

# PROPOSED RESIDENTIAL DEVELOPMENT AT MAES EMLYN, RHYL



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## GREEN INFRASTRUCTURE STATEMENT

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### 1. INTRODUCTION

- 1.1 This Green Infrastructure Statement has been produced by Enfys Ecology for Wales and West Housing, for a proposed residential development of 23 new dwellings at Maes Emlyn, Rhyll, LL18 3SF.
- 1.2 Green infrastructure (GI) is defined in Planning Policy for Wales (PPW) Edition 12<sup>1</sup> as “*the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places*”. Development proposals should take GI into consideration in order to avoid negative impacts on habitats and species, and seek ways to maintain and enhance biodiversity. Impacts on habitats and species should be treated in a step-wise manner (PPW 12, paragraph 6.4.15), by seeking to:
- **Avoid** damage to biodiversity in its widest sense by maintaining the largest possible area of existing habitat supporting biodiversity and functioning ecosystems, particularly Section 7 habitats and species where present, through careful development design and consideration of long-term maintenance and management and ensuring that retained habitats continue to be well connected to adjacent habitats to provide connectivity for key species.
  - **Minimise** any impacts that cannot be avoided.
  - **Mitigate** or **restore** by identifying measures to address the specific negative effects by repairing damaged habitats and disturbed species. The measures should seek to restore in excess of like for like, accounting for disturbance and time lags for the recovery of habitat and species, and in every case, mitigation or restoration measures should seek to build ecosystem resilience within the site and where possible the wider area.
  - 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.
  - All development must deliver a net benefit for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed). Therefore finally, **enhancement** is proposed.
- 1.3 Denbighshire County Council provide local planning policy information in the ‘Denbighshire County Council Local Development Plan 2006 – 2021’ and Supplementary Planning Guidance documents.
- 1.4 There are no specific policies related to green infrastructure, however biodiversity and green infrastructure are discussed in the following:
- DCC LDP 2006 – 2021 Policy RD 1 – Sustainable development and good standard design;
  - DCC LDP 2006 – 2021 Policy VOE 1 – Key Areas of importance;
  - DCC LDP 2006 – 2021 Policy VOE 5 – Conservation of natural resources;

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<sup>1</sup> See: <https://www.gov.wales/planning-policy-wales>

- Supplementary Planning Guidance Note – Conservation and Enhancement of Biodiversity (July 2016);
- Supplementary Planning Guidance Note – Trees & Landscaping (July 2016); and,
- DCC ‘Response to Update of Chapter 6 of Planning Policy Wales’ .

## 2. SCHEME DETAILS

2.1 The proposed works at Maes Emlyn involve demolition of two existing blocks of flats and construction of a residential development, comprising 23 housing units including flats, bungalows and houses. Associated infrastructure will include an extension of the existing hardstanding road, construction of a cycle shelter, electrical sub-station and bin collection points. There will be a railway easement of 3 metres from the southern site boundary. Several trees onsite will be removed and a Sustainable Drainage Systems (SuDS) feature created. The scheme also includes tree planting across the site, to supplement the existing hedgerow at the western boundary and creation of new hedgerows in several locations including at the eastern boundary. Furthermore, there will be areas of wildflower and grassland meadow created across the site.

2.2 The following reports, drawings and statements produced as part of the design are considered relevant to the Green Infrastructure status of the site and so were reviewed in the production of this Green Infrastructure Statement (Table 2.1):

**TABLE 2.1: PROJECT INFORMATION SOURCES**

Information	Organisation	Reference
Preliminary Ecological Appraisal	Enfys Ecology Ltd	EE.5433.25.DA- Maes Emlyn, Rhyl- Update PEA, PRA and Nesting Bird Survey
Mitigation and Conservation Plan		EE.5433.26.DA Maes Emlyn Mitigation and Conservation Plan
Landscape Plan	Above Zero	081.02.02_Maes Emlyn, Rhyl_Landscape GA
Planting Schedules		081.02.02_Maes Emlyn, Rhyl_Planting Schedules
Planting Specification		081.02.03_Maes Emlyn, Rhyl_Planting Specification
Arboricultural Impact Assessment	Tree Solutions	25/AIA/DEN/78 (Rev C)
Arboricultural Method Statement		25/AMS/DEN/78 (Rev A)
Flood Consequences Assessment	Waterco Datrys	14973-FCA-02
Drainage Layout		14973-1001-P01
Outline Drainage Strategy		14973-Drainage Strategy Technical Note-01
Design & Access Statement	RLH Architectural	Maes Emlyn, Rhyl- DAS
Site Location Plan		R620100A
Topographic Survey Plan		R620102B
Site Constraints Plan		R620103D
Proposed/Concept Site Plan		R620105
Garden Arrangement Plan		R620109A
Domestic Lighting Plan		R620113
Site Level Plan		R620114A
Renewable Energy Plan		R620115
Ecology Mitigation Plan		R620116
Boundary Treatment Plan		R620112
Noise Impact Assessment	GL Hearn	GH/006988 R01

### 2.3 Additional documents

A lighting plan will also be produced for the works. We understand that the lighting plan will show a darker corridor at the southern site boundary adjacent to the railway line, for the use of foraging bats and other nocturnal wildlife. A full drainage strategy will also be produced for the scheme and an update noise impact assessment.

## 3. SITE BASELINE AND CONNECTIVITY

3.1 The site comprises 2 existing blocks of flats, hardstanding, amenity grassland and parkland. There is connectivity for fauna to the wider landscape via the railway line and scrub adjacent to the southern site boundary. Within the site, there is minimal connectivity via scattered broadleaved trees and a species-poor hedgerow at the western site boundary. The wider landscape is primarily residential and commercial properties within the town of Rhyl. The coast of the Irish sea was 0.6 km to the north, Kinnel bay was approximately 3.5km to the west and Prestatyn approximately 3 km to the east. Figure 3.1 shows the site context.



**FIG. 3.1: SITE CONTEXT, APPROX. OUTLINE IN RED.**

BASE IMAGE © 2025 AIRBUS, BLUESKY, INFOTERRA LTD & COWI A/S, MAXAR TECHNOLOGIES, MAP DATA © 2025

- 3.2 There is no public access within the development footprint. There is a footpath adjacent to the eastern site boundary but no public footpaths within the existing site.
- 3.3 There is a 300mm public combined sewer originating in the eastern extent of the site flowing east. There are also public foul and surface water sewers serving surrounding residential properties to the north-west of the site. All surface water currently drains to the existing public combined sewer in the site's north-eastern extent. The impact of foul flows generated by the proposed development have been considered as part of the scheme, and it has been concluded that flows can be accommodated within the public sewerage system.
- 3.4 The only habitat of principal importance in Wales (HPI) on the site was a small area of native-species hedgerow at the western site boundary, which was of poor quality due to the lack of understorey and ground vegetation. The scattered trees potentially provided habitat for nesting birds and foraging bats. The habitat piles of rubble and disused furniture could provide potential habitat for sheltering reptiles and amphibians. The amenity grassland was not of significant ecological value but provided a small area of cover for commuting fauna. Further ecological surveys have been recommended to assess whether bats and nesting birds are present prior to the works. Specific mitigation recommendations have been provided within the Mitigation and Conservation Plan.
- 3.5 Invasive non-native species observed onsite were single stands of montbretia and wall cotoneaster. A Biosecurity Risk Assessment has been provided with operational procedures to remove and minimise the risk of spreading these species as a result of the works.

## 4 SUMMARY OF GREEN INFRASTRUCTURE PROPOSALS

4.1 As set out in PPW 12, paragraph 6.4.21, the impacts on habitats and species from a proposed development should be treated in a step-wise manner. Table 4.1 summarises how the proposed works at Maes Emlyn have adopted these step-wise principles and details the Green Infrastructure contribution of the proposed scheme. The Green Infrastructure contribution proposed is considered to be proportionate to the proposed development. This is best read in conjunction with the Mitigation and Conservation Plan and the landscape design documents.

**TABLE 4.1: SUMMARY OF GREEN INFRASTRUCTURE PROPOSALS FOR MAES EMLYN, RHYL**

Step-Wise Stages	Summary of Project Proposals
Avoidance	<ul style="list-style-type: none"> <li>Most of the development is situated on areas of hardstanding within the footprint of the existing buildings and amenity grassland of relatively low value. While some trees will be lost, the retained and enhanced open areas have been sited to retain existing features as far as possible.</li> <li>As many as practicable of the large, mature trees on the site and adjacent to it will be retained and root zones protected. No trees containing bat roosting features will be removed.</li> <li>Root protection fencing will be erected to prevent damage to large mature trees.</li> <li>The existing hedgerow to the west will be retained.</li> <li>The lighting plan will show that the scheme lighting design will create and maintain a 'dark corridor' to avoid lighting impacts at the southern site boundary, particularly on the trees (but also other features and enhanced areas) which are currently unlit.</li> <li>Wherever possible, walls, piles of stones and piles of wood will be retained.</li> <li>Strict biosecurity measures will be followed to avoid any additional biosecurity impacts, including mitigation for the spreading of invasive non-native species.</li> </ul>
Minimisation	<ul style="list-style-type: none"> <li>The scheme retains the pre-existing site boundaries with attendant walls and fencing. This minimises the changes to the structure of the site e.g. flight lines for bats, or alterations to routes for animals to cross the site.</li> <li>Non-vegetated areas (e.g. hardstanding) within the designed scheme have been kept as minimal as possible accounting for regulations regarding the number of dwellings, including road turnabouts and parking provision.</li> <li>The built-up areas are largely sited towards the centre of the site, minimising impacts to the site boundaries which provide potential corridors for wildlife.</li> <li>Any impacts on wildlife on the site will be minimised through strict adherence to mitigation procedures set out in the Ecological and Arboricultural reports; including timing works to avoid the nesting bird season, and when animals are active. Protection of sensitive tree zones and habitats with fencing, and surveys if needed. These will be followed at all times.</li> </ul>
Mitigation and/or Restoration	<ul style="list-style-type: none"> <li>The need for mitigation and restoration is limited by the low value of the habitats lost, the only significant wildlife habitat impacted is the existing buildings, with regards to bat and nesting birds features, and the mature trees and hedgerow.</li> <li>Invasive non-native species (INNS) removal of montbretia and cotoneaster species will take place prior to the works, as per the Biosecurity Risk Assessment.</li> <li>Specific species mitigation (in the Mitigation and Compensation Plan) will be implemented. <ul style="list-style-type: none"> <li>Removal of habitat piles will only be undertaken if temperatures are above 10 °C and will be carried out by hand.</li> <li>Further survey works for bats and nesting birds will take place prior to the works commencing, and the results of this work will be used to inform further</li> </ul> </li> </ul>

Step-Wise Stages	Summary of Project Proposals
	mitigation if necessary which may include the creation of buffer zones, adaptation of plans and species protection licenses as needed.
Compensation	<ul style="list-style-type: none"> <li>• Compensatory habitat creation will include tree and hedgerow planting and the creation of a SUDS drainage area surrounded by wildflower and grassland meadow. <ul style="list-style-type: none"> <li>○ This is in order to compensate for the loss of amenity grassland, some damaged trees, and boundary features where unavoidable.</li> </ul> </li> <li>• There will be a limited loss of grassland area, due to most of the construction taking place within the footprint of previously demolished buildings, but the design features significant areas of wildflower planting, resulting in overall much increased species diversity.</li> <li>• A minimum of 10 inbuilt bird boxes will be incorporated into the new building designs to compensate for the loss of potential bird nesting habitat within the existing buildings and trees proposed for removal.</li> <li>• A minimum of 10 inbuilt bat boxes will be incorporated into the new building designs to compensate for the loss of potential bat nesting habitat within the existing buildings.</li> </ul>
Enhancement	<ul style="list-style-type: none"> <li>• The scheme includes multiple areas of new habitat creation and enhancement to existing habitats, this has been targeted at species likely to use the area and habitats which are both appropriate to the conditions, valuable, and likely to be used, including considering connectivity of other habitat to the site: <ul style="list-style-type: none"> <li>○ Native species hedgerow will be created within the site including at the eastern boundary, while retaining the existing habitat features.</li> <li>○ Significant native tree planting will take place around and supplementary to the mature trees, and scattered further throughout the site.</li> <li>○ Below this will be a significantly more diverse shade tolerant grassland mix with wildflowers, creating a more diverse woodland understorey flora.</li> <li>○ The open areas in the centre will be enhanced with specific wildflower planting resulting in a much less grass-dominated and more diverse grassland. The scheme will result in four such meadow areas newly created within the site.</li> <li>○ The proposed ornamental planting will provide flowers for pollinating insects.</li> </ul> </li> <li>• The scheme also includes features for animals, including: <ul style="list-style-type: none"> <li>○ A minimum of 4 swift boxes to be installed on the buildings</li> <li>○ A hibernaculum for reptiles and amphibians</li> <li>○ Hedgehog highways at the site boundaries, to maintain access for hedgehogs between the site and the wider landscape</li> </ul> </li> <li>• Where feasible (given drainage constraints), all planting will be appropriate native species, or in rare occasions species chosen for natural benefits such as providing nectar for pollinating insects.</li> <li>• Ongoing management will be implemented to ensure that the habitats remain valuable.</li> </ul>

4.2 The proposed scheme will provide new affordable housing units for local people. The development is intended to be in proportion to the assessed requirement for the area, and to provide needed capacity while avoiding developing any more greenfield area than is necessary.

4.3 The scheme has been designed with sustainability and energy efficiency as a key design goal including considerations of layout and orientation as well as materials and design, incorporating both passive solar gain and active solar panels on all buildings, energy efficient double glazing, high thermal properties to reduce heat loss, energy efficient heating and hot water systems, low energy light fittings will be used within all the properties and external drying areas. Materials will be selected from local sources wherever possible to minimise transport energy use and help sustain the local economy.

- 4.4 It has been demonstrated in the transport statement that the development is sustainable with good accessibility to the site provided to those travelling by foot, bicycle and public transport. There are well-connected bus routes and rail links in addition to connectivity via the A55.
- 4.5 The outline drainage strategy incorporates various SUDS features in order to meet the water quality, amenity and biodiversity requirements, through use of a mixture of filter strips, roadside raingardens, a swale, an attenuation basin and various raingardens. An attenuation basin within the north-western corner of the site, in combination with below ground cellular tanks and the reservoir layers associated with porous paving, will provide the required storage volume.
- 4.6 The noise impact assessment identified that noise mitigation measures are required due to the proximity of the railway line to the south of the site. The design of the buildings will incorporate sound insulation glazing and measures to the external façade and roof construction. Externally, it is proposed that a noise mitigation barrier is constructed at the southern site boundary to reduce the noise levels within the adjacent properties. Further consideration is needed as to whether the location of the noise barrier will conflict with proposed hedgehog highways and access for fauna onto the railway line, which provides a valuable habitat corridor for wildlife. It is anticipated that discussion with a Secure by Design Officer will take place to assess the stability and security of the existing fence and an update noise impact assessment report will be produced prior to the full planning application.
- 4.7 The scheme includes numerous areas of habitat creation to provide ecological value, including native-species hedgerows, tree planting and four areas of grassland and wildflower meadow. This provides additional habitats for species in the wider landscape and the scheme will result in an overall increase of habitat structure and diversity, as well as species richness. The landscape design is also intended to provide natural features for residents, with trees likely to increase, for example, bird species visible.

## 5 STATEMENT

- 5.1 The proposed development at Maes Emlyn, Rhyl will provide additional affordable houses to support the local community. As shown in this document, the scheme has been designed taking a step-wise approach to impacts on habitats and species, and ecological enhancement will be provided through the creation of new habitat, particularly tree planting, wildflower areas and hedgerows, and minimising the losses to the existing value of the site. The habitats which will be lost are largely relatively low value amenity grassland, buildings, hardstanding and scattered trees. Loss of mature trees will be avoided as far as possible.
- 5.2 The site will be enhanced by planting areas of wildflowers, hedgerows, and native trees, which will increase habitat structural diversity. The grassland areas will be managed to maintain them as meadows. The area in the south-eastern corner of the site will be largely free from any disturbance and a reptile hibernaculum will be constructed. Connectivity across the site will be enhanced via new hedgerows and hedgehog highways. Additional enhancements include bat and bird boxes to be incorporated within the new buildings.
- 5.3 Any ecological constraints on the scheme will be managed sensibly and sustainably in order to minimise any potential harm and provide enhanced habitat for these species and any compensatory measures necessary. The primary areas where direct impacts on wildlife are a possibility are potential impacts on bats and nesting birds. The need for this is accounted for in planning for the scheme, and appropriate surveys and actions will be taken at appropriate times. Works will be done under the direction of appropriately skilled ecologists at appropriate times of year.
- 5.4 Planning Policy Wales identifies the importance of *“paying due regard to the potential for continued long term maintenance and management of retained areas to benefit biodiversity”* (PPW12, paragraph 6.4.15). It is always recommended that a plan identifying the proposed maintenance and management of habitats and species features (in addition to other Green Infrastructure components as required) be produced at an appropriate stage. A detailed plan for the ongoing management of the landscape featured in the scheme has been created and submitted as part of the application.

## REFERENCES

Denbighshire County Council. (2014). 'Denbighshire County Council Local Development Plan 2006 – 2021'. Available: <https://www.denbighshire.gov.uk/en/planning-and-building-regulations/local-development-plan/adopted-local-development-plan.aspx>

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