Welsh Government recently made changes to Planning Policy Wales Edition 11 to address the nature emergency by publishing a revised Chapter 6 'Distinctive and Natural Placemaking and Well-Being'.

The policy changes came into immediate affect and impacts on all planning applications.

There is a great deal to consider in the revised Chapter 6, however the main policy changes relate to:

- Green Infrastructure
- Net Benefit for Biodiversity and the Step Wise Approach
- Protection for Sites of Special Scientific Interest
- Trees and Woodlands

One key change is the requirement for all planning applications to be submitted with a 'Green Infrastructure Statement' (para 6.2.5). A 'Green Infrastructure Statement' is now required with all new applications and should describe how green infrastructure has been incorporated into the proposal.

The statement should be proportionate to the scale and nature of the proposed development, for example on householder and minor developments this would normally be a short description.

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 6.4.21) has been applied.

This statement relates to an application for full permission for the erection of 9 dwellings at Watts Dyke, Llay. The site occupies previously developed land and has an extant permission for a local retail store and associated parking. It is acknowledged that Planning Authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means that development should not cause any significant loss of habitats or populations of species (not including non-native invasive species), locally or nationally and it must provide a net benefit for biodiversity and improve, or enable the improvement of the resilience of ecosystems.

In this instance there are no statutory and non-statutory designated sites and habitats within the vicinity of the site. Similarly, there are no woodlands effected by the proposed development, although some self-seeded trees occupy the southern boundary.

Approximately 90% of the application site consists of a mowed grass area. It would appear that the whole area has been regularly maintained over the years through routine mowing. This has effectively removed habitats and has vastly reduced biodiversity. Only shorter plants survive which has a knock on effect on the bio-diversity of organisms such as pollinators and herbivores. Consequently, the vast majority of the site is of low ecological value and not a habitat of any ecological significance. Evidence from elsewhere would indicate that increased mowing intensity had negative ecological effects, particularly on

invertebrate and plant diversity and that pest species on the other hand had benefitted from intense grass cutting regimes. There are also no trees or shrubs within this large middle area of the site, although some exist on the southern boundary.

It be noted however that this application forms part of much larger scheme for residential development on the British Legion site. In accordance with your guidance the enhancements do not need to be directly attached to the proposed construction, provided they can be shown on land within the red or blue line. At present approximately 80% of the land in blue (the larger portion of the whole site with permission) is made up of hardstanding and the British Legion building itself. It is devoid of vegetation. In addition, 90% of the application site is mowed grass. The combined effect is an area with low ecological value and not a habitat of any ecological significance. It also cannot be ignored that the site has planning permission to develop the entire site for retail use with limited opportunities for net bio-diversity gain. In fact, the site could be cleared in preparation for that development.

The current proposal allows us to provide an alternative scheme which provides significantly more natural areas of green space and opportunities for ecological enhancement as a result of the new areas of high quality greenspace within the proposed development and on the adjoining land (edged in blue) as part of the wider housing development. The proposed development will include open space which will be subject to less routine maintenance, planted with native species, trees, wildflowers etc, which will enable bees, butterflies and other such wildlife to establish on site. There would also be opportunities to introduce bird and bat boxes on individual dwellings built to your specification, which could be conditioned. It should also be noted that the extent of new green space would also be significantly greater than the approved retail scheme which could be implemented.

All nine dwellings have garden areas which will meet the Councils minimum standards. The proposed linear form of site layout also provides greater connectivity between gardens creating a green corridor throughout the development. This will provide opportunities for tree planting along individual site boundaries and the generous private gardens will invariably introduce additional planting by future occupiers. This, in addition, to site landscaping and frontage planting will create small areas of new habitat which do not presently exist. This is a significant biodiversity gain as habitat potential is currently low with little or no opportunity for enhancement across much of the site.

The proposed deletion of the previously approved vehicular access also provides more green space at this end of the site improving connectivity with the public open space in that corner. Again further opportunities exist for habitat creation as a result of this which should leave biodiversity and the resilience of ecosystems in a significantly better state than presently exists or as approved via the previous planning permission.

The introduction of native species rich planting will provide a good source of direct and indirect forage for a variety of invertebrate, birds and small mammal species; improved habitat connectivity for the same, (particularly bats), and nesting opportunities for birds.

Any external lighting proposed and the levels of noise and disturbance will also be significantly less than the approved retail use. Consequently, there should be no impact upon bats and additional tree planting should encourage improved connectivity with adjoining woodland areas.

In terms of the Step-Wise Approach, because of the existing condition of the site there are no harmful environmental effects which need to be mitigated. The measures put forward therefore are not, strictly speaking compensatory, but represent an overall benefit or enhancement opportunity. We are not compensating for any detrimental impact or loss of habitat, but creating opportunities for net biodiversity gain which do not presently exist.

Given the nature of the proposed use and the environmental changes involved, the proposed improvements represent a proportionate intervention as required by the legislation.