLINGS, OPEN SPACE, LANDSCAPING, ENGINEERING AND INFRASTRUCTURE WORKS TO INCLUDE RETENTION OF LISTED GATE PIERS. AMENDMENTS INCLUDE CHANGES TO PLOTS 91 to 111 AND THEIR ASSOCIATED LANDSCAPING AND ENGINEERING ONLY. The changes have been driven by the needs to facilitate SAB features at the site.

1.2. The entire site extends to approximately 13.3 hectares and is located in Caerleon, Newport, approximately 300m to the north west of Goldcroft Common District Centre, 2.2 km to the east of the A4042 and 1.8 km to the north of the M4. The site is located approximately 6km northeast of Newport.

1.3. Development has commenced on site with over 50% of plots now either now occupied or under construction. The Grade II listed Edwardian main building is also being developed by Acorn Property Group for the purpose of 44 flats. Three original listed buildings remain on the site, along with Felthorpe House. T J Webley and Ty Hywel listed buildings will comprise of 4 new dwellings. Felthorpe House will be converted to 1 new dwelling.

1.4. The S73 Application seeks to make amendments to Plots 112 to 170 and the associated engineering and landscaping features. Please see plan below for precise area that is subject to amendments under this S73 application:



The original application was not supported by a Green Infrastructure Statement with the requirement only coming into force in 2024. However, the application was supported by a raft of landscaping and ecological information that is drawn upon to produce this Green Infrastructure Statement.

## 2. PLANNING POLICY CONTEXT

2.1 This section sets out the relevant policy context surrounding the green infrastructure at the site.

2.2 **Well-being of Future Generations (Wales) Act 2015:** The Act requires public bodies to carry out **sustainable development**. Sustainable development principle 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.

**2.3. Environment (Wales) Act 2016:** The Act 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 "must be taken into account:

- *diversity between and within ecosystems;*
- *the connections between and within ecosystems;*
- *the scale of ecosystems;*
- *the condition of ecosystems (including their structure and functioning);*
- *the adaptability of ecosystems."*

### **National Planning Policy**

**2.4. Future Wales: The National Plan:** The 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 Wellbeing of Future Generations (Wales) Act 2015.



**The seven well-being goals from Well-being of Future Generations (Wales) Act, 2015**

2.4. The key policy in relation to 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.*”

### **Planning Policy Wales (PPW)**

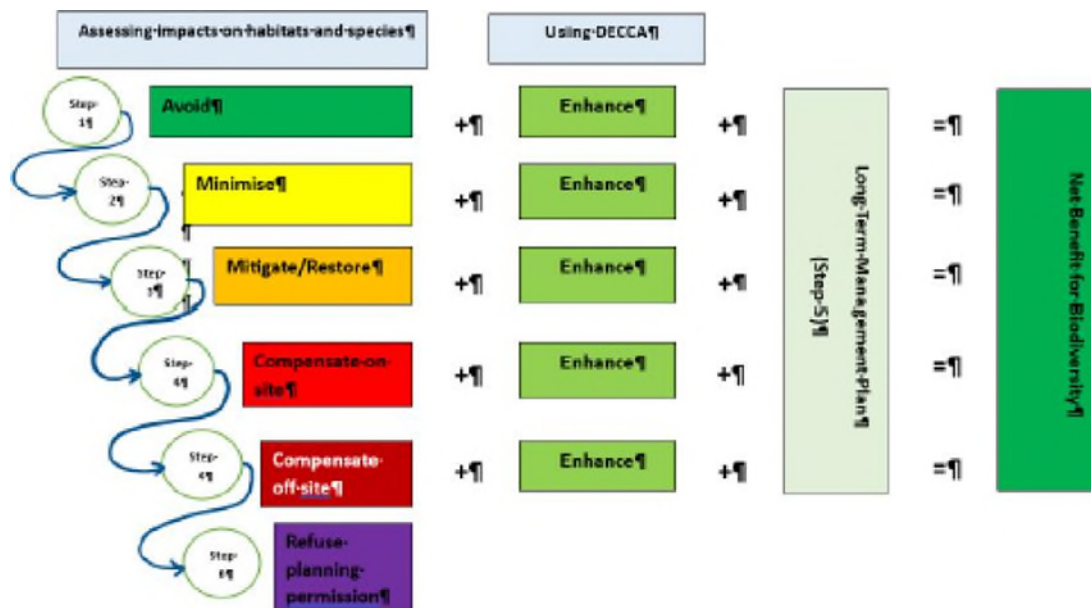
2.5. PPW aims to contribute towards the delivery of sustainable development, embedding the principles of the Well-being of Future Generations (Wales) Act 2015. PPW ingrains Placemaking Wales Charter and how sustainable development can be achieved through implementing placemaking.

2.6. Section 6 sets out **green infrastructure** and how it can be integrated into developments, which should be **protected and enhanced** due to the **multifunctional** roles. **A proactive approach to green infrastructure and biodiversity** should be adopted to **help reverse the decline in biodiversity and increase the resilience of ecosystems**.

2.7 Chapter 6 provides details on securing net benefit for biodiversity through the application of the step-wise approach. The use of the green infrastructure statement as a means of demonstrating the stepwise approach is made explicit. A proactive approach to Green Infrastructure is advocated.

2.8 In regard to Green Infrastructure Statements, it is confirmed that the submission of proportionate green infrastructure statements with planning applications and signposting Building with Nature standards.

### **The Step-Wise Approach from Chapter 6 update Annex**



## Local Planning Policy

### Newport Local Development Plan - 2011 - 2026 (Adopted 2015)

2.9. The Newport Local Development Plan recognises the importance of conserving, enhancing, and linking green infrastructure within several policies:

- SP1 Sustainability (ix)
- SP2 Health
- GP1 General Development Principles – Climate Change
- GP5 General Development Principles – Natural Environment
- CE3 Environmental Spaces and Corridors

## Supplementary Planning Guidance (SPG)

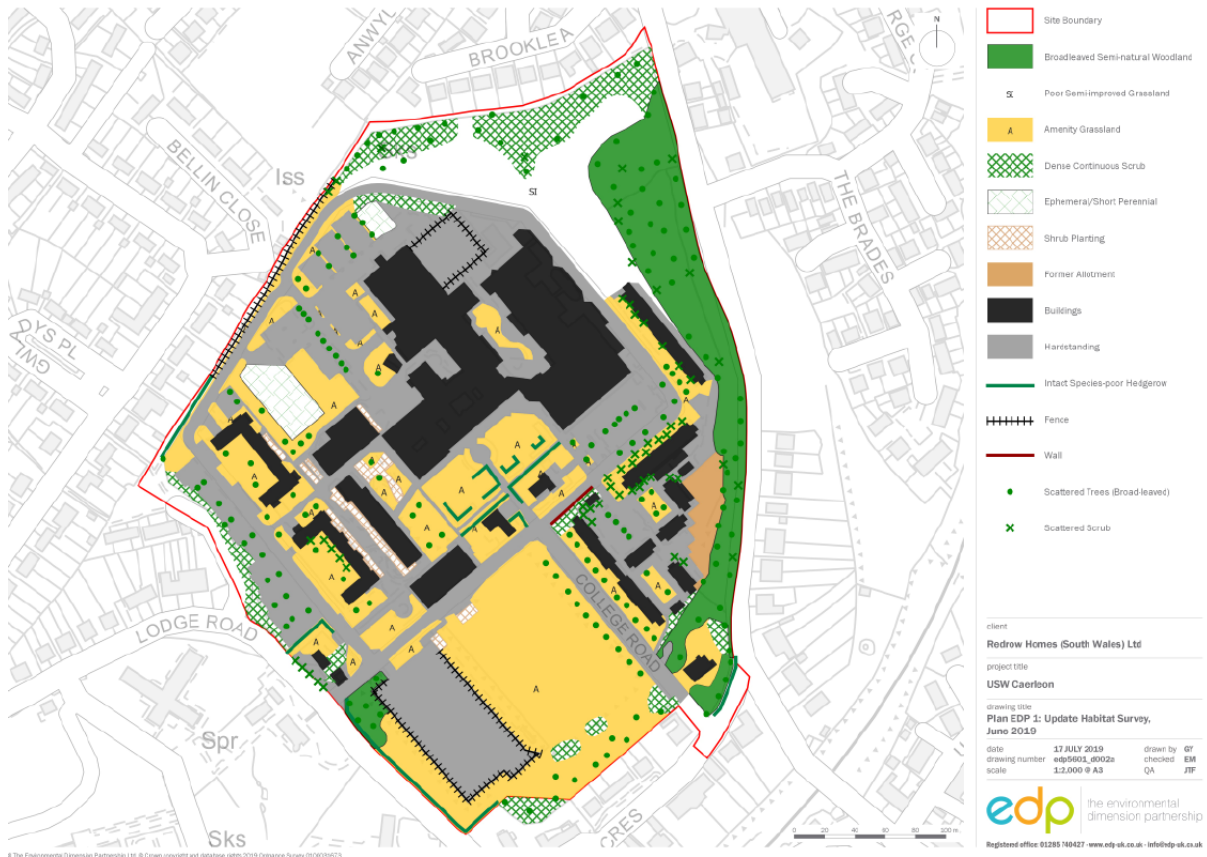
2.9 The Newport Local Development Plan provides SPG of relevance to green infrastructure and biodiversity:

- Trees, Woodland, Hedgerows and Development Sites (January 2017)
- Wildlife and Development (August 2015)

### 3 EXISTING GREEN INFRASTRUCTURE (Stepwise Approach Stage 1 – Audit)

3.1. At the time of the original application the site was dominated by hardstanding and buildings which were predominantly vacant. The table below summarises the habitats identified at the time of the original application with the plan overleaf detailing the locations of habitats on site:

| Habitat/ Feature                            | Distribution within Application Site                                                                         |
|---------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| Buildings and Hardstanding                  | Dominates the Application Site.                                                                              |
| Former Amenity Grassland                    | Located throughout the Application Site in associated with landscaped areas.                                 |
| Poor Semi-improved Grassland                | Located within the north-east corner of the Application Site.                                                |
| Semi-natural Broadleaved Woodland (Offsite) | Delineates the eastern boundary of the Application Site.                                                     |
| Shrub Planting                              | Landscaped areas comprising shrub planting scattered across the Application Site.                            |
| Scattered Trees                             | Located throughout the Application Site.                                                                     |
| Denese and Scattered Scrub                  | Predominantly scattered along the boundaries of the Application Site.                                        |
| Standing Water                              | A small, artificial pond is present within the south-east corner of the Application Site.                    |
| Tall Ruderal Vegetation                     | Predominantly established across former allotments adjacent to the eastern boundary of the Application Site. |
| Ephemeral/ Short Perennial Vegetation       | Scattered patches present across disused car parking areas and hardstanding.                                 |



3.3. Since the original application was approved, all buildings have been demolished and over 50% of properties are either being constructed or occupied. The main green infrastructure assets are considered to be:

- Trees; and
- Habitats of Ecological Value

3.4. The green infrastructure elements are described in the following sections, identifying, and assessing existing or potentially important habitats or species and ecological connectivity corridors.

## Trees

3.5 An Arboricultural Implications Assessment (AIA) was carried out by Steve Ambler & Sons at the time of the original application and has been updated several times since with the most recent update taking place in December 2025. The surveys followed the methodology as set out in the British Standard 5837:2012.

3.6 The original tree survey confirmed that there are several category A trees and groups recorded on the site, equating to approximately 6% of tree cover. This category rating is due to their prominent locations, generally good health and on occasion unusual species.

3.7 The majority of category B trees, which equates to approximately 35% of tree

cover, are larger, more prominent specimens in good condition, or groups which have the potential to provide screening of views into or out of the site (or between parts of it).

3.8 The remaining trees are not considered to be of any particular arboricultural or visual merit; are below the threshold of 75-mm stem diameter when measured at 1.5 metres above ground level or are in poor condition and have been allocated a retention category of C or U. These equate to approximately 42% of tree cover across the site.

3.9. The table below summarises the results of the AIA:

| Retention Category | Key in table | Key in Tree Protection Plan | Numbers Lost to Development | Numbers Retained |
|--------------------|--------------|-----------------------------|-----------------------------|------------------|
| A category         |              | Green crown outline & stem  | 0                           | 9                |
| B category         |              | Blue crown outline & stem   | 19                          | 40               |
| C category         |              | Grey crown outline & stem   | 39                          | 34               |
| U category         |              | 36                          |                             |                  |

### Habitat of ecological value:

3.10 A desk study exercise and Extended Phase 1 Habitat survey was initially undertaken by Tyler Grange in 2015 and subsequently reported by Ecosulis in 2015/2016. To update the ecological baseline and verify the results of previous survey effort, an update Extended Phase 1 habitat survey was undertaken by EDP on 09 May 2019 to inform the development proposals.

3.11 The assessment confirmed that the site is dominated by hardstanding and buildings which are predominantly vacant, in addition to areas of amenity grassland and ornamental shrub planting. The north-eastern corner and eastern boundary of the Development Site is characterised by an unmanaged, tussocky grassland sward with scattered non-native and native trees. There were also scattered trees across the site with some being subject to TPOs.

3.12 It was also confirmed that habitats within and adjacent to the Development Site provide opportunities for bats, breeding birds, badger (*Meles meles*), common reptiles, amphibians and notable mammal species including European hedgehog (*Erinaceus europaeus*).

## Bats

3.13 A ground level assessment of all trees within the site for potential to support roosting bats was undertaken in 2015 and 2019 during which two trees with potential to support roosting bats were identified. All other on-site trees were deemed to have negligible potential to support roosting bats as they lacked any features and were immature to semi-mature.



3.14 Bat activity surveys were also undertaken in 2015 and 2019 with six bat species. Species groups were confirmed to be present foraging and / or commuting within the Application Site.

## Badgers

3.15 No evidence of badgers using the site was identified by surveys in 2015, 2016 and 2019.

## Reptiles

3.16 Reptile surveys undertaken in 2019 which identified slow worm associated with habitat along the north-eastern and eastern boundaries of the Application Site. These areas are predominately represented by tussocky, unmanaged poor semi-improved grassland contiguous with offsite broadleaved woodland and residential gardens.

## **Hedgehogs**

3.17 Hedgehogs were observed at the site by EDP in 2019.

## **4 Inherent Design Measures and Landscape Strategy (Stepwise Approach Stage 2 – Minimise Impacts)**

### **Inherent Design Measures**

4.1 The approach to the original application resulted in the incorporation of a range of 'in-built' mitigation measures into the design of the proposed residential development and associated infrastructure. These are aspects of the design that have been specifically included in the scheme design and are assumptions on which the assessment and resultant additional mitigation have been based.

4.2 This includes the following:

- The construction of the site in accordance with Pollution Prevention Guidelines.
- The translocation of existing trees within the site, where possible.
- The scale of the new dwellings and use of materials.
- The provision of new footway/cycle connections.
- The provision of an electric charging point within the curtilage of each new build dwelling.
- Ascertaining ecological licenses, as required.

4.3 The above measures are in-built features of the approved scheme and serve to mitigate the potential effects on environmental receptors that might otherwise result in significant effects or require additional mitigation measures.

### **Landscaping Scheme**

4.4 The approved landscaping scheme seeks to retain and preserve the best of the existing landscape and trees, knitting these together with newly landscaped areas to create an accessible and varied network of spaces across the scheme and connections to the landscape and townscape beyond.

4.5 The landscape strategy for the scheme seeks to integrate arboriculture, ecology, amenity, and SuDS provision, utilising some of the best existing areas of grassland and glades, improving and extending this character through the informal landscape areas across the site.

4.6 At the heart of the scheme, the gardens forming the historic foreground to the main building will be renovated, reinstating their original formal character and enhancing this space for relaxation and tranquillity. The rugby field area will be 're-

wilded', with significant tree and meadow plantings creating a naturalistic feel while also maintaining a suitably large 'kick-about' space at its centre and providing a new Local Equipped Area for Play at its northern end. In the north east, the scheme seeks to capitalise on the topography and tree cover to create opportunities to enjoy framed views out to the east while also allowing residents to explore the more wooded character of this part of the site.

4.7 The existing vegetation located along the southwestern boundary of the site, adjacent to the site entrance, is proposed for removal as part of the proposed scheme. This vegetation consists mainly of scrub and category C trees. To mitigate the impact of this loss and enhance ecological value, a comprehensive landscaping strategy will be implemented. This will incorporate species rich native planting to improve biodiversity, support local habitats and contribute to the long-term sustainability of the site.

4.8 A number of key principles drive the detailed design of the public realm:

- Better quality trees and shrubs will, where practical and appropriate, be retained or translocated to better locations (work has already been undertaken on this front with the Landscape Architects, Arboriculturist and NCC Tree Officer meeting on site to identify and agree which specimens would be moved);
- The scheme will seek to offer 3 distinct characters of landscaped space – formal, tranquil gardens around the central Listed Building; Informal naturalistic meadows and glades around the old rugby field and the pocket parks between new housing; and a shady wooded hillside trail in the north east;
- Throughout the site carefully selected framed views of the landscape beyond the site will be identified and created, enhancing the scheme's sense of place and the new communities sense of connection to the wider urban area;
- SuDS will be seamlessly integrated with the public open space and offer further biodiversity and aesthetic value through sensitive planting treatments and design;
- Plants will be selected to be suitable for the receiving environment and for micro-climate and soil conditions on site. Wherever possible species of native and/or wildlife value will be used and these will be sourced as locally as possible;
- The whole scheme will be carefully designed to be accessible to all and offer spaces and places at a variety of scales, types and character such that the whole community is catered for and can utilise the site landscape for recreation, exercise and relaxation. This will aim to encourage residents out of their homes, to engage with the landscape and the associated health benefits of doing so and to consider non-vehicular modes of transport for local journeys.



## **5 GREEN INFRASTRUCTURE STATEMENT (Stepwise Approach Stages 3 and 4 – Mitigate and Compensate on site)**

5.1. This statement provides a description of the effects of mitigation of the individual green infrastructure components, with a view to minimising any negative impacts on biodiversity as far as possible. The proposed development results in enhancements over and above mitigation for loss.

### **Trees**

5.2 The trees make an important contribution to the landscape character of the site and the approved scheme proposes to retain as many trees as possible and the proposed s73 does any significant impact on the number of trees retained, with a small group of Category C trees proposed to be removed.

5.3 To mitigate impact on trees, the Landscape Strategy for the site includes mixed native woodland, specimen tree relocation and native hedgerows. A tree translocation exercise has also been undertaken at the site. A qualified arborist/woodland specialist has been appointed to oversee tree works and protection at the site. Additional tree planting proposed as part of this S73 to mitigate for the loss of a group of category C trees.

5.4 Without development the tree stocks remain fully intact, however the management of the tree stocks would likely decline and any structural or health issues go unnoticed and unmanaged, which may shorten the trees life expectancy and provide a risk to those using the site albeit at a lower usage level. Such hazards would also pose a risk to those living in properties adjoining the site or the surrounding highways.

5.5 With development comes the opportunity to invest in further tree planting and management of the existing trees / woodland feature offering opportunities for habitat and amenity gains.

5.6 The design layout shows buffers between the houses, gardens and retained trees. This will reduce the pressures that would otherwise be placed upon these trees by residents.

5.7 Any construction works have the ability to negatively impact on tree health and stability, as their underground parts are frequently ignored, damaged or severed and above ground parts are injured or broken through impact. The protection measures have been implemented at the site.

5.8 The AIA provided a realistic assessment of the probable impact of the proposed development on the trees and vice versa with due allowances for their future growth and maintenance requirements.

5.9 Across the whole site, mitigation for tree loss is provided through significant tree planting proposals, which increase species diversity and the climate resilience of the trees on site. The greater species diversity will add seasonal and biodiversity interest. Tree planting proposed is appropriate to mitigate the level of tree loss.

### **Habitat of ecological value**

5.10 A desk study exercise and Extended Phase 1 Habitat survey was initially undertaken by Tyler Grange in 2015 and subsequently reported by Ecosulis in 2015/2016. To update the ecological baseline and verify the results of previous survey effort, an update Extended Phase 1 habitat survey was undertaken by EDP on 09 May 2019 to inform the development proposals. The updated survey confirms a number of recommendations to mitigate for the impacts on the proposal on biodiversity, as set out below:

- New bat roosting features are incorporated into the proposals. A total of 17 Schwegler bat boxes will be installed upon suitable, mature trees to be retained along the peripheries of the Development Site where appropriate.
- In addition, installation of permanent, compensatory roosting features with newly constructed residential houses comprising 12 Schwegler 1FR bat tubes (or similar) is proposed, in addition to construction of a purpose-built bat loft void provided within a proposed new garage attached to Felthorpe House.

5.11 To enhance bird nesting opportunities across the Site, nest boxes will be installed on retained mature trees and/or buildings as appropriate. A variety of new nest boxes are proposed to accommodate different bird species and include:

- Schwegler 1B nest boxes with 26mm holes for blue tit and coal tit;
- Schwegler 2M nest box with 32mm hole, used by great-, blue-, marsh-, coal- and crested tit, redstart, nuthatch, collared and pied flycatcher, wryneck, tree, and house sparrows, and occasionally bats;
- Schwegler 3S nest boxes for starling;
- Swift bricks of swift boxes (e.g., Schwegler No 16. Swift Box);
- House sparrow nest box; and/or
- House martin nest box.

5.12 To enhance the Site for a common reptile population, hibernacula will be constructed within grassland habitat to be retained within the north-east corner of the Site.

5.13 A bat friendly lighting plan is also proposed along with proposed planting will provide habitat connectivity.

5.14 Hedgehog friendly fencing is proposed through the development. This will allow the passage of small animals across the development site.

### **Conclusion**

5.15 This Green Infrastructure Statement demonstrates how stepwise approach has been applied to the green infrastructure across the site. Through this approach new benefits for biodiversity has been achieved.