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Consideration of the National Planning Policy for Chapter 6 of Planning Policy Wales – Distinctive and Natural Places – The Stepwise Approach

Introduction

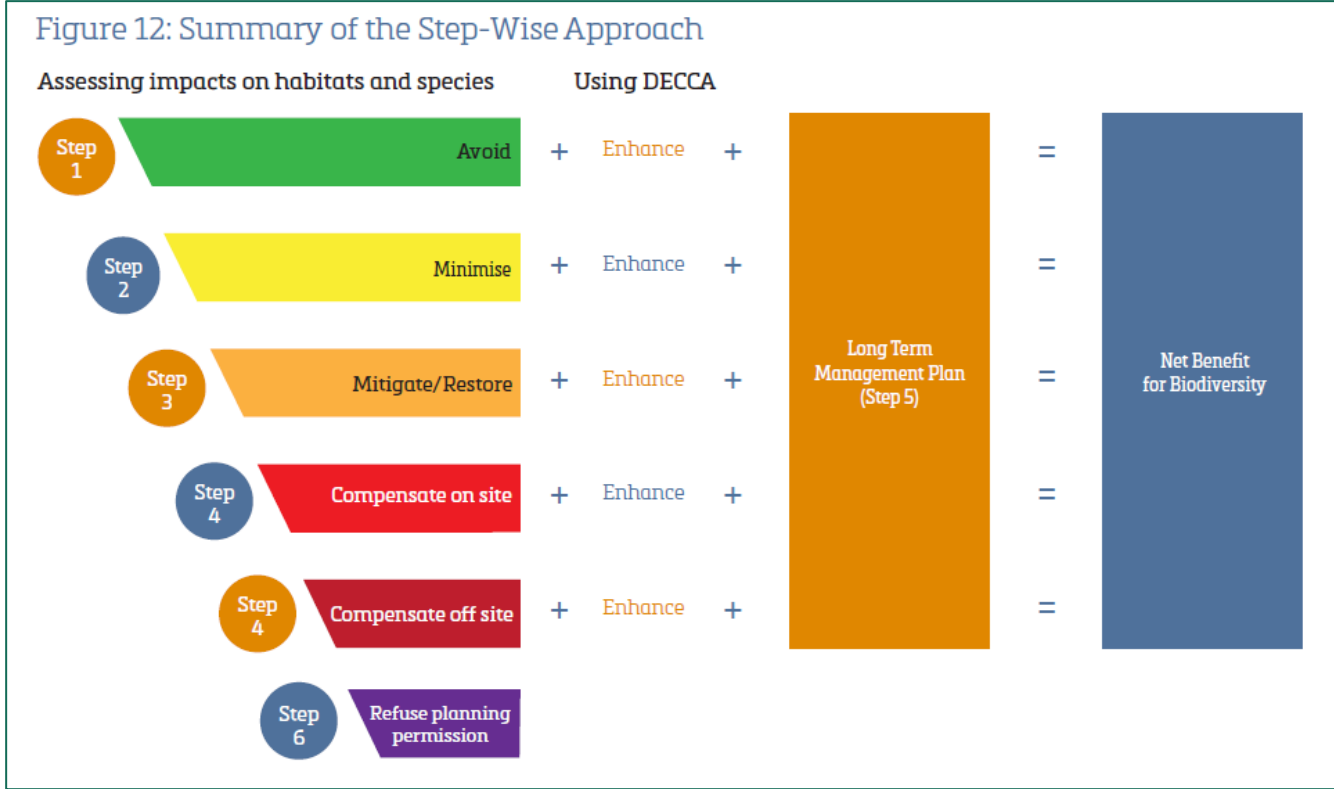
- 1.1 This ‘Green Infrastructure Statement’ (GIS) has been prepared to support a planning application for a proposed development at the site of Ty Gwynn Jones in Abergele, Wales (hereafter referred to as the ‘Site’). The proposals include the demolition of the former nursing home to support a redevelopment of two apartment blocks within the existing Site boundary.
- 1.2 The Welsh Government (WG) Minister for Climate Change Julie James wrote to the heads of the planning authorities in Wales on 11 October 2023 informing them of a finalised policy for Chapter 6 ‘Distinctive and Natural Places’, to be included in the next iteration of Planning Policy Wales Edition 12 (PPW 12). PPW 12 was subsequently issued on 04 February 2024.
- 1.3 PPW 12 sets out the land use planning policies of the WG and the primary objective of PPW 12 is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015¹, the Well-being of Future Generations (Wales) Act 2015² and other key legislation and resultant duties such as the Socio-economic Duty³.
- 1.4 This GIS has been prepared to demonstrate how green infrastructure has been incorporated into the proposals.

Net Benefit for Biodiversity and the Step-wise Approach

- 1.5 PPW 12 (Paragraph 6.4.11) advises 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 minimized, 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.
- 1.6 PPW 12 expands on the approach to decision-making with regard to development and nature conservation previously set out in Technical Advice Note 5 (TAN5): Nature Conservation and

Planning (2009)⁴. TAN5 details a five-point approach to decision-making including; information, avoidance, mitigation, compensation and new benefits.

- 1.7 The step-wise approach updated within PPW 12 is summarised in the graphic below extracted from Figure 12 of PPW 12.



- 1.8 The step-wise approach is a means to demonstrate that actions have been taken to provide a net benefit for biodiversity and to promote ecosystem resilience through following attributes included within the ‘DECCA Framework’. Attributes identified within the ‘DECCA Framework’ include:
- **Diversity** - between and within ecosystems;
 - **Extent** - scale of ecosystems;
 - **Condition** - state of ecosystems including their structure and functioning;
 - **Connections** - between and within ecosystems; and
 - **Adaptability** - ecosystems ability to adapt to, resist and recover from a range of pressures.

¹ Planning (Wales) Act 2015 (anaw 4) (July 2015) (PWA 2015). National Assembly for Wales [Online] - <https://www.legislation.gov.uk/anaw/2015/4/contents>

² Well-being of Future Generations (Wales) Act 2015 (June 2015). Welsh Government [Online] - <https://www.gov.wales/well-being-future-generations-act-essentials-html>

³ The Socio-economic Duty (May 2020). Welsh Government [Online] - <https://www.gov.wales/socio-economic-duty-overview>

⁴ Technical Advice Note 5 (TAN5): Nature Conservation and Planning (September 2009). National Assembly for Wales [Online] - <https://www.gov.wales/sites/default/files/publications/2018-09/tan5-nature-conservation.pdf>

Understanding the Wider Ecological Context

- 1.9 The State of Natural Resources Report (SoNaRR)⁵ and the Natural Resources Wales (NRW) Area Statement for North West Wales⁶ provide contextual information about the pressures on nature in the area within and surrounding the Site and the priorities for improving the resilience of local ecosystems.
- 1.10 The NRW Area Statement for North West Wales has two cross cutting themes and four other themes:
- Ways of working;
 - Climate and nature emergency;
 - Reconnecting people and nature;
 - Encouraging a sustainable economy;
 - Supporting sustainable land management; and
 - Opportunities for resilient ecosystems.
- 1.11 The proposed development has the potential to deliver on some of these themes and thereby assist in the delivery of Sustainable Management of Natural Resources (SMNR) in Wales.

Pre-application surveys – the “information” stage of the step-wise approach.

- 1.12 A daytime Preliminary Roost Assessment (PRA) of a single structure within the Site (building B1) was undertaken by an Arbtech ecologist on 11 February 2025. Detailed methods are provided in the Preliminary Ecological Appraisal (PEA) report (Arbtech, 2025).
- 1.13 An extended UK Habitat (UKHab) survey was completed by a TEP ecologist on 03 June 2025 and extended to assess the Site for suitability to support notable species. Detailed methods are provided in the Ecological Impact Assessment (EclA) Report (TEP Ref: 11137.003).
- 1.14 Nocturnal bat emergence surveys led by TEP ecologists of B1 were undertaken 17 June 2025 and 15 July 2025. A potential roost features (PRF) inspection survey was undertaken of a single tree (T2) by a TEP bat licensed ecologist, supported by a TEP consultant ecologist on 22 July 2025. Detailed methods are provided in the Bat Survey Technical Report (TEP Ref: 11137.002).
- 1.15 The results of these surveys informed the:
- Design and layout of built aspects of the development
 - Approach to habitat retention and creation across the Site
 - Mitigation and enhancement for protected and priority species and habitats found on or adjoining the Site

⁵ State of Natural Resources Report (SoNaRR) for Wales (December 2020). Natural Resources Wales [Online] - <https://naturalresources.wales/sonarr2020?lang=en>

⁶ North West Wales Area Statement (August 2023). Natural Resources Wales [Online] - <https://naturalresources.wales/about-us/what-we-do/strategies-and-plans/area-statements/north-west-wales-area-statement/?lang=en>

Assessing Impacts on Habitats and Species

Habitats and Flora

Designated Sites and Priority Habitats

- 1.16 There are no statutory nature conservation Sites within or adjacent to the Site and therefore direct impacts on statutory designated Sites have been avoided.
- 1.17 The following non-statutory designated Sites were identified within 1km of the Site:
- Abergele grazing marsh LWS (Candidate), 0.5 km northeast;
 - Berthglyd Pond LWS (Candidate), 0.5 km northeast;
 - Pwll Tan-y-bryn LWS (Candidate), 0.8 km southeast;
 - Pentre Mawr Park Pools & Reedbed LWS (Candidate), 0.9 km northwest; and
 - Ffordd Las LWS (Candidate) 1 km south.
- 1.18 No priority habitats identified for the purpose of maintaining and enhancing biodiversity in Wales as detailed under Section 7 (S7) of the Environment (Wales) Act 2016⁷ are located within or adjacent to the Site. Priority S7 habitats that are located within 1 km of the Site predominantly include areas of ancient semi-natural woodland and restored ancient woodland with scattered native hedgerows (non-ornamental/residential hedges) as illustrated on the NRW Interactive Map Viewer⁸.

On-site Baseline

- 1.19 Habitats within the Site provide limited biodiversity value as the Site is predominantly hard standing and built structures. Habitats include sections of mown amenity garden areas with associated introduced shrub planting to the north, east and west. There are 11 trees within the Site mainly growing around the boundary within or adjacent to introduced shrub and hedge planting.
- 1.20 A Lawsons cypress *Chamaecyparis lawsoniana* dominated hedgerow is present along the eastern boundary. There is also a line of Lawsons cypress trees occupying the southern boundary of the Site. Two small sections of native hedgerow are present along the northern boundary and to the east of the northern vegetated garden section. *Cotoneaster* sp. was identified within the Site, which is listed as an invasive non-native species (INNS) under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).
- 1.21 The Site is not within a Conservation Area, and the trees are not protected by a Tree Preservation Order. Habitats adjacent to the Site and within the surrounding locality are the same as those within the Site, including mainly residential development with associated gardens, trees and

⁷ Environment (Wales) Act 2016 (anaw 3) Part 1 Section 7 (May 2016). National Assembly for Wales [Online] - <https://www.legislation.gov.uk/anaw/2016/3/section/7>

⁸ Natural Resources Wales Interactive Map Viewer [Online] - https://experience.arcgis.com/experience/dd852f0e12864928973e3e165a1b4631/page/English/?views=Layers#data_s=id%3AdataSource_2-cb1bd73817c24a67992e3201be3d5f1c-5aa28ecb4c2740c391bba8ac3a1d066a%3A93403

hedges. Within the wider landscape there are areas of broad-leaved woodland and arable land with associated boundary hedgerows and trees to the south and east and coastal habitats associated with Liverpool Bay to the northwest.

Fauna

On-site Baseline

- 1.22 Given the sub-urban location and the limited habitats present, fauna associated with the Site is likely to include common and widespread transient species e.g., bats, birds, invertebrates and small mammals that can utilise the buildings and mosaic of sub-urban gardens within the locality for refuge, foraging and commuting. Examples of priority species that may use the Site as part of local sub-urban habitat network, as identified under S7 of the Environment (Wales) Act 2016 include:
- Black-headed gull *Larus ridibundus*;
 - Brown long-eared bat *Plecotus auritus*;
 - Common pipistrelle *Pipistrellus pipistrellus*;
 - Dunnock *Prunella modularis*;
 - Hedgehog *Erinaceus europaeus*;
 - Herring gull *Larus argentatus*;
 - House sparrow *Passer domesticus*;
 - Song thrush *Turdus philomelos*;
 - Soprano pipistrelle *Pipistrellus pygmaeus*; and
 - Starling *Sturnus vulgaris*.
- 1.23 The PEA report (Arbtech, 2025) identified no signs of use of buildings or trees within the Site by roosting bats. However, suitable features to support bat roosting were identified and building B1 was assessed as having moderate suitability to support roosting bats, in accordance with the Bat Conservation Trust (BCT) 2023 Guidelines⁹. Tree T2, a wild cherry tree *Prunus avium*, was identified during the PRA as having a PRF on its southern aspect (Arbtech, 2025).
- 1.24 The EcIA Report (TEP Ref: 11137.003) undertaken by TEP concluded the Site has little value for protected or notable species. No bat emergence was observed during both emergence surveys, and no residual evidence was identified on or in T2 during the PRF inspection survey. The Site provides limited suitable habitat for bats however the trees and hedgerows provide some connectivity to areas of suitable habitat. Common pipistrelles were recorded commuting and foraging within the Site during surveys which is a common and widespread species of no more than Site level value.

⁹ Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists Good Practice Guidelines (4th edition). The Bat Conservation Trust, London. ISBN-978-1-7395126-0-6

- 1.25 Suitable bird nesting habitat was identified as being provided by the trees and hedgerows present within the Site which would support the more common nesting bird species and provide opportunities for foraging.
- 1.26 Where potential bird nesting and bat roosting habitat requires removal i.e., buildings, introduced shrubs and trees, there will be minor impacts on these ecological features resulting from the proposed development.
- 1.27 Whilst impacts on invertebrates, foraging small mammals e.g., hedgehog and garden birds e.g., dunnoek may occur as a result of the removal of habitats to facilitate development, these are likely to be minor due to the abundance of similar habitats in the locality.

Avoidance and Minimising Measures

Habitats and Flora

- 1.28 The existing boundary hedge and introduced shrubs along the northern boundary, and conifer hedge to the south of the Site, will be retained and managed during construction. The stone boundary wall to the north and seven trees are to be retained with boundary habitats enhanced in the east with new hawthorn *Crateagus monogyna* and *Euonymus japonicus* hedge planting.
- 1.29 Retained trees and hedgerows should be protected from accidental damage during Site clearance and construction, and a Root Protection Zone (RPZ) should be implemented around retained trees in accordance with BS5837:2012 if development is likely to affect any further trees, their roots, and overhanging canopies.
- 1.30 An Invasive Species Management Plan for *Cotoneaster sp.* should be produced and implemented including measures to remove this species to provide net benefit for biodiversity and to prevent its spread during the construction period.

Mitigation and Compensation Measures

Habitats and Flora

- 1.31 Floral diversity of the development footprint is low, and species are those typically associated with the habitats on site. None of the species recorded during the survey are protected by the Wildlife and Countryside Act 1981 (as amended) or listed under Section 7 of the Environment (Wales) Act 2016. In addition, no nationally or locally rare species were recorded.
- 1.32 Four trees in total are to be removed however the proposed landscape scheme incorporates a range of tree, hedge and shrub planting throughout the Site, including native and wildlife beneficial species. Proposed planting includes two ornamental crab apple *Malus 'Red Sentinel'*, two hawthorn and one Japanese cherry *Prunus 'Amanogawa'* extra heavy standard trees; hawthorn and *Euonymus japonicus* hedgerows together with ornamental shrub planting, wildflower areas and amenity grass margins.

- 1.33 These measures will increase structural diversity throughout the Site and provide additional opportunities for foraging, shelter and nesting for a range of fauna. The incorporation of plant species selected for their nectar, pollen, fruit and seed producing characteristics will also enhance habitat functions for invertebrates, birds and small mammals.

Fauna

Bats

- 1.34 Building B1 will be demolished to facilitate the proposals, which will result in the loss of potential bat roosting resources within the locality. Surveys did not confirm the presence of roosting bats within the Site however common pipistrelles were recorded commuting and foraging (TEP Ref: 11137.003). Loss of trees and shrubs within the Site will result in the minor loss of small areas of bat foraging habitat forming part of the wider mosaic of sub-urban gardens. The retained existing hedgerows, shrubs and trees, new wildflower areas and replacement shrub, hedge and tree planting will compensate for the loss of existing habitats and maintain the function of the Site for the limited number of bats recorded foraging within the locality by providing habitat for invertebrates.
- 1.35 In addition, the lighting design for the proposed development will be designed to avoid unnecessary illumination of retained and created habitats. Where practicable, lighting will be directional, of low intensity and controlled through timers or motion sensors to minimise impacts on commuting and foraging bats and other nocturnal wildlife.

Birds

- 1.36 Loss of trees within the Site will result in the loss of potential bird nesting habitat. Loss of potential bird nesting habitat will be mitigated and compensated for through the provision of additional shrub, hedge and tree planting. To minimise impacts on nesting birds, vegetation clearance will be undertaken outside the bird nesting season (March to August inclusive). Where this period cannot be avoided, a nesting bird check will be undertaken a maximum of 24 hours in advance of vegetation clearance works.

Enhancement – the “Net Benefit” stage of the step-wise approach

- 1.37 A sustainable drainage system (SuDS) in the form of rain gardens and a swale will be sown with a wildflower and grassland meadow mixture, allowing for the natural colonisation by plants.
- 1.38 The proposed landscape planting will enhance habitat functions within the Site by providing seasonal and evergreen foliage and creating a variety of habitat niches including tree canopies, hedge and shrub cover, seed and pollen producing grasses and flowers. Tree and hedge species included within the proposals will include species providing nectar and pollen for bees and the many other types of pollinating insects.
- 1.39 Non-native *Cotoneaster* will be removed to prevent its spread within the Site.
- 1.40 Enhancement for foraging and commuting bats and nesting birds will be delivered within the new development through the provision of a diverse planting scheme.

Ecosystem Resilience and the DECCA Framework

- 1.41 The proposals have been designed to maintain ecosystem function and support biodiversity through their siting, scale and layout. The resilience of ecosystems supported by the Site have been considered through the DECCA Framework:
- **Diversity** – a variety of native and introduced planting will be incorporated within the proposals to support biodiversity within the Site locality;
 - **Extent** – habitats will be maintained within the Site;
 - **Condition** – the condition of created habitats will be maintained through long-term management, and could be secured through a Landscape Management Plan (including like for like replacements of any failed plants for a period of at least 10 years);
 - **Connectivity** – ecological connectivity through the site will be maintained and enhanced through habitat retention and creation in locations to that currently in situ; and
 - **Adaptation** – incorporating a variety of native and cultivar flora species with deciduous and evergreen characteristics will maintain habitat cover throughout the seasons.

Green Infrastructure

- 1.42 PPW 12 (Paragraph 6.0.3) notes that Distinctive and Natural Places must maintain or incorporate Green Infrastructure (GI) as key components of the natural environment and built fabric.
- 1.43 PPW 12 (Paragraph 6.2.1) notes the components of GI that may be present at local or smaller scales (the scales of GI applicable to development proposals, rather than landscape-scale GI).
- 1.44 The proposed landscape scheme incorporates a variety of GI components including native and ornamental tree planting, hedge planting, retained habitats, rain gardens and wildflower planting areas. These features will contribute to the multifunctional role of GI by providing biodiversity, visual amenity and surface water management benefits within the site. The proposed rain gardens will support sustainable drainage functions whilst also providing additional planting areas and habitat opportunities for invertebrates and other wildlife.
- 1.45 Replacement planting will not be incorporated at the PPW12 compensation planting ratio of 3:1, however the retention of existing vegetation and incorporation of additional diverse planting around the site will serve a similar function.
- 1.46 The proposed planting specification includes a range of species selected to provide seasonal interest and wildlife value. Tree, hedge and shrub planting will provide nectar, pollen, fruit and berry resources throughout the year, supporting pollinating insects and other fauna. The incorporation of native species alongside suitable ornamental species will enhance habitat diversity and contribute to the long-term ecological function of the site whilst complementing the character of the surrounding landscape.
- 1.47 Ecological mitigation and enhancement measures integrated into the proposed development will maintain and strengthen ecosystem function and ecological connectivity across the Site. The retention of existing habitats, additional landscape planting, and incorporation of biodiversity

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enhancement features throughout the development will contribute to the provision of net benefits for biodiversity, in accordance with the requirements of PPW 12.