

Green Infrastructure Statement

Inert Material Recovery Facility, Sluice
Farm, Broad Street Common, Peterstone,
Wentlooge, CF3 2TN

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1. Introduction

Overview & Legislative Requirement

This Green Infrastructure Statement has been prepared to accompany and support an application seeking planning permission for the retrospective change of use of a livery yard and associated buildings to an inert material recovery facility, including an engineering fabrication unit.

Planning Policy Wales (PPW) (Edition 12, February 2024) requires that all planning applications are accompanied by a Green Infrastructure Statement that is proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal.

Purpose & Statement Structure

The purpose of this statement is to provide an overview of the existing habitats on the site and their condition; potential development impacts (in the absence of mitigation) and proposed biodiversity enhancements. The remainder of the statement is, therefore, structured as follows:

- **Section 2** provides a description of the site, its context, the proposals and ecological baseline;
- **Section 3** sets out the policy context relevant to the proposals;
- **Section 4** justifies the extent of green infrastructure proposed; and
- **Section 5** provides an overview and concludes this statement.

2. The Site & Proposals

Site Address

Sluice Farm, Broad Street Common, Peterstone, Wentlooge, CF3 2TN.

Site Context

The application site extends to 0.98 hectares and is located off Wentlooge Avenue, to the east of Cardiff, although it falls administratively within the jurisdiction of Newport City Council. The site lies approximately 5 miles east of Cardiff City Centre and occupies a transitional position between urban edge development and the open agricultural landscape of the Gwent Levels.

The surrounding land use is characterised by predominantly flat, low-lying agricultural fields typical of the Gwent Levels. However, the immediate context is influenced by existing built development. Notably, there is established commercial and industrial built form adjoining the western boundary, as well as further development on the opposite side of Wentlooge Avenue. This existing pattern of development reduces the site's sensitivity in landscape and visual terms and establishes a precedent for appropriately scaled employment or infrastructure uses in this location.

The southern boundary of the site is defined by Wentlooge Avenue and the Rhosog Fawr Reen, while Tarwick Reen runs along the western boundary. These reens form part of the historic drainage network characteristic of the Gwent Levels and provide hydrological connectivity to the nearby Severn Estuary, located approximately 450 metres to the south. Both reens ultimately discharge into the estuary via controlled outfalls incorporating sluices and culverts within the coastal flood defence system.

The site lies within the wider setting of the Peterstone and Wentloog Site of Special Scientific Interest (SSSI). However, it is important to note the application site itself falls outside the designated boundary and is not subject to statutory ecological designation. While the Severn Estuary holds multiple international and national environmental designations, including SSSI, Special Area of Conservation (SAC), Special Protection Area (SPA), and Ramsar status, the site is

	physically separated from these designations by existing flood defences, intervening land uses, and drainage infrastructure. In this context, the site can reasonably be considered as part of a developed fringe within the wider Levels landscape, where careful design, environmental controls, and mitigation measures can ensure that development does not give rise to unacceptable impacts on surrounding sensitive receptors.
Site Description & Operations	The site is currently in use as an inert material recovery facility (MRF), reflecting the retrospective nature of the proposals. Historically, the site operated as a livery yard. Ground levels across the site generally fall in a south-easterly direction. Elevations range from approximately 7.53m AOD at the central northern boundary to around 4.2m AOD at the south-eastern edge, which represents the lowest point on the site. Access to the site is provided via two entrances from Wentlooge Avenue. The eastern access serves staff and visitors, while the western access is designated for heavy goods vehicles (HGVs) associated with waste management operations. The eastern entrance leads to a secure parking area, monitored by CCTV, used for staff and visitor vehicles as well as overnight HGV parking. Adjacent to this is the yard office, where all visitors and contractors must report for induction. Nearby facilities include workshops, a storage building for plant and equipment, and a COSHH store housed within a modified shipping container designed to safely contain spills and ventilate hazardous gases. The main office building, which includes administrative offices, a canteen, and a conference room, is also located in this area. The western access leads directly to the operational waste management area. Waste deliveries are received at a weighbridge, where consignments are weighed, inspected, and logged using waste logics software, supported by an AI-powered camera system for identifying non-compliant materials. Vehicles are then directed to appropriate tipping areas, primarily within the MRF building. Inside the MRF, waste is deposited in a tipping bay and undergoes further assessment. Bulky items and specialist wastes are removed to designated quarantine bays. Remaining materials are processed through a trommel to separate inert fractions, followed by manual segregation along a picking line into various waste streams. These materials are stored in bins or bays constructed from interlocking concrete blocks before being removed from site or temporarily stored. The following waste management services are undertaken: ▪ Skip / bin hire, for the disposal of domestic, commercial and industrial wastes, from private and business clients. These are generally mixed waste streams but skips / bins for segregated wastes are also provided. ▪ Uplift of skips / bins, assessment of wastes contained therein. ▪ Tipping of mixed wastes within the MRF building at the site, removal of bulky and non-compliant items. Screening to remove inert materials and then picking to segregate wastes into their relevant waste streams. ▪ Re-packaging segregated wastes streams for removal from site for on-going treatment, recovery or disposal. ▪ Transport of segregated wastes to facilities permitted to receive them. ▪ Inert materials are bulked up in size fractions and then removed to facilities which are able to process them into recycled aggregates and soils.

	Surface water management is carefully controlled. Runoff within the MRF is collected and stored in a sealed tank for testing and off-site disposal. Rainwater from the building roof is harvested for dust suppression, with excess directed to a soakaway. Elsewhere on site, runoff is channelled through drains and gullies to an attenuation pond, where solids settle before water passes through a hydrocarbon separator and is discharged. To the west of the MRF lies an inert waste storage and processing area. This is a stone-surfaced yard with underlying geotextile, where inert materials are sorted, processed, and either reused on-site or exported as recycled aggregates.
The Proposal	The development comprises the retrospective change of use of a former livery yard, together with its associated buildings, to an inert material recovery facility (MRF), including the provision of an engineering and fabrication unit. As part of the site's redevelopment, a series of soil bunds have been formed to enclose and define the waste management compound. A purpose-built MRF building has been constructed toward the rear of the site to provide weather protection for the sorting and segregation of materials. In addition, an attenuation pond has been created, and supporting drainage infrastructure has been installed, including a full retention hydrocarbon separator to manage surface water runoff. A separate application has been submitted to Natural Resources Wales (NRW) seeking an environmental permit to accept household, commercial, and industrial inert wastes at the site. The proposed operational limits are as follows: - Domestic, commercial and industrial waste: Up to 75,000 tonnes/year and not more than 1,000 tonnes per day - Treatment of waste to produce soils, soil substitutes, and aggregates: up to 2,000 tonnes per day and not more than 5,000 tonnes at any one time. The permit application is currently pending determination.
Ecological Baseline	The application site comprises an area of previously developed land, bordered by rural grassland habitat on all sides. Tarwick Reen is situated within 20m of the site's western boundary. The site is also situated within the Rhymney and Peterstone SSSI; despite the exclusion of the pre-developed land from the SSSI designation, some areas within the works site will abut the surrounding SSSI (this adjoining land has previously been used for agriculture, most recently the grazing of horses). The on-site habitat largely comprises bare ground and hardstanding, with patches of scrub and semi-improved grassland and ruderal vegetation along the edge of Tarwick Reen. It is currently used as a waste management site. The habitat at the northern extent of the site comprises bramble scrub, with a large patch of grassland present to the north-east. Some mature trees are present on the peripheries of the site.
3. Planning Policy Context	
Future Wales (The National Plan)	Future Wales – The National Plan 2040 (February 2021) sets the direction for development across Wales to 2040. It constitutes a national development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, and improving the health and well-being of communities. Decarbonisation, health, prosperity and the Welsh language are common threads underpinning all Future Wales policies.

	Policy 9 (Resilient Ecological Networks and Green Infrastructure) seeks to ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure as part of development proposals. The policy states “...the Welsh Government will work with key partners to: ▪ identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and ▪ identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being. Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, 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	The Welsh Government issued an update to Chapter 6 of PPW on 11 October 2023 covering green infrastructure, net benefit for biodiversity, the protection afforded to Sites of Special Scientific Interest and trees and woodlands. These changes were published in an annex to Chapter 6 and have been included in a consolidated version of PPW (Edition 12). Planning Policy Wales 12 sets out a range of policies to maintain and enhance biodiversity, promote the resilience of ecosystems, including the stepwise approach, and to maximise the provision of green infrastructure. Paragraph 6.2.12 of PPW states that a Green Infrastructure Statement is an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (Paragraph 6.4.15 of PPW) has been applied. Step 1 (Avoid) – The primary focus of planning authorities is to prevent harm to biodiversity and ecosystem functioning by considering a wide range of species and habitats. They must ensure that any potential environmental damage is minimised by thoroughly evaluating alternative sites and design options that would cause less harm or provide benefits. Step 2 (Minimise) – When all possible options for avoiding harm to biodiversity have been explored, applicants must collaborate with planning authorities to minimise the initial impact on biodiversity and ecosystems. Step 3 (Mitigate) – When efforts to minimise the impact on biodiversity and ecosystems have been exhausted and there's still potential for damage or loss, the proposed development must include mitigation measures. These measures should limit the negative effects of the development by repairing damaged habitats and species disturbances, aiming to restore beyond a like-for-like level considering disturbance and recovery time. The goal is to enhance ecosystem resilience both on the site and, where feasible, in the surrounding area. Step 4 (Compensation) – When all the steps above have been exhausted, and where modifications, alternative sites, conditions or obligations are not sufficient to secure biodiversity outcomes further on-site/immediately proximate, as a last resort off-site compensation for unavoidable damage must be provided.

The Well-being of Future Generations Act (2015)	The Well-being of Future Generations Act (2015) aims to promote the well-being of both current and future generations. It represents a shift towards a more sustainable and long-term approach to governance, focusing on economic, social, environmental, and cultural well-being. The Act requires public bodies in Wales to consider the impact of their decisions on these well-being goals and to work towards achieving them. It establishes a set of well-being objectives, such as a prosperous Wales, a resilient Wales, a healthier Wales, a more equal Wales, a Wales of cohesive communities, and a Wales of vibrant culture and thriving Welsh language. The Act encourages collaboration between public bodies, communities, and stakeholders to ensure effective green infrastructure provision. This collaborative approach fosters innovation, knowledge sharing, and community engagement in designing and implementing green projects that benefit both current and future generations.
Environment Wales Act (2016)	This legislation is intended to work alongside the Well-being of Future Generations Act. It includes a new biodiversity duty to reverse the decline of biodiversity and to secure long-term resilience. Section 6 states <i>“A public authority must seek to maintain and enhance biodiversity... and in so doing promote the resilience of ecosystems”</i>. In relation to resilience of ecosystems, the following should be taken into account: a) diversity between and within ecosystems; b) the connections between and within ecosystems; c) the scale of ecosystems; d) the condition of ecosystems (including their structure and functioning); e) the adaptability of ecosystems.
Active Travel (Wales) Act (2015)	The Active Travel (Wales) Act (2015) set out that Welsh ministers must publish annual reports on the amount of active travel journeys made in Wales. There is also a requirement for Local Authorities to identify and plan for active travel routes and increase the provision for walking and cycling, and encourage users to rely less on cars. Local highway authorities are required to give greater consideration to the requirements of walkers and cyclists and provide greater infrastructure provision to them. The act also highlights the need to build connections between key sites such as workplaces, hospitals, schools and shopping areas with active travel routes.
Newport Local Development Plan	At the local level, the Newport Local Development Plan (LDP), adopted in January 2015, sets out a framework of land allocations and development management policies against which all planning applications are assessed. Policy SP1 (Sustainability) is of particular relevance, as it seeks to conserve, enhance and connect green infrastructure networks across the authority area, ensuring the protection and enhancement of both the natural and built environment. The policy promotes an integrated approach to green infrastructure, recognising its role in delivering multiple benefits including biodiversity enhancement, climate resilience, landscape character, water management, and amenity value for local communities. While the LDP supports appropriate development, proposals are required to make a positive contribution to sustainable development, including prioritising the reuse of previously developed (brownfield) land. The supporting text to Policy SP1 highlights that, as the planning system is fundamentally concerned with land use, a key mechanism for achieving sustainable development is the effective reuse of land that has already been developed, alongside making efficient use of existing infrastructure, services, and facilities, rather than encroaching on undeveloped greenfield sites.

	In this context, the emphasis on brownfield redevelopment aligns with green infrastructure objectives by helping to safeguard existing greenfield land and ecological networks from unnecessary loss or fragmentation. Development proposals are therefore expected not only to avoid harm to green infrastructure assets, but where possible to deliver enhancements, such as improved habitat connectivity, sustainable drainage systems, and multifunctional green spaces, that strengthen the wider green infrastructure network.
4. Green Infrastructure Strategy	
Existing Assets	The Applicant acknowledges that Section 6 of the Environment (Wales) Act 2016 sets out that planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions and, in so doing, promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions. This means the site operations should not cause any significant loss of habitats or populations of species, locally or nationally and ideally should provide a net benefit for biodiversity. This statement has been informed by a site walkover undertaken to identify existing green infrastructure within the site and its surroundings. <u>Ecology</u> An ecological walkover survey of the site was undertaken by EcoVigour who have since prepared a Preliminary Ecological Appraisal. This identifies two statutory designated sites within 2km of the site boundary. The Severn Estuary is a designated SSSI, RAMSAR, SPA and SAC, situated approximately 205m to the south of the works site. The Gwent Levels (Rhymney and Peterstone) SSSI surrounds the site on all sides. <u>Existing Green Infrastructure</u> ▪ The site largely comprises bare ground and hard standing, with patches of scrub and semi-improved grassland. ▪ Scrub and small trees are present around the sites eastern and western boundaries. ▪ Multiple spoil piles are present throughout the central area of the site, largely comprising rubble and concrete, and soil bunds are also frequent throughout the site. ▪ The habitat at the northern extent of the site comprises bramble scrub, with a large patch of grassland present to the north-east. ▪ There are two known watercourses within 500m of the work. The Rhosog Fawr Reen runs through the southern boundary of the works site, and Tarwick Reen is present approximately 8m to the west. Both of these reen systems feed into the Severn Estuary SSSI.
Enhancement and Mitigation Measures	<u>Enhancement Measures (Biodiversity & Environmental Gains)</u> ▪ A landscaped ecological screening bund has been established along the site's western boundary adjacent to the weighbridge. This bund has been planted with a diverse mix of native scrub species to provide habitat connectivity, visual screening, and biodiversity enhancement. ▪ A purpose-built attenuation pond (approximately 4.5m x 45m x 1.2m deep) has been installed as part of the site's sustainable drainage system. The pond is lined with an impermeable HDPE liner and overlain with a 150mm sacrificial soil layer to facilitate colonisation by aquatic and marginal vegetation, thereby enhancing ecological value. ▪ A full-retention hydrocarbon separator has been installed at the attenuation pond outfall to improve water quality entering Tarwick Reen, indirectly supporting aquatic habitats.

- Daily litter picking regimes, including the use of specialist equipment (e.g. long-handled litter pickers and kayak access to reens), will improve environmental quality both on-site and in adjacent habitats.

Avoidance Measures (Preventing Impacts from Occurring)

- A minimum 5m exclusion buffer will be maintained around any active bird nests. No vegetation clearance or heavy machinery operations will occur within this buffer until nesting is complete and young have fledged.
- Refuelling within 10m of reens is strictly prohibited to avoid contamination of watercourses.
- All fuels, oils, and chemicals will be stored securely within a designated COSHH store to prevent accidental release.
- Lighting design avoids unnecessary illumination, including the use of downward-directed, flat-glass LED fittings and PIR-activated security lighting to minimise light spill.
- During peak bat activity periods (summer months), external lighting will not be used for one hour either side of sunrise and sunset.
- Site protocols prohibit leaving materials unsecured, undertaking unnecessary night works, or allowing debris to accumulate.
- All drainage infrastructure is designed to prevent runoff, soil, or debris from entering adjacent reens or sensitive ecological sites (including nearby SSSI land).

Mitigation Measures (Reducing Environmental Impacts)

- All waste tipping, sorting, and processing activities will take place within a fully enclosed Materials Recovery Facility building to minimise dust, particulates, and wind-blown debris.
- Dust suppression measures will be implemented during screening and processing operations using integrated plant systems and/or water sprays.
- A hydrocarbon separator is installed to treat runoff from trafficked areas, preventing contaminated discharge to nearby watercourses.
- Refuelling operations are controlled to minimise pollution risk, including maintaining a minimum 10m stand-off from reens and restricting refuelling to trained personnel using appropriate PPE.
- Spill response infrastructure is provided, including a 120L spill kit and additional absorbent materials stored on site.
- Plant nappies are used beneath static plant, refuelling points, and chemical containers to capture leaks and drips.
- All surface water drainage is designed to direct runoff away from sensitive receptors such as adjacent reens and designated sites.
- Daily inspections of plant and vehicles will identify and address oil or fuel leaks promptly.

Precautionary Measures (Good Practice & Risk Management)

- The bulk diesel tank is double-skinned with integrated bunding and located within a secure COSHH store featuring a sealed sump base to contain spills.
- All associated pipework, valves, and dispensing equipment are enclosed, with controlled access managed by the Yard Manager.
- Fuel bowzers are integrally banded and stored securely when not in use.
- Refuelling of smaller plant is undertaken using appropriate fuel cans with spouts or funnels to minimise spillage risk.
- All tanks and containers are clearly labelled with contents, capacity, and emergency procedures.

- COSHH and Environmental Hazard Data Sheets are maintained on-site and in the yard office, with storage conditions strictly adhered to.
- Toolbox talks are regularly delivered to ensure all personnel are aware of environmental protection measures, refuelling protocols, and site rules.
- Spill containment equipment, including plant nappies and absorbent materials, is deployed as a standard precaution across the site.
- Access to hazardous substances storage areas is restricted and controlled at all times.

5. Summary

This Green Infrastructure Statement has been prepared to accompany and support a planning application for the retrospective change of use of a livery yard and associated buildings to an inert material recovery facility, including an engineering fabrication unit.

The proposals include opportunities for green infrastructure measures that are appropriate to the site in question, proportionate to the development and have been identified in accordance with Planning Policy Wales's step wise approach (outlined at Paragraph 6.4.15 of Planning Policy Wales).