

Uskmouth Green Infrastructure Statement

R02

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AW2 Energy Storage Limited.

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Prepared by:	Christine Vundamina CMLI		
Checked by:	Lee Morris CMLI		

Ecology



Burroughs

01	Introduction	4
02	Policy Context	6
03	Existing Green Infrastructure	9
04	Landscape Strategy	13
05	Green Infrastructure Statement	15
06	Conclusion	17

01 Introduction

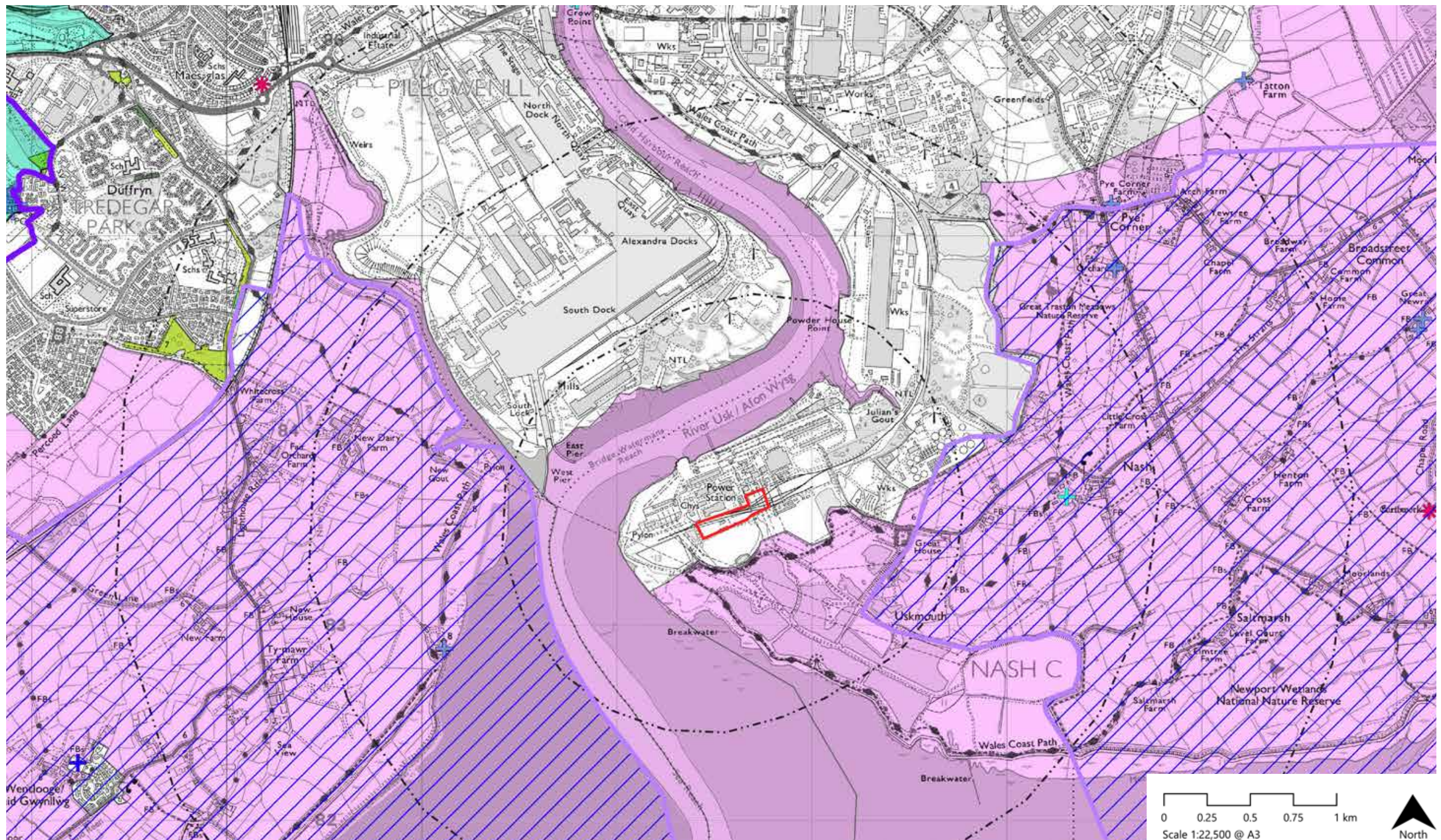
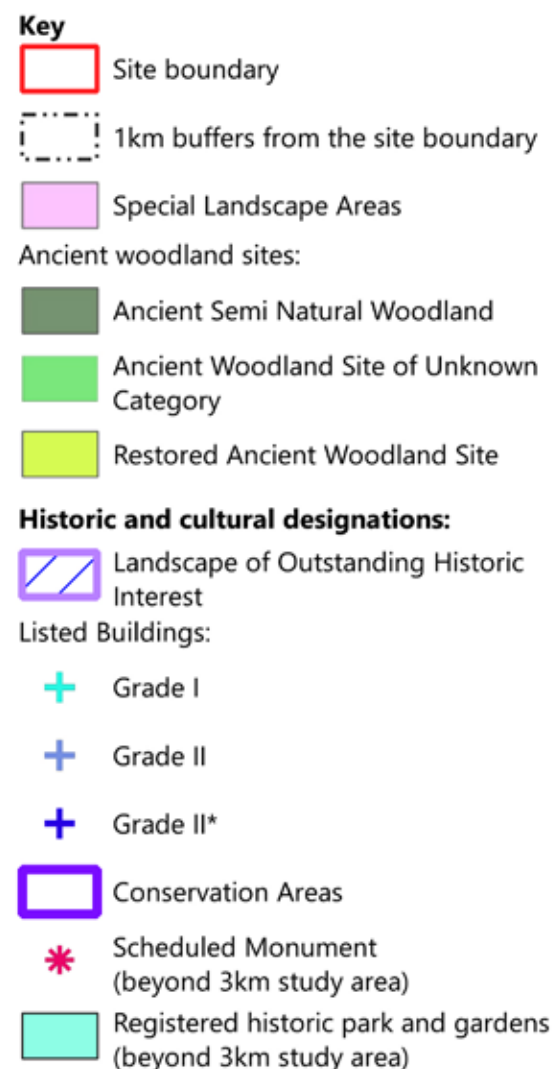


Figure 1: Site location



Scope

Tir Collective is instructed by SAE Renewables to prepare this **Green Infrastructure Statement**, which relates to the proposed battery storage development at Uskmouth Power Station, Newport.

Proposals at the site would include installation of battery energy storage system (BESS), together with high voltage substation compound, transformer stations, inverters, site access, security measures, access gates, other ancillary infrastructure. Access would connect the battery storage area with the rest of the Uskmouth Power Station site via an existing track alignment, which that runs along the sites east, south and western boundaries. The proposed development would have a temporary lifespan of 40 years. The proposed development also incorporates various landscape and ecological enhancements such as new native scrub and shrub planting.

The site covers 5.2 hectares of the Uskmouth Power Station site, circa 1.1km to the south of Newport Docks and circa 5km south of the centre of the City of Newport.

The site comprises a large sized rough grassland/scrub field, containing stored Ash, disused railway tracks and an area of storage. Boundaries are largely lined by mature scrub, a corrugated fence and wire fences.

The site field forms part of Uskmouth Power Station along the edge of the Usk River. The landscape that contains the site is heavily influenced by industrial activity and energy production. The site field is large and regular in shape, with boundaries that follow the internal tracks of Uskmouth Power Station to the northwest, east, south and west. The northeast boundary is defined by a scrub and corrugated fence and wire fence.

The site is situated on the relatively flat banks of the Usk River and contains a large area of Ash storage in the west and an area of storage in the northeast. The highest point of the site is in the centre of the western part of the site with a high point of 15m AOD (Above Ordnance Datum). The site falls in a northerly direction with a low point of 8m AOD in the east.

A line of pylon towers and overhead cables crosses the site in its eastern extents and a further set of pylon towers and overhead cables crosses landscape immediately to the west of the site.

Beyond the site, to the west at circa 300m is the Usk River and to the south, circa 150m is Newport Wetlands.

The landscape of the wider study area is defined by the Uskmouth Power Station, Newport Docks and industrial parks and the Usk River.

The landscape baseline conditions of the site are described in further detail within Landscape and Visual Appraisal (LVApp), which was also produced by Tir Collective. It describes the landscape of the site and provides assessment of effects on landscape character and visual amenity. Tir Collective with input from **Tetra Tech** also produced the Landscape and Ecological Management Plan (LEMP), which sets out the design, management and maintenance of the landscape and ecological proposals.

02 Policy Context

Wales Legislation

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.

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:

- (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.”



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

National Planning Policy

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 Well-being of Future Generations (Wales) Act 2015.

The key policy in relation 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) Edition 12, February 2024

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.

Section 6.2 sets out **green infrastructure** should be given early consideration in development proposals and how it should be integrated into developments.

Paragraph 6.2.12 states “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... The green infrastructure statement will be 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 has been applied.**”

Paragraph 6.2.14 states “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.**”

Section 6.4 describes **biodiversity and ecological networks** and provides a summary of the **Step-Wise Approach** and how it should be used to “**maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity** by ensuring that any adverse environmental effects are firstly avoided, then minimised, mitigated, and as a last resort compensated for.”¹ **Paragraph 6.4.12** states “providing evidence in the Green Infrastructure Statement that the step-wise approach has been followed, a scheme of enhancements must be provided to ensure a **net benefit for biodiversity.**”

In relation to **trees, woodland and hedgerows**, **paragraph 6.4.37** sets out their importance for biodiversity and “connecting habitats for resilient ecological networks and make an essential wider contribution to landscape character, culture, heritage and sense of place...”

¹ Paragraph 6.4.11, Planning Policy Wales Edition 12, February 2024

The **planting of new trees, hedgerows, groups of trees and areas of woodland** should be promoted as part of new development. Existing trees/ groups of trees, hedgerows and areas of woodland must be protected "where they have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial green infrastructure function."²

In relation to the permanent removal of trees, woodland and hedgerows, it "will only be permitted where it would achieve significant and clearly defined public benefits."³ The step-wise approach must also be followed. Where loss is unavoidable, PPW sets out the requirements of replacement planting, which "shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost."⁴

² Paragraph 6.4.39 Planning Policy Wales Edition 12, February 2024

³ Paragraph 6.4.42 Planning Policy Wales Edition 12, February 2024

⁴ Paragraph 6.4.42 Planning Policy Wales Edition 12, February 2024



The Step-Wise Approach from PPW Edition 12, Chapter 6

Finally, in relation to **SuDS**, paragraph 6.6.18 states "The provision of SuDS must be considered as an **integral part of the design of new development** and considered at the earliest possible stage when formulating proposals for new development." Paragraph 6.6.19 goes on to state "Design for multiple benefits and green infrastructure should be secured wherever possible..."⁵

⁵ Paragraph 6.6.19 Planning Policy Wales Edition 12, February 2024

Local Planning Policy

Newport Local Development Plan, 2011-2026

The site is located in Newport Unitary Authority. Relevant LDP policies in relation to the site and green infrastructure and biodiversity include:

SP1 Sustainability states that "Proposals will be required to make a positive contribution to sustainable development by concentrating development in sustainable locations on brownfield land within the settlement boundary. They will be assessed as to their potential contribution to:

[...]

ix) conserving, enhancing and linking green infrastructure, protecting and enhancing the built and natural environment;"

[...]

SP9 Conservation of the Natural, Historic and Built Environment states "the conservation, enhancement and management of recognised sites within the natural, historic and built environment will be sought in all proposals."

GP5 General Development Principles – Natural Environment states "Development will be permitted where, as applicable:

i) the proposals are designed and managed to protect and encourage biodiversity and ecological connectivity, including through the incorporation of new features on or off site to further the uk, welsh and/or Newport biodiversity action plans;

ii) the proposals demonstrate how they avoid, or mitigate and compensate negative impacts to biodiversity, ensuring that there are no significant adverse effects on areas of nature conservation interest including international, European, national, welsh section 4232 and local protected habitats and species, and protecting features of importance for ecology; [...]

v) there would be no unacceptable impact on landscape quality;

vi) the proposal includes an appropriate landscape scheme, which enhances the site and the wider context including green infrastructure and biodiversity networks;

vii) the proposal includes appropriate tree planting or retention where appropriate and does not result in the unacceptable loss of or harm to trees, woodland or hedgerows that have wildlife or amenity value."

Guidance

Placemaking Wales Charter

The **Placemaking Wales Charter** has been developed by Welsh Government and the Design Commission for Wales in collaboration with the Placemaking Wales Partnership. The charter outlines six placemaking principles that cover the range of considerations that contribute to establishing and maintaining good places.

Well designed, maintained and connected green infrastructure is an essential component of good placemaking. The design of the proposed development should focus on well connected GI with multi-functionality to maximise the benefits to the environment.

Landscape Institute Green Infrastructure: An integrated Approach, 2013

The document defines **Green Infrastructure** (GI) as *"the network of natural and semi-natural features, green spaces, rivers and lakes... It is a natural, service-providing infrastructure that is often more cost-effective, **more resilient and more capable of meeting** social, **environmental** and economic objectives..."*

The Landscape Institute recommends *"local authorities ensure that GI is a core requirement in their policy documents" and "developers be aware of an area's strategic GI goals and appreciate how those goals contribute to mitigating the environmental impacts of new development and creating beautiful places."*

Building with Nature Standards

The **Building with Nature Standards** Framework 2.0 involves twelve Standards, arranged across four groups. There are six Core Standards and three themes, Wellbeing, Water and Wildlife, containing two Standards in each.

The six Core Standards underpin the delivery of high-quality green infrastructure through design, planning and development. The Standards in the Wellbeing, Water and Wildlife themes build on this to target specific aspects:

CORE Standards

- Standard 1** Optimises Multi functionality and Connectivity
- Standard 2** Positively Responds to the Climate Emergency
- Standard 3** Maximises Environmental Net Gains
- Standard 4** Champions a Context Driven Approach
- Standard 5** Creates Distinctive Places
- Standard 6** Secures Effective Place-keeping

WELLBEING Standards

- Standard 7** Brings Nature Closer to People
- Standard 8** Supports Equitable and Inclusive Places

WATER Standards

- Standard 9** Delivers Climate Resilient Water Management
- Standard 10** Brings Water Closer to People

WILDLIFE Standards

- Standard 11** Delivers Wildlife Enhancement
 - Standard 12** Underpins Nature's Recovery
- Surveys have been carried out to confirm the green infrastructure features at the site and its surrounding context.



03 Existing Green Infrastructure

The elements that are considered to form the existing Green Infrastructure (GI) of the site and surrounding context are as follows:

- Trees
- Ecology and Habitat
- Watercourses and drainage

Trees

The tree survey and categorisation report was produced by **Treescene** on the 3rd March 2025.

The report highlights that tree cover on the site is sparse and largely confined to the periphery, where it exists in the form of isolated groups and trees.

The tree survey identified 2 individual trees and 4 tree groups. All trees and groups were identified as Category C, which have low retention value, see Figure 2.

All the trees surveyed are aged as young. Species surveyed include: Common alder *Alnus glutinosa*, Goat willow *Salix caprea*, Crack willow *Salix fragilis* and Birch *Betula pendula*.



Figure 2: Tree Constraints Plan, produced by Treescene.

Ecology and Habitat

A Preliminary Ecological Impact Assessment (PEA) was completed by **Tetra Tech** in December 2024.

The desk study confirmed that Newport Wetlands National Nature Reserve is located adjacent to the site's southeastern boundary. It is designated for birds e.g. little egret *Egretta garzetta*, ruff *Philomachus pugnax*, whimbrel *Numenius phaeopus*, and several other bird species. Additionally, certain fish species of national importance including allis shad *Alosa alosa*, twaite shad *A. fallax*, European river lamprey *Lampetra fluviatilis* and sea lamprey *Petromyzon marinus*.

230m to the north, south and west of the site is The Usk River, which is designated as a SAC. There are several other designations within 3km of the site, such as the Severn Estuary SPA, SAC and Ramsar.

The eastern part of the site comprises of mainly cultivated/disturbed land, Ephemeral/short perennial, hardstanding and Neutral grassland, Semi-improved. The western part of the site comprises of standing water, scrub, dense/continuous and a few individual broadleaved trees.

A wet ditch runs along the southern boundary of the eastern part of the site with another wet ditch located in the south-western part of the site.

In relation to species, it is considered necessary to undertake an eDNA and Habitat Suitability Index (HSI) survey of accessible ponds to ascertain whether Great Crested Newts (GCN) are present on Site. Owing to suitable habitat features and presence of species from historical records, it is considered necessary to undertake further surveys for reptiles and badgers.

With regards to invasive plant species, further surveys are recommended prior to development.

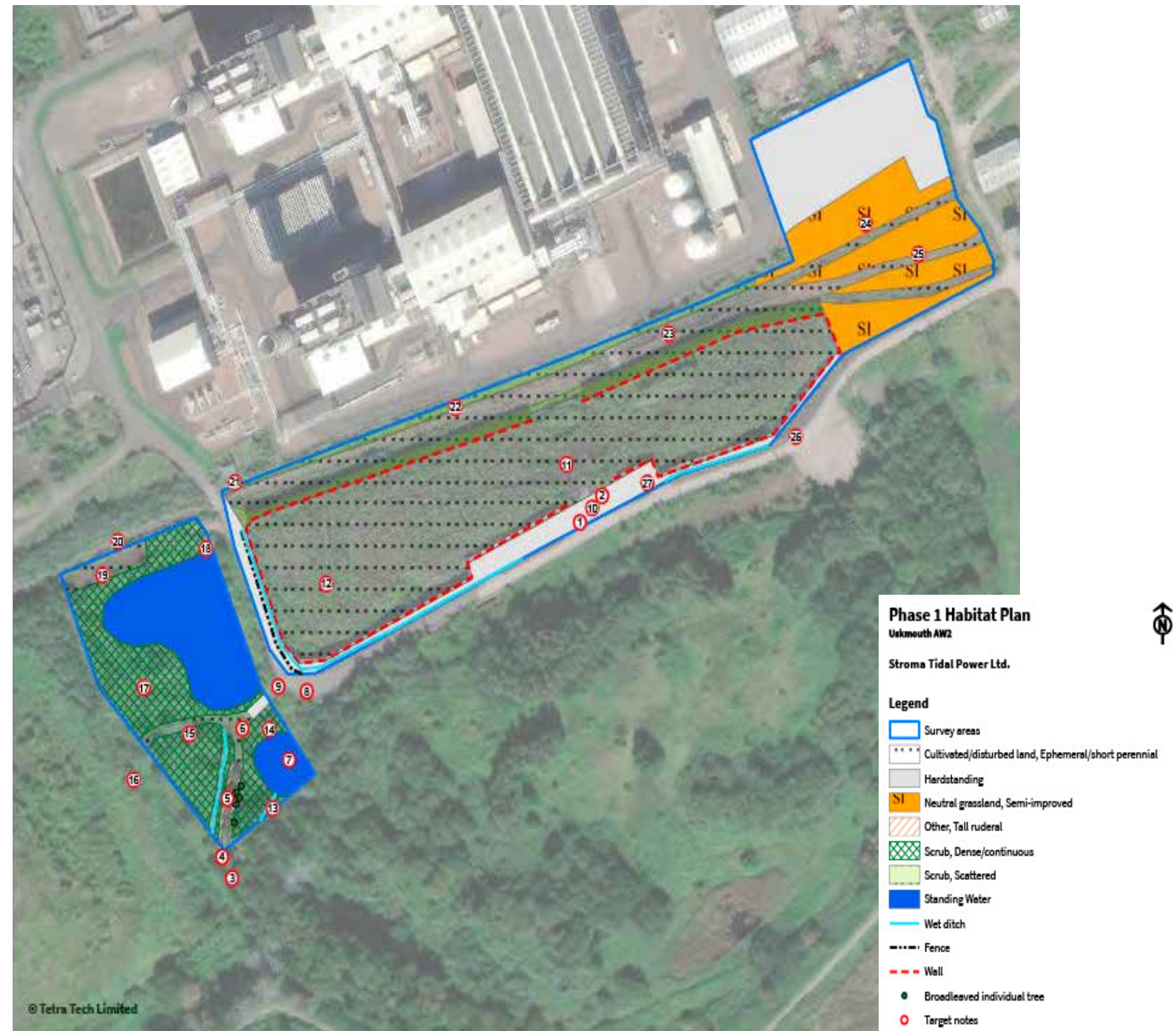


Figure 3: Phase 1 Habitat Plan, produced by Tetra Tech

Watercourses and drainage

A **Surface Water Drainage Strategy** was produced by **Burroughs** in December 2024. It included a topographic survey undertaken by Tetra Tech in December 2024. It confirmed ground levels are highest in the east of the site at approximately 9m AOD. Generally, the ground descends in a southern direction, with the lowest ground levels at approximately 8.14m AOD.

In relation to watercourses, there are no NRW Main Rivers or Ordinary Water Courses crossing the site. However, the Usk River is located circa 230m to the west of the site and there is a series of drainage channels and reens situated southeast of the development which are the Caldicot and Wentlooge levels. See **Figure 4**.

The geology of the site was also assessed using the British Geological Survey (BGS) GeoIndex. It indicates that there is no public data available from boreholes done by the British Geological Survey for the site vicinity. The soil present in the area is characterised as "loamy and clayey soils of coastal flats," and it is known to have naturally high groundwater levels according to the National Soils Research Institute. The development area has is classified as soil scape 21 which consists of loamy and clayey soils of coastal flats with naturally high groundwater. This has also been confirmed through initial site investigation listed in the FCA by RPS Group Plc.

There is currently a flat concrete slab beneath the PFA stockpiles that fall gradually towards the south of the AW2 site where the existing concrete conduit channels are situated. The concrete conduit channels direct the surface water runoff towards a primary settlement tank, then conveyed via a connection pipe beneath the carriageway to the final settlement tank.

The following SuDS features are currently proposed across the Scheme to intercept, treat, attenuate, and discharge surface water runoff:

- Porous paving (in the form of compacted gravel) ;
- Retrofitted dry swale within existing perimeter concrete conduit channel. Dry swale to have cellular attenuation crates and finished with permeable geotextile and topsoil.

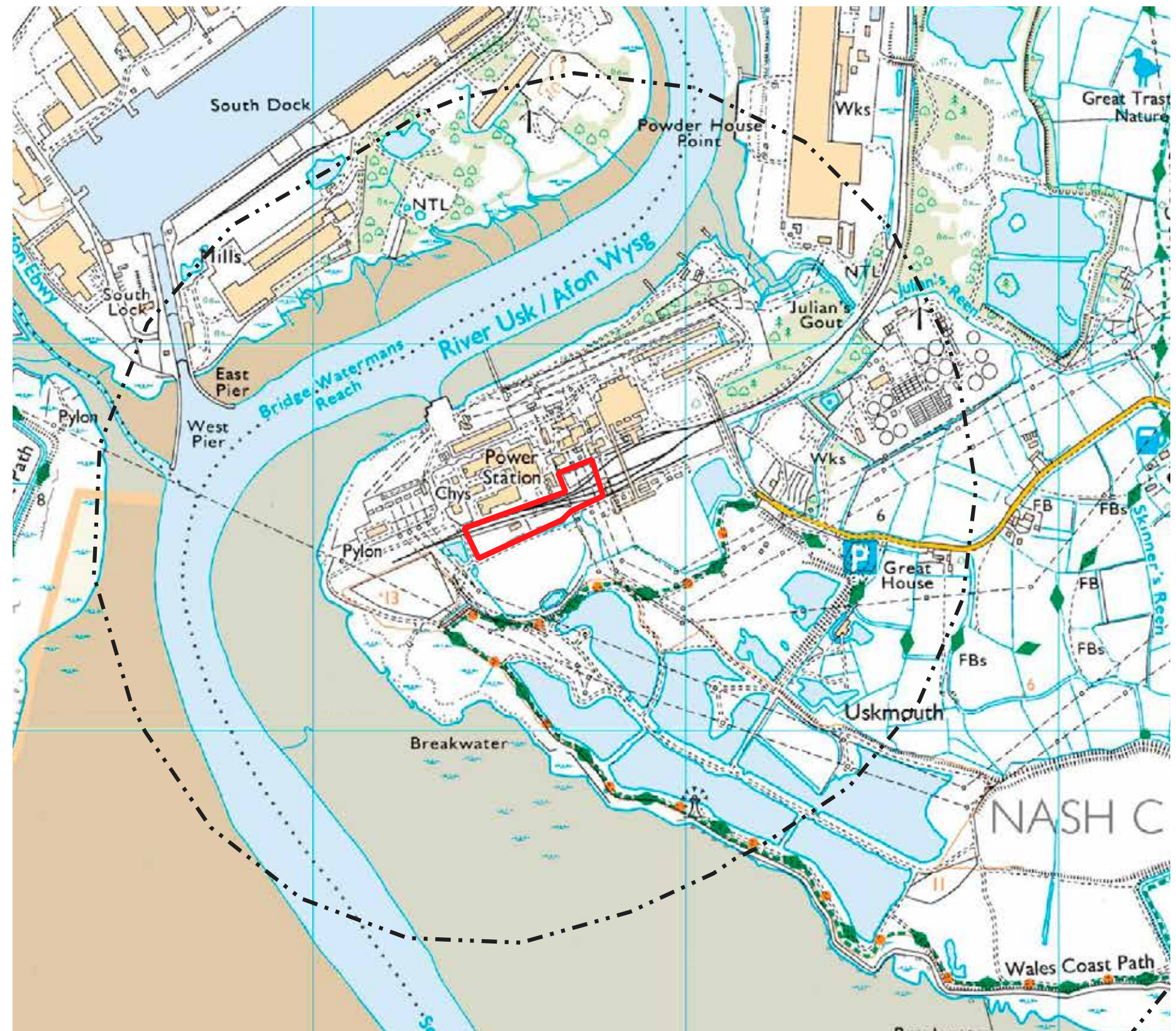


Figure 4: Nearby watercourses



Figure 5: Aerial image of the site and location of the proposed development

04 Landscape Strategy



Figure 6: Landscape Strategy

The Landscape Strategy is shown on **Figure 6**. It illustrates the key landscape design concepts, the retention of valuable habitats, and the enhancement of green infrastructure features which have guided the preparation of the landscape proposals:

- Retention, enhancement and protection of existing vegetation along boundaries and alongside ponds.
- Creation of buffers to boundaries, ditches and ponds, between sensitive boundary habitats and development footprint.
- Some native shrub planting are proposed along site boundaries to help screen and filter views of the proposed development. Species chosen will be native species of local provenance.
- Creation of areas of species-rich grassland in site margins around the BESS installation.
- Ecologically sensitive working practices as precautionary measures to protect species that may be utilising the site.
- A suitable buffer established around the root protection zone of each tree to be retained.

Maintenance and Management

The Landscape Ecological Management Plan (LEMP) sets out the management and maintenance of the proposed development over the operational phase of the BESS development.

The existing habitats identified as of value within the site will be retained and protected during the construction and operational phase of the development. Following decommissioning, the new areas of habitat that have been created will be retained.

The maintenance and management objectives of the proposals and enhancements are to ensure the overall design concepts are achieved and the planting is established.

Retained scrub and ponds



Proposed native tree and hedgerow planting



05 Green Infrastructure Statement

This statement provides a description of the effects of mitigation of the individual green infrastructure components, which forms the **Step 3: Mitigate/Restore**, with a view to minimising any negative impacts on biodiversity as far as possible. The proposed result in enhancements over and above mitigation for loss.

Trees

Although trees are sparse within the site, they contribute to the landscape character and setting of the area. The landscape approach to the design of the proposed development identified this importance and retention was a priority wherever possible, in accordance with **Step 1: Avoid** and **Step 2: Minimise**.

During the design development of the project, consideration was given to the existing individual trees and tree groups on site and adjacent to the site. In addition to the landscape character contribution, they also help to reduce potential visual impacts of the proposed BESS development. It was therefore critical to the design layout of the site that these features should be retained.

The proposed BESS and substation compound is set away from the trees and their Root Protection Area (RPA) to ensure they would not be harmed and can be retained.

Proposed access routes would utilise existing access tracks to avoid removing any trees or groups. All these **avoid** measures has resulted in all trees and tree groups being retained. The following **enhancement measures** are proposed for the site, which are also illustrated on the Landscape Strategy **Figure 6**:

- Strategic planting along the north and southern boundary of the site, reflecting the character and strengthening the existing boundary. The new planting would include a strip of shrub planting along the southern site boundaries, scrub planting along the northern boundary, adjacent to the retained ponds and existing scrub and trees.
- New meadow grass within the and along the slopes of the proposed swales.

The proposed shrub, scrub and meadow grass planting will increase the species diversity of planting on the site, will increase the extent of semi-natural habitats and linkages, improve the linear green corridors within and beyond the site, and contribute to the habitat enhancement on the site.

Ecology and Habitat

The following paragraphs identifies the **avoidance** of the ecological features of greatest importance and the **compensation** measures, which is **Stepwise Step 3: Mitigate / Restore** and **Step 4 : Compensate. Enhancement** is considered at each stage of the stepwise approach in accordance with the **DECCA Framework**.

The Newport Wetlands National Nature Reserve (NNR) lies adjacent to the south and southeast Site boundary. The proposed development would therefore cause no loss of habitat within the NNR. To prevent the development from impacting on the NNR during the construction phase standard airborne and water pollution prevention measures, in line with the Pollution Prevention for Businesses (2024) guidance, will be followed to avoid negative impacts through pollution and run-off.

In relation to habitats, the proposed layout includes the use of existing tracks and where possible, would not require any losses to boundary vegetation.

The proposals would result in the loss of some cultivated/ disturbed land, Ephemeral/short perennial, neutral grassland, Semi-improved and some scattered scrub with the entirety of the dense scrub within the western part of the Site to be retained. To offset the loss of grassland and scattered scrub as a result of the development, retained habitats will be enhanced through sensitive management, and important features such as ponds are to be buffered from the development footprint.

In relation to amphibians and reptiles, to partially mitigate for the loss of grassland, all boundary vegetation and ponds will be retained and protected with an appropriate buffer as part of the development. To protect reptiles and amphibians from harm, a method statement will be followed during Site preparation and construction.

To minimise the impacts on commuting and foraging bats, all boundary vegetation, ponds and dense scrub will be retained and protected with an appropriate buffer as part of the development. Reinstated scrub will increase opportunities available to commuting bats.

To minimise the impacts on the breeding bird population, all boundary vegetation, ditches and riparian habitats will be retained and protected with an appropriate buffer as part of the development. Any vegetation clearance should be undertaken outside of the breeding bird season (March to August inclusive).

Watercourses and drainage

SuDS features are proposed that take into account the impermeable areas of the compound and access tracks.

No existing foul water drainage has been identified within the AW2 site and there is currently no demand for foul drainage to be considered in the course of the proposed site development.

The design of the surface water management system should maximise amenity and biodiversity benefits across the site. SuDS components can contribute to improving the climate resilience of new developments. The ecological potential of the SuDS scheme can also be maximised by utilising local planting and providing measures to enhance the existing ecosystem and/or work to mitigate against the impact of the development to its surroundings.

Resilience of Ecosystems

The Environment (Wales) Act 2016 provides a duty upon public bodies such as Newport Council to promote the resilience of ecosystems.

The illustrative landscape masterplan for the proposed development shows that new and enhanced green corridors will be created to re-enforce connectivity along boundaries at the edges of the site and to the wider landscape. The LEMP sets out in detail the management and maintenance objectives, habitat creation, and measures to maximise ecological value.

The proposals would result in habitat enhancement and creation that will increase diversity across a range of species groups. The extent of new planting will be relatively small but the condition will be maintained through measures identified in the LEMP. This would include sensitive management of the retained habitats. Wildlife corridors and connectivity would be enhanced by scrub, shrub and species rich grass / meadow planting along boundaries, which would also introduce new species to the site. Overall, the proposed development would make a positive contribution to achieving ecosystem resilience locally.

Multi-functionality of Green Infrastructure

This section identifies the multi-functionality of each green infrastructure element: trees; ecology and habitat; and drainage and watercourses. These elements reflect the overarching principle of enhancement, applying the principles of good green infrastructure.

The multi-functionality of green infrastructure is described as "GI functions are the roles that assets can play if planned, designed and managed in a way that is sensitive to, and includes provision for, natural features and ecosystem services. They may have obvious primary functions, but each asset can perform different functions simultaneously". The Green Infrastructure functions and benefits of the proposals are listed against the list below:

- Retaining key natural characteristics
- Connected habitats for wildlife
- Reduce impact of climate change
- Nutrient cycling
- Wildlife habitat
- Improve water quality
- Improve soil organic matter
- Increase species and biodiversity

Multi-functionality of Green Infrastructure

Landscape asset	Green infrastructure element	Functions	Building with Nature Standards
Retained tree groups and scrub	Trees	• Retaining key natural characteristics • Wildlife habitat • Connected habitats for wildlife • Nutrient cycling	• 1 - Optimises Multifunctionality and Connectivity • 2 - Positively Responds to the Climate Emergency • 4 - Champions a Context Driven Approach • 5 - Creates Distinctive Places • 6 - Secures Effective Place-keeping
New native scrub and shrub planting	Trees	• Wildlife habitat • Connected habitats for wildlife • Reduce impact of climate change • Nutrient cycling • Improve soil organic matter • Increase species and biodiversity	• 1 - Optimises Multifunctionality and Connectivity • 2 - Positively Responds to the Climate Emergency • 3 - Maximises Environmental Net Gains • 5 - Creates Distinctive Places • 7 - Brings Nature Closer to People • 11 - Delivers Wildlife Enhancement • 12 - Underpins Nature's Recovery
Retained pond	Watercourses and drainage	• Retaining key natural characteristics • Wildlife habitat • Connected habitats for wildlife • Improve water quality	• 1 - Optimises Multifunctionality and Connectivity • 2 - Positively Responds to the Climate Emergency • 3 - Maximises Environmental Net Gains • 7 - Brings Nature Closer to People
Retained habitats	Ecology and Habitat	• Retaining key natural characteristics • Connected habitats for wildlife • Wildlife Habitat	• 4 - Champions a Context Driven Approach • 6 - Secures Effective Place-keeping • 11 - Delivers Wildlife Enhancement • 12 - Underpins Nature's Recovery
Proposed SuDS features	Drainage and Watercourses	• Improve water quality • Reduce flood risk • Wildlife Habitat • Increase species and biodiversity	• 1 - Optimises Multifunctionality and Connectivity • 2 - Positively Responds to the Climate Emergency • 4 - Champions a Context Driven Approach • 9 - Delivers Climate Resilient Water Management • 11 - Delivers Wildlife Enhancement • 12 - Underpins Nature's Recovery
Proposed bird and bat boxes, and habitat piles for habitat creation	Ecology and Habitat	• Wildlife Habitat • Connected habitats for wildlife • Increase species and biodiversity	• 3 - Maximises Environmental Net Gains • 7 - Brings Nature Closer to People • 11 - Delivers Wildlife Enhancement • 12 - Underpins Nature's Recovery

06 Conclusion

In relation to the Step-Wise Approach, the site is not located within a statutory designated landscape or site of ecological importance, but the site is located adjacent to Newport Wetland National Nature Reserve. Several surveys for the site were carried out by a range of consultants. Desk-based studies and field surveys have ensured that important features on the site have been identified, retained and protected, including existing tree groups and other locally valuable habitats and species.

Buffers from existing trees, ditches and associated riparian vegetation was incorporated into the development of the proposed site layout. All these **avoid** measures have resulted in all of tree groups within the site being retained, except for trees surveyed as Category U, which are unsuitable for retention regardless of the development proposals.

The proposed development provides an opportunity to provide scrub, shrub and species rich grass / meadow planting, and to introduce new species to the site to increase resilience. The new planting would enhance connectivity on the site and to the wider area.

Overall, it is considered that the proposed development would be in accordance with PPW Edition 12 and the Newport Local Development Plan policies relating to Green Infrastructure.





Floor 7, Brunel House,
2 Fitzalan Road,
Cardiff,
CF24 0EB