

Green Infrastructure Statement

Site Address: Land at Coverack Road, Newport, NP19 0DS

Proposed Development: Proposed development of 40 flats with associated works

Site description: The application site comprises a rectangular parcel of brownfield land measuring approximately 0.17 Ha in size, on Coverack Road located to the east of the River Usk. The site is currently vacant, and is understood to have been vacant for a number of years dating back to the mid-2000s since the demolition of a former paint mill which occupied the site,

More recently, the site has been used as a compound to facilitate the development of 'Phase 1' residential development off Coverack Road, along the banks of the River Usk. As such, the surrounding context is considered to be largely former industrial, now residential, reflective of the local character of terraced properties within the vicinity and of several-storey high residential blocks along the River Usk.

Surrounding Area description: The proposed development site is situated in a mixed-use area characterised by both residential and industrial land uses. To the north and east, the site is bordered by residential properties, offering a predominantly urban setting. The River Usk lies to the south-west of the site, providing a natural boundary and a scenic waterway. Notably, the George Street Bridge spans across the site's north-western perimeter, offering transport connectivity and visual prominence.

The site is located approximately 10 meters from the River Usk Special Area of Conservation (SAC), highlighting its proximity to important natural habitats. Additionally, the Severn Estuary SAC, Special Protection Area (SPA), and Ramsar site lie around 6 kilometers to the west, further emphasising the environmental significance of the region. These designated sites contribute to the ecological value of the surrounding landscape, influencing the development's context and potential considerations for environmental impact.

Green Infrastructure Strategy: Paragraph 6.21 of Planning Policy Wales 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 and some components, such as trees and woodland, are often universally present and function at all levels. At the landscape scale green infrastructure can comprise entire ecosystems such as wetlands, waterways, peatlands and mountain ranges or be connected networks of mosaic habitats, including grasslands. At a local scale, it might comprise parks, fields, ponds, natural green spaces, public rights of way, allotments, cemeteries and gardens or may be designed or managed features such as sustainable drainage systems. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks."*

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 the 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 under the Environment (Wales) Act 2016.

The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well-being outcomes.

The stepwise approach for biodiversity in Planning Policy Wales (PPW) 12 is designed to ensure that developments contribute to maintaining and enhancing biodiversity while building resilient ecological networks. This approach follows a clear hierarchy of actions, prioritising avoidance of harm to biodiversity and requiring net benefits for nature wherever possible. The steps are as follows:

1. Avoidance

- The first priority is to avoid any adverse environmental impacts on biodiversity. This involves careful site selection and design to ensure that important habitats and species are not harmed.
- For example, developments should be located away from sensitive areas such as Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs), or areas with protected species.

2. Minimisation

- If impacts cannot be entirely avoided, they should be minimised through appropriate mitigation measures.
- This could include timing construction works to avoid sensitive periods (e.g., bird nesting or bat roosting seasons) or designing lighting to prevent disturbance to nocturnal species.

3. Mitigation

- Where impacts remain after avoidance and minimisation, mitigation should be implemented to reduce the scale or severity of the impact.
- Examples include creating alternative habitats on-site or adjacent to the development to support displaced species, or implementing measures like pollution controls to protect nearby ecosystems.

4. Compensation

- As a last resort, if residual impacts cannot be mitigated, compensatory measures must be provided to offset biodiversity losses.

- This might involve creating or enhancing habitats elsewhere to replace those lost due to development.

5. Enhancement

- Developments are required to deliver net benefits for biodiversity, going beyond simply mitigating impacts.
- This involves integrating biodiversity enhancements into the design, such as planting native species, creating green roofs, or installing features like bat and bird boxes.
- Enhancements should aim to strengthen ecological networks and improve ecosystem resilience, in line with the DECCA framework (Diversity, Extent, Condition, Connectivity, Adaptability).

Application in Planning

PPW12 mandates that developers submit a Green Infrastructure Statement to demonstrate how this stepwise approach has been applied. The statement should provide evidence of:

- How adverse effects have been avoided, minimised, or mitigated.
- The compensatory measures proposed for unavoidable impacts.
- The specific biodiversity enhancements included to deliver net benefits.
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By adhering to the stepwise approach, developments contribute to the Section 6 duty under the Environment (Wales) Act 2016, which requires public authorities to maintain and enhance biodiversity while promoting ecosystem resilience. This ensures that planning decisions support sustainable development and the long-term health of Wales' natural environment.

The DECCA Framework and Net Benefits for Biodiversity: The DECCA framework is used for evaluating ecosystem resilience based on five attributes and properties specified in the Environment (Wales) Act. These are: Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience.

A summary of the definitions is described below:

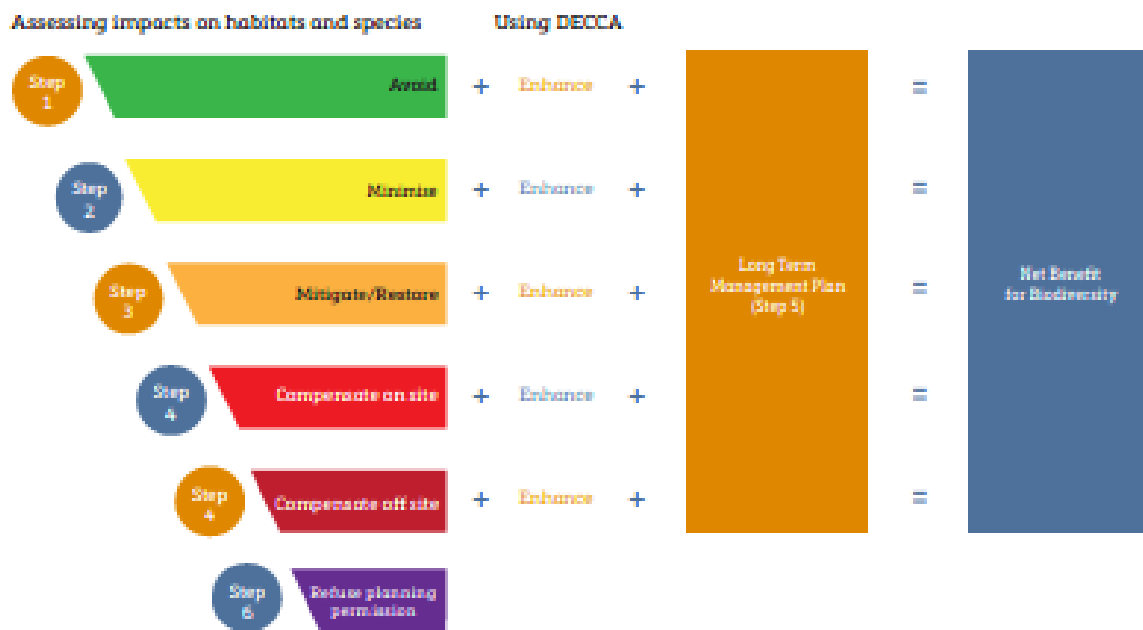
- **Diversity:** *maintaining and enhancing diversity at every scale, including genetic, structural, habitat and between-habitat levels. This supports the complexity of ecosystem functions and interactions that deliver services and benefits.*
- **Extent:** *incorporating measures which maintain and increase the area of semi-natural habitat/features and linkages between habitats. In general, smaller ecosystems have reduced capacity to adapt, recover or resist disturbance.*
- **Condition:** *The condition of an ecosystem is affected by multiple and complex pressures acting both as short term and longer term types of disturbance. Both direct and wider impacts should be considered, for example avoiding or mitigating pressures such as climate change, pollution, invasive species, land management neglect etc.*
- **Connectivity:** *This refers to the links between and within habitats, which may take the form of physical corridors, stepping stones in the landscape, or patches of the same or related vegetation types that together create a network that enables the flow or movement of genes, species and natural resources. Developments should take opportunities to develop functional*

habitat and ecological networks within and between ecosystems, building on existing connectivity.

• **Aspects** of ecosystem resilience (adaptability, recovery and resistance): ecosystem resilience is a product of the above four attributes. Adaptability, recovery and resistance to/from a disturbance are defining features of ecosystem resilience.

Paragraph 6.4.11 of Planning Policy Wales states that “planning authorities must follow a step-wise approach 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. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.”

Figure 12: Summary of the Step-Wise Approach



Paragraph 6.2.12 of Planning Policy Wales states that “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. 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 (Paragraph 6.4.15) has been applied.

Baseline Data

The submitted Preliminary Ecological Appraisal confirms the ecological baseline for the site. The report confirms that the site is located near the River Usk/Afon Wysg SSSI and SAC, with

only a dense scrub and footpath separating it from the riverbank. The report confirms the following concerning protected species:

- **Birds:** Vegetation clearance should avoid the bird breeding season (March to August). If this is not possible, an experienced ecologist should supervise the clearance to safeguard any nests.
- **Bats:** George Street Bridge has low potential to support roosting bats, and no works will be carried out on the bridge. However, to prevent indirect impacts from light disturbance, night work should be avoided, and lighting should be low-level and directional. Bat-friendly features, such as bat blocks and boxes, should be incorporated into the development. Light pollution near the River Usk should be minimised to protect foraging and commuting bats.
- **Badgers:** No signs of badgers were recorded, and they are unlikely to be impacted by the development.
- **Otters:** Otters are present in the River Usk. While the site does not provide otter holts, the river section nearby could be used for commuting and foraging. Construction near the watercourse should avoid night-time works and lighting, and any excavations within 30m of the water should be safely covered or ramped. Pipework should be sealed overnight to prevent animals from becoming trapped.
- **Amphibians and Reptiles:** The site provides limited habitat for reptiles, and impacts can be managed through precautionary working practices, such as hand dismantling rubble piles. Amphibian presence is unlikely due to the lack of suitable breeding ponds nearby, but works should cease if amphibians are encountered.
- **Invertebrates:** The removal of vegetation will result in the loss of habitat for some invertebrates. Compensatory habitat creation, such as native plantings or log piles, should be incorporated into the development to support local invertebrate species.

The development will result in a small-scale loss of open mosaic habitats and mixed scrub, which are sparse and in poor condition, minimising the impact. There is potential for habitat creation, including tree and hedgerow planting. Indirect impacts on habitats associated with the River Usk have been assessed through the Habitats Regulations Assessment. The HRA confirms that the proposed scheme will not adversely affect the River Usk SAC or Severn Estuary SAC, SPA, and Ramsar sites, provided the following mitigation measures are implemented:

- **Pollution prevention:** Industry-standard measures to address risks such as fuel and concrete spills.
- **Otter checks:** Daily inspections of the works area, with work ceasing immediately if an Otter is encountered, pending ecological advice.
- **Timing restrictions:** Works to occur from July to mid-October, avoiding fish and Lamprey spawning (March–July) and migration seasons (October–February).
- **Lighting controls:** Prefer daylight working hours; if night work is necessary, minimize artificial lighting and use directional cowls to prevent light spill onto the watercourse.

The application is not supported by a Tree Survey as there is currently no existing GI on site.

Demonstrating Net Benefits for Biodiversity [NBB]: The proposed development includes a comprehensive landscaping scheme designed to enhance biodiversity, restore habitat connectivity, and provide visual and ecological benefits. Key features include:

- **Tree and Hedgerow Planting:** New planting along the site boundary will reconnect the site to surrounding habitats and establish a vegetated corridor along the River Usk.
- **Compensatory Habitat:** To offset vegetation removal and habitat loss for invertebrates, enhancements such as native planting and log piles will be incorporated.
- **Diverse Planting Design:** A mix of ornamental and functional plants, including evergreen shrubs (e.g., Japanese Laurel, Aztec Pearl Mexican Orange Blossom), deciduous trees (e.g., Hornbeam, Field Maple, Sweetgum), and seasonal flowering plants, will ensure year-round visual interest and support local wildlife.
- **Bio-Retention Basin:** Integrated for stormwater management, the basin will feature moisture-loving plants like Fool's Water-cress, Sharp-angled Sedge, and Yellow Flag Iris. This feature improves water quality, prevents erosion, and provides habitats for aquatic species, amphibians, and birds.
- **Biodiversity and Amenity Value:** The landscaping plan aligns with the Environment (Wales) Act and Planning Policy Wales, focusing on enhancing local ecosystems and supporting wildlife with shelter, food, and nesting opportunities. Seasonal planting ensures a dynamic, evolving landscape that benefits both biodiversity and the community.

The proposal avoids tree removal, addressing the poor quality of existing vegetation on-site, while creating a resilient and ecologically rich environment that promotes sustainable water management and high-quality green spaces.

Conclusion: The proposed development at Coverack Road demonstrates a thoughtful approach to integrating green infrastructure and enhancing biodiversity in line with the Environment (Wales) Act and Planning Policy Wales. By transforming a brownfield site into a vibrant residential community, the scheme addresses both ecological and urban needs.

Key measures include the creation of compensatory habitats, tree and hedgerow planting, and the incorporation of a bio-retention basin for sustainable water management. These features, alongside a carefully designed planting scheme, ensure the development supports local wildlife, restores habitat connectivity, and enhances the visual and ecological value of the area.

The mitigation measures proposed, such as pollution prevention, light management, and species-specific protections, ensure that the development minimizes its environmental impact, particularly concerning the nearby River Usk SAC. The landscaping strategy provides

year-round ecological and amenity benefits, offering a high-quality, sustainable space for both residents and wildlife.

Overall, the development successfully balances residential needs with environmental responsibilities, delivering net benefits for biodiversity while contributing to the resilience and sustainability of the local ecosystems.