



Green Infrastructure Statement

Proposed new vehicle access to serve existing
commercial operation at GD Environmental Ltd,
Nash Road Yard

Client: GD Environmental Ltd

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1 Introduction

1.1 Introduction

This statement has been prepared by Richard Green Ecology Ltd on behalf of GD Environmental Ltd. It sets out the proposed green infrastructure enhancements at Nash Road Yard, (OS Grid Reference ST 34036 86001), hereafter referred to as ‘the Site’. See Figure 1-1 for the red line boundary and the wider landscape context.



Figure 1-1. Aerial image of the Site (red circle) in the context of the surrounding landscape

1.2 Purpose and planning policy

Planning Policy Wales, Chapter 6, requires a green infrastructure (GI) statement to be submitted with all planning applications, which describes how green infrastructure has been incorporated into the development proposals.

Planning Policy Wales (PPW) 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. At the landscape scale, green infrastructure can comprise entire ecosystems such as wetlands, waterways and mountain ranges. At a local scale, it might comprise parks, fields, public rights of way, allotments, cemeteries, and gardens. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks.”*

Paragraph 6.2.14 of PPW recommends for GI statements that, *“Development proposals should be informed by the priorities identified in green infrastructure assessments and locally based planning guidance. The Building with Nature standards represent good practice and are an effective prompt for developers to improve the quality of their schemes and demonstrate the sustainable management of natural resources. Using these standards in a way which is proportionate to the nature and scale of the development proposed will be a useful way of ensuring appropriate consideration in circumstances where there is an absence of a green infrastructure assessment and planned approach or relevant local or Supplementary Planning Guidance. The standards are underpinned by an accreditation system and whenever possible, accreditation under these standards should be pursued.”*

Natural Resources Wales (NRW) has developed a framework for evaluating ecosystem resilience based on five attributes and properties specified in the Environment (Wales) Act. This is referred to as DECCA: Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience.

The attributes provide a framework for considering the state of ecosystem resilience in Wales and can be applied across different habitats and land uses and for a range of different scales. NRW works to the definition of ecosystem resilience published in its State of Natural Resources Report in 2020, which is: *“An environment that can respond to pressures by resisting, recovering or adapting to change; and is able to continue to provide natural resources and benefits to people.”*

When assessing planning applications, Planning Policy Wales instructs planning authorities to take account of and promote the resilience of ecosystems, in particular the five attributes of ecosystem resilience.

The purpose of this statement is to provide an overview of the existing habitats on the Site and their condition; full details can be found in the Ecological Impact Assessment (EclA) produced by Richard Green Ecology in February 2024. The statement also details potential development impacts (in the absence of mitigation) and proposed biodiversity enhancements, and how they fit within the DECCA Framework and Building with Nature standards.

The statement has been produced in accordance with requirements outlined in Chapter 6 of Planning Policy Wales (PPW), which can be summarised as follows:

- **Green Infrastructure (GI):** stronger emphasis on taking a proactive approach to GI, covering cross boundary considerations with the submission of a proportionate GI statement with planning applications.
- **Net Benefit for Biodiversity and the Step-wise Approach:** further clarity is provided on securing net benefit for biodiversity through the application of the step-wise approach, including the acknowledgement of off-site compensation measures as a last resort, and, the need to consider enhancement and long-

term management at each step. The use of the green infrastructure statement as a means of demonstrating the stepwise approach is made explicit.

- **Protection for Sites Of Special Scientific Interest:** strengthened approach to the protection of SSSIs, with increased clarity on the position for site management and exemptions for minor development necessary to maintain a 'living landscape'.
- **Trees and Woodlands:** closer alignment with the stepwise approach, along with promoting new planting as part of development based on securing the right tree in the right place.

2 Green Infrastructure Statement

2.1 *Site location*

The Site is located to the south-east of Newport within an area of industrial estates, agricultural land, and woodlands. The area is interspersed by a network of reens (drainage ditches) and hedgerows, which connect the Site to the wider landscape (refer to Figure 1-1).

The Site is:

- within a Natural Resources Wales (NRW) Lowland Wetland Priority Area;
- approximately 300 from Solutia Site – Site of Importance for Nature Conservation (SINC), a series of improved and semi-improved grasslands with traditional ditches and ponds that supports a range of species, including nesting birds such as Cetti's warbler *Cettia cetti*, and invertebrates, including hairy dragonfly *Brachyton prantense*; and
- located approximately 1 km north of Gwent levels Site of Special Scientific Interest (SSSI) – Nash and Goldcliff sections, designated for its extensive areas of reclaimed wet pasture, which is the largest of its kind in Wales. The SSSI reens are rich in plant species and communities, including rare plant species, and nationally rare and notable invertebrates.

2.2 *Site baseline*

South East Wales Biodiversity Records Centre (SEWBReC) provided data on designated sites and protected and notable species records within 2 km of the Site, and extended UK Habitat Classification survey, otter, water vole and invasive non-native plant species surveys were undertaken on 6th February 2024. Great crested newt eDNA survey of the reen was undertaken in May 2023.

The site comprises a short section of open reen between an industrial site and a road. At the time of the survey, vegetation within and either side of the reen showed evidence of recent and regular maintenance.

Photographs of the Site taken in February 2024



2.3 *Development impacts*

It is proposed to construct a new vehicle access to serve the existing commercial operation. The access would involve culverting an existing reën between the industrial site and the road (refer to Drawing 1 and extract).

In the absence of mitigation, the proposal has the potential to impact the Solutia Site SINC and any amphibians in the reën via pollution of the reën during construction and via run-off during the operational phase.

The proposal would result in the culverting of a 6-8 m length of reën and loss of adjacent vegetated banks, destroying a short section of water vole habitat on each bank and potentially severing water vole habitat and territory. The proposal could also cause any otters travelling along the reën to exit the reën to cross over the culvert, potentially causing them to cross the adjacent road and putting them at risk of road traffic mortality. Grass snakes could also be affected if the culvert provides a barrier to their movement along the reën.

2.4 *Net benefit for biodiversity and the step-wise approach*

The Proposed Development seeks to follow the step-wise approach, as detailed within Chapter 6 of PPW, as follows.

1. **Avoid:** The culvert will be a box culvert, spanning the width of the reën and providing a minimum of 200 mm headroom above the maximum reën water level, so that wildlife can safely cross under the access road through the reën, avoiding severance of habitats for water vole, otter, amphibians and grass snake. The construction area will be limited to the red line boundary (RLB), avoiding impacts to habitats and species outside the RLB. Pollution of the reën will be avoided by careful and considerate construction methods, following best practice for pollution prevention of watercourses during construction. Pollution of the reën will be avoided during operation, as the access will include kerbs preventing any drainage run-off entering the reën.
2. **Minimise:** The footprint of the proposed access has been minimised, given constraints such as the required turning arc and visibility splay. The working area will be limited to the RLB.
3. **Mitigate:** The culvert has been designed to allow passage of semi-aquatic wildlife beneath it, i.e., by providing a minimum of 200 mm headroom above the maximum reën water level, allowing wildlife to swim through it without fully submerging. Because water voles and their burrows are protected, a licence will be required for the proposed work from Natural Resources Wales. A working method for water vole displacement is included in Appendix D of the EclA report. This will be subject to NRW licensing and ecological supervision. Vegetation clearance prior to construction will be done under ecological supervision as part of a NRW water vole licence. The ecologist will also search for any grass snakes present and relocate them out

of the construction area. Once vegetation has been cleared, grass snakes are unlikely to return to the area until after construction is complete. Management of marginal and bankside vegetation will be sympathetic to the needs of water voles (see 4. **Compensate**).

4. **Compensate:** Marginal and bankside vegetation along the length of the reen in front of the GD Environmental site will be left unmanaged, or only managed occasionally if there is an overriding need, such as highway maintenance, to enhance habitat for water voles and other wildlife, i.e., provide more cover and foraging opportunities.

The Proposed Development has recognised the need to achieve a Net Benefit for Biodiversity from the outset; this has been built into the planning of the project – by avoiding impacts outside of the site, which has been minimised in its extent; and by avoiding severance of habitats for wildlife using the reen. Mitigation measures will be undertaken to sensitively displace water voles under NRW licence, and marginal and bankside habitats along the reen will be improved for wildlife through sensitive management.

2.5 **DECCA Framework**

The proposed ecological enhancements fit with the DECCA Framework by:

1. Increasing **diversity** within the local ecosystem by providing enhanced reen bankside and marginal habitats, i.e., by reducing vegetation clearance/management.
2. Increasing the **extent**/ scale of ecosystems by providing enhanced reen bankside and marginal habitats, as above.
3. Improving the **condition** of the reen by providing enhanced reen bankside and marginal habitats, as above.
4. Improving **connections** within and between ecosystems by maintaining wildlife passage along the reen and improving its value as a wildlife corridor by providing enhanced reen bankside and marginal habitats, as above.
5. Improving ecosystem **resilience** and adaptability to future pressures by providing enhanced reen bankside and marginal habitats, as above (providing better habitat for wildlife along the reen, increasing availability of habitat for wildlife in the area) and the management of surface water runoff through drainage design.

2.6 **Building with Nature Standards**

The proposed green infrastructure contributes to the Building with Nature Standards as follows:

Core 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 existing and planned for green infrastructure in the surrounding area.

The enhanced reën marginal and bankside habitats will improve the value and functionality of the reën as a wildlife corridor along the frontage of the site, increasing habitat diversity for a number of species. As well as providing better wildlife habitat, the reduced vegetation management will assist with carbon sequestration and protection of the reën by natural vegetation filtration of any surface water run-off from the adjacent road.

Core 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. The green infrastructure is designed to promote low carbon behaviours and contributes to achieving zero carbon development by optimising carbon sequestration and demonstrating low carbon approaches to design, construction and long-term maintenance.

The reduced management of bankside and marginal vegetation will result in a reduction in fuel use and carbon generation associated with the mechanical cutting of vegetation. Allowing vegetation to grow taller will also result in more carbon sequestration. Taller vegetation will also act to shade the water in the reën, keeping it cooler and maintaining higher dissolved oxygen levels, resulting in better water quality and improvements for aquatic wildlife.

Core 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. In addition, it delivers environmental net gains, including improving air and water quality and wherever possible includes quiet spaces for people and wildlife.

The proposed development will have no significant impacts on air or soil quality and noise generation will be minimal. The footprint of the development has been minimised and proposed habitat enhancements along the reën will improve water quality (see above) and provide better visual amenity along the road, within an industrial environment.

Core Standard 4: Champions a Context Driven Approach – The green infrastructure positively responds to the local context, including the physical environment, such as landscape and urban character and social, economic and environmental priorities, including the evidenced needs and strengths of existing and future local communities.

The proposed habitat enhancements along the reën will improve natural habitats within an industrial landscape, softening the contrast between the industrial estate

and adjacent habitats and bringing more wildlife into the area, improving social connection with nature.

Core 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 reen is heavily managed and provides limited wildlife habitat. The reduction in vegetation management and enhancement of habitats along it will serve to make an attractive 'feature' of the reen along the Nash Road Yard frontage. I.e., the habitat and landscape value of this landscape feature of local cultural significance (given connections to the Gwent Levels) will be improved and the reen will be viewed as a social and wildlife asset rather than a forgotten and abused drainage channel.

Core Standard 6: Secures Effective Place-keeping - The green infrastructure is subject to management arrangements that demonstrate a commitment to effectively implement, establish and maintain features at all stages of the development process. This should include details of funding, governance, maintenance, monitoring, remediation and, where appropriate, community involvement and stewardship.

The reen will be maintained by the site owner and operator to fulfil and maintain its wildlife value and objectives. This could be secured by way of a planning condition if necessary.

Wellbeing Standard 7: Brings nature closer to people – The green infrastructure is close to where people live, work, learn, play and/or visit and is designed to optimise use and enjoyment for everyone across the year, to maximise health and wellbeing outcomes and to promote active living for existing and future communities.

The reen along the Nash Road Yard frontage will be experienced by the passing public, contributing to the sense of wellbeing afforded by green spaces/features. The connectivity of the reen with surrounding habitats will enhance the overall resilience of wildlife and their habitats, indirectly benefitting local people.

Wellbeing 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.

As for Standard 7, above, the increased resilience of wildlife and habitats will indirectly benefit all local people, including any vulnerable or excluded groups.

Water Standard 9: Delivers Climate Resilient Water Management - The green infrastructure is integral to sustainable drainage using above ground features to manage flood risk, maintain the natural water cycle and improve water quality within the boundary of the project and at a catchment scale. The green infrastructure

is designed to be drought resistant and wherever possible, includes measures for the retention and reuse of rainwater.

As explained above, the taller vegetation along the reen will improve water quality and the sensitive management of the reen will make it a valued feature for people and wildlife.

Water Standard 10: Brings Water Closer to People - The green infrastructure is designed to integrate water, including areas of standing water, flowing water, seasonal and ephemeral features, to bring additional amenity and wildlife benefits.

See the responses to Standards 7, 8 & 9.

Wildlife Standard 11: Delivers wildlife enhancement – The green infrastructure optimises long term and climate resilient net benefits for nature, by retaining and enhancing existing ecological assets and creating locally relevant new habitats within the boundary of the project. Wildlife measures are secured at all stages of implementation and where applicable, across multiple phases of development.

See responses to Standards 1, 2, 4 & 7.

Wildlife Standard 12: Underpins nature's recovery – The green infrastructure creates effective links with existing and planned for ecological features and networks beyond the boundary of the project to support the creation and restoration of resilient ecological networks in the wider landscape.

The reen connects with the Solutia Site SINC, providing a buffer and additional adjoining habitat. It is also within a NRW Lowland Wetland Priority Area and connected via other GI with the Gwent Levels SSSI. The enhancement of wildlife habitats on the Site will contribute to the overall resilience of wildlife in the wider landscape.

2.7 Conclusion

Overall, there will be ecological enhancement and biodiversity net gain by integrating green infrastructure into the development proposals. The development will protect and enhance the reen ecosystem along the boundary of the Nash Road Yard, providing more diverse habitats and species, and allowing them to adapt to change. The plans will also enhance the green infrastructure alongside the Nash Road Yard in a way that increases resilience to the changing climate and provides protection for people and places.

It is therefore concluded that, because of proposed sensitive management of the reen, improving its value for water voles and other wildlife, there will be a demonstrable net benefit for biodiversity. The Site has been identified as being relatively low ecological value, with onsite and immediately offsite impacts appropriately avoided and mitigated for. All habitats either retained, created or enhanced will be subject to long-term management.

Drawings

Drawing 1 – Proposed Plan, with enlarged extract overleaf



