
Green Infrastructure Statement :

Location: Land adjacent to the River Ebbw – At Jubilee Park:
between the footbridge and Rogerstone Welfare Ground

Introduction:

This statement has been produced in accordance with national guidance;
Planning Policy Wales Ed12 July 2024:

Green Infrastructure and Development

6.2.11 The quality of the built environment should be enhanced by integrating green infrastructure into developmentinformed by an appropriate level of assessment.....

6.2.12 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.....

6.2.13 There are multiple ways of incorporating green infrastructure, depending on the needs and opportunities a site presents..... In most cases the green infrastructure statement should highlight any baseline data considered and surveys and assessments undertaken,.....

The updated National Planning Policy in Chapter 6 of Planning Policy Wales is clear that the statement should be proportionate to the size of the development in terms of its scope and contents to demonstrate how the Green Infrastructure (GI) proposals follow the step-wise approach and to describe how GI has been incorporated into the proposal. Chapter 6 does not appear to necessarily require a separate document entitled 'Green Infrastructure Statement' but it rather requires a statement to demonstrate how the Green Infrastructure (GI) proposals follow the step-wise approach and to describe how GI has been incorporated into the proposal.

The PEA includes pre-application survey, research and data searches to establish the baseline state of biodiversity and ecosystem resilience on site. It sets out that the 'Stepwise Approach' to maintaining biodiversity has been followed as part of the site appraisal and design evolution of the scheme. It goes on to set out the approach to biodiversity enhancement, identifies precautionary measures needed to protect the river and a series of mitigation measures.

The 'Stepwise Approach' to maintaining biodiversity has been followed as part of the site appraisal and design evolution of the scheme and it is considered that

the requirements as set out in the new Chapter 6 have been fulfilled by the PEA Statement and landscaping proposals submitted with the application but, notwithstanding that, this additional statement has been produced for further clarification.

No site clearance works have taken place prior to the design appraisal of the site.

Green Infrastructure Statement:

The purpose of this statement is demonstrate how the Green Infrastructure (GI) proposals follow the step-wise approach and to describe how GI has been incorporated into the proposal by; identifying the existing GI which is to be retained and specifying the proposed GI which the development intends to incorporate as an enhancement to overall benefit local biodiversity.

Section 4.0 of the PEA includes a data search for species recorded within 2km of the site, details of locally important wildlife sites within 500m of the site, details of nationally important wildlife sites within 2km and sites designated specifically for bats within 10km.

No SSSI or SACs were identified within 2km of the site and none specially designated for bats lie within 10km of the site. The River Ebbw is a designated locally important wildlife Site of Importance to Nature Conservation (SINC).

The application site is a collapsed river bank and whatever GI was present has been washed away.

The step-wise approach, as set out in paragraph 6.4.15 of Chapter 6, requires that any adverse environmental impacts are first avoided, then minimized, then mitigated, and as a last resort compensated for on-site, or offsite.

It is usual to carry out surveys to identify an ecological baseline and from that identify any harm caused by the development and the value of any proposed enhancements. However, this development is somewhat unusual in that any ecological damage and loss of habitat has already occurred as a result of a natural event; with the 'development' limited to restoring the damaged river bank and protecting it from further erosion. It should therefore be considered that the existing situation forms the GI baseline rather than the situation prior to the erosion; with the application seeking to enhance and restore the site.

In this case there was a singular lack of flora and fauna within the site, with the PEA failing to identify any wildlife habitats within the site and only identifying a small Sycamore on the edge of the bank and a small Alder at the back of the footpath standing against the flood wall. In the event of further erosion both the Alder and Sycamore will likely be lost.

The existing landscaping is therefore proposed to be improved as part of the development, as set out in the Proposed Site Layout Plan (Ref: 17957_501 r07),

the Proposed Sections (Ref: 17957_504_r07), the Works Specification and Method Statement. The Planning Statement and proposed site layout plans, as informed by the 'Stepwise Approach' demonstrates how the development will be carried out.

PPW para 6.4.12 is clear that any enhancement must be proportionate to the '*scale and nature of the development*.' In this case the development may result in the loss of 2 trees that will likely be lost in the future if the development is not permitted. It is considered that as such there should not be a significant requirement for ecological enhancement.

The reinstated river bank is not suitable for planting new trees but, nonetheless, the development does include a net biodiversity benefit. The PEA identifies a positive ecological impact as the bags and mattresses will provide micro habitats for aquatic plants and invertebrates both below and above the water and sediment trapping will have a localised water quality benefit.

In addition the PEA sets out a number of on-site and offsite biodiversity enhancements:

- seeding the turf matting with a wildflower mix
- installing bird and bat boxes at the recreation grounds
- planting a 5m x 5m area native species grassland
- planting 3 x crab apple trees
- the removal of non-native invasive plant species to surrounding areas along the river bank (already taken place with treatment along the riverbank adjacent to the Recreation Ground).

In terms of any impacts beyond the site boundaries, the PEA recommends a number of precautionary, mitigation and protection measures (pages 42-44). These include oversight by an ecologist, timing works to protect migratory fish, nesting birds and other breeding wildlife, any lighting to minimise wildlife impact and management of material/equipment storage.

Therefore it is submitted that the reinstatement of the bank, the proposed landscaping, in addition to the offsite enhancements and precautionary measures set out in the PEA, includes mitigation and on site compensatory measures that together clearly result in a biodiversity net gain that is in accordance with local and national planning policy.