



**Green Infrastructure Statement – Geodomes, Laburnum House, Brynmawr, Llanymynech, SY22 6PQ**

This statement has been prepared to accompany the planning application for; retrospective planning of 4 x geodomes, installation of foul drainage and all associated works at Laburnum House, Brynmawr.

The Environment (Wales) Act 2016, provides a context for the delivery of multi-functional green infrastructure. Its protection and provision can make a significant contribution to the sustainable management of natural resources, and in particular to protecting, maintaining and enhancing biodiversity and resilience of ecosystems in terms of the diversity within and connections between ecosystems and the extent and condition of these ecosystems, so that they are better able to resist, recover from and adapt to pressures. This means that the development of green infrastructure is an important way for local authorities to deliver their section 6 duty.

Green infrastructure is capable of providing several functions at the same time and as a result offers multiple benefits, for social, economic and cultural as well as environmental resilience. The component of green infrastructure, by improving resilience of ecosystems, can result in positive benefits to well-being including flood management, water purification, improved air quality, reduced noise pollution and local climate moderation, climate change and food production. These benefits are important in urban environments where they can facilitate health and well-being related benefits of open space, clean air and improved tranquillity, for example, as well as creating a sense of place and improved social cohesion. In addition, green infrastructure has a role in protecting local distinctiveness, providing economic benefits and social and community opportunities.

It is recognised that all development proposals need to go through a step wise approach when considering green infrastructure, to ensure any development has a net gain in terms of the environment.

We have carried out this approach below:

**The Step-Wise Approach**

1. (a) The first priority for planning authorities is to avoid damage to its biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystems functioning. Where there may be harmful environmental effects, planning authorities will need to be satisfied that any reasonable alternative sites (including alternative siting and design options) that would result in less harm, no harm or benefit have been fully considered.

**The site is made up of an area of improved grassland, with very little ecological values. The surrounding land around the proposal is also made up of improved grassland. There has been no removal of any trees within our proposal. We have however included for various new native hedgerows to be planted. This will hopefully increase the biodiversity on site and provide a net gain.**

1. (b) Proposals in statutory designated sites are, as a matter of principle unacceptable, and therefore, must be excluded from site searches undertaken by developers. This principle also extends to those sites containing protected species and habitats which are irreplaceable and must be safeguarded. Such sites form the heart of resilient ecological networks and their role and the ecosystem services they provide must be protected, maintained and enhanced and safeguarded from development. It will be wholly exceptional for development to be justified in such instance.

**This site is not within any statutory designated site, nor has it got any protected species, as outlined within the ecology comments on the previous application (23/1071/FUL)**

### **Minimise Damage to Biodiversity**

2. When all locational, siting and design options for avoiding damage to biodiversity have been exhausted, applicants, in discussion with planning authorities must seek to minimise the initial impact on biodiversity and ecosystems by:

2 (a) Maintaining the largest possible area of existing habitat supporting the biodiversity and functioning ecosystems, particularly section 7 habitats and species where present, by minimising development size and appropriate orientation on site, paying due regards to the potential for continued long term maintenance and management retained area to benefit biodiversity.

**The development size has been minimised as much as possible in an attempt to support the existing biodiversity. As shown on plans, it has only taken place on improved grassland, which has very little ecological benefit.**

2 (b) Ensuring that retained habitats continue to be well connected to adjacent habitats to provide connectivity for key species and ensuring that the favourable conservation status of local species populations is maintained.

**The previous use of the development site was for agricultural grazing. Therefore we would deem that there is very little habitat on site. But the planting on new native hedgerows will hopefully increase this. We have also proposed the installation of 2 x bat boxes and 2 x bird boxes. This again will bring a biodiversity net gain.**

2 (c) Retaining existing features, develop a management plan for their future care (e.g. trees, hedgerows, species rich grassland, health wetlands, ponds and freshwater habitats) and use appropriate buffers to protect these from construction and operational impacts, and

**There has been no lose of trees or hedgerows with the proposed development, therefore no loss of habitat has been created.**

2 (d) Using proven innovative/creative solutions (where required) to minimise damage and maintain existing biodiversity features and ecosystems in tandem with robust monitoring and rectification strategies.

**The proposed installation of woodcrete bird and bat boxes to enhance biodiversity, as well as the planting of new native hedgerows.**

### **Mitigate/Restore Biodiversity**

3 (a) Where, after measures to minimise impact, biodiversity and ecosystems could still be damaged, or lost through residual impacts, the proposed development should mitigate that damage. Mitigation measures must be put in place to limit the negative effects of a development.

**The proposed hedgerow planting will now provide new habitat on site to increase the biodiversity. There is also the installation of bird and bat boxes, which can be seen on the proposed plans.**

3 (b) Effective mitigation or restoration measures should be incorporated into the design proposal following the consideration of steps one and two above. Mitigation or restoration measures must be designed to address the specific negative effects by repairing damaged habitats and disturbed species. They should seek to restore in excess of like for like accounting for disturbance and time lags for recovery of habitats and species, and in every case, mitigation or restoration measure should seek to build ecosystem resilience within the site and where possible the wider area. In some circumstances, where like for like mitigation measures is not possible, particularly in respect to restoration measures, it may be necessary to consider on site compensation measures in the first instance. In designing mitigation measures where uncertainty exists, applicants should follow the precautionary principle and assume a significant effect. Offsite compensation measures (as set out in step four below) should be considered.

**The proposal will have very little environmental impact, with their hopefully being a positive net gain with the installation of bird and bat boxes and the planting of new native species hedgerows.**

#### **Compensation on-site**

4 When all the steps above have been exhausted, and where modifications, alternative sites, conditions, or obligations are not sufficient to secure biodiversity outcomes further onsite/immediately proximate, and as a last resort off-site compensation for unavoidable damage must be provided. This must be of significant magnitude to fully compensate for any loss. In absence of a planned approach, compensation measures must be guided by place-based evidence and the onus are on the applicants to address the follow:

4 (a) Off-site compensation should normally take the form of habitat restoration, or habitat creation, or the provision of long-term management agreements to enhance existing habitats to deliver a net benefit for biodiversity. It should also be informed by a full assessment to establish a formal baseline before habitat creation or restoration starts and secured far enough in advance before the loss of biodiversity on site.

**There will be no need for any off-site compensation, as no loss of habitat will be created. The installation of bird and bat boxes, as well as the new native hedgerow planting, so promote habitat even further.**

4 (b) The Green Infrastructure Assessment should be used to identify suitable locations for securing off-site compensation. Where possible, a landscape-scale approach, focusing on promoting wider ecosystem resilience, should help guide locations for compensation. The Green Infrastructure Assessment should provide a spatial guide to opportunities already identified for securing a net benefit for biodiversity. Using the assessment will help determine whether locations for habitat compensation should be placed close to the development site, or whether new habitat or additional management located further away from the site would best support biodiversity and ecosystem resilience at a wider scale.

**No off-site compensation is required.**

4 (c) Where compensation for specific species is being sought, the focus should be on maintaining or enhancing the population of the species within its natural range. This approach might also identify locations for providing species-specific compensation further away from the site. Where they exist, Spatial Species Action Plans should be used to help identify suitable locations.

**No off-site compensation is required.**

4 (d) Any proposed compensation should be place based, taken account of section 6 Duty (Biodiversity and Resilience of Ecosystems Duty), the DECCA framework and appropriate ecological advice from the local authority Ecologist, NRW and, or a suitably qualified ecologist.

**Section 6 has been considered, with planting proposed on site.**

#### **Compensation Off-site**

5 Each stage of the stepwise approach must be accompanied by a long term management plan of agreed and appropriate avoidance, minimisation, mitigation/restoration and compensation measures alongside the agreed enhancement measures. The management plan should set out the immediate and on-going management of the site, future monitoring arrangements for all secured measures and it should clearly identify the funding mechanisms in place to meet the management plan objectives. The management plan must set out how a net benefit for biodiversity will be achieved within as short a time as possible and locally responsive and relevant to local circumstances.

**As confirmed within the steps above, there is little biodiversity potential on site. The proposal will involve the planting of native species hedgerows on the proposal, as well as the installation of woodcrete bird and bat boxes. This will therefore provide a natural gain.**

#### **Refusal**

6 Finally, where the adverse effects on biodiversity and ecosystem resilience clearly outweighs other material considerations, the development should be refused.

**It hopefully clear that the development will have very little effect on the biodiversity or ecosystems resilience, and therefore should be seen as acceptable.**