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GREEN INFRASTRUCTURE STATEMENT

At

Land off St George's Road
St George's Road
Abergele
Conwy

NGR: SH 95408 77038

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1 INTRODUCTION

1.1 Author and qualifications

This report is compiled and written by Harry Fox BSc MRes ACIEEM, UES Ecologist.

This report has been reviewed and approved by Tom Kenwright BSc MSc MCIEEM, UES Senior Ecologist. Tom holds a level 6 Botanical Society for Britain and Ireland (BSBI) field identification skills certificate (FISC). Level 6 is only awarded in exceptional circumstances where the surveyor is a very competent professional field botanist and is of national status. Tom is licensed by Natural Resources Wales to disturb all species of bat and take or handle all species other than greater or lesser horseshoe under licence number S094176/1. Tom is licensed by Natural Resources Wales to disturb, take and handle great crested newts *Triturus cristatus* under licence number S095290/1.

1.2 Proposed development

The proposals are for a residential development on Land off St George's Road, Abergele, Conwy ("the site"). The scheme comprises new dwellings with a vehicular access from St George's Road, internal estate roads, a pumping station, a sustainable drainage attenuation basin, public open space and a Local Equipped Area for Play (LEAP). The site is a single field of approximately 4.2 ha.

The site forms the southern part of a larger area of land (approximately 15.1 ha) that was originally surveyed by UES. Following the initial surveys, the development boundary was reduced to this southern field. Where the survey reports cover the wider area, this statement draws only on the information relevant to the current site.

This statement has been prepared to accompany the pre-application consultation on the proposals and is based on the following drawings:

- Site Layout Phase 6, drawing BD_ABRGL_SL02 Rev D (Castle Green Homes, 10/09/2026).
- General Arrangement, drawing UG_3419_LAN_GA_DRW_101 Rev P02 (Urban Green, 05/11/2026).
- Planting Plan, drawing UG_3419_LAN_SL_DRW_301 Rev P02 (Urban Green, 05/11/2026).
- Landscape Supporting Notes, drawing UG_LAN_LSN_DRW_310 Rev P02 (Urban Green, 05/11/2026).

Where this statement recommends changes to the landscape proposals, these can be incorporated into the landscape drawings following the pre-application consultation, or secured through a detailed landscaping scheme at the planning condition stage.

1.3 Report objectives

UES was commissioned by Castle Green Homes Ltd to prepare a green infrastructure statement for the proposed development. The purpose of this document is to:

- Identify the existing green infrastructure on and adjacent to the site.
- Demonstrate how the step-wise approach has been applied to avoid, minimise, mitigate and compensate for effects on biodiversity and green infrastructure.
- Set out how new and enhanced green infrastructure will be integrated into the scheme to maintain connectivity and contribute to resilient ecological networks.
- Show how the scheme can deliver a net benefit for biodiversity, and how this will be secured through long-term management.

1.4 Information sources

This statement draws on the following reports, which should be read alongside it:

- UES (2026a). Preliminary Ecological Appraisal, Land off St George's Road, Abergele. Report reference UES05204/01, V2, 23rd October 2026.
- UES (2026b). Wintering Bird Survey, Land off St George's Road, Abergele. Report reference UES05204/03, V2, 23rd October 2026.
- UES (2026c). Bat Ground Level & Aerial Tree Assessment, Land off St George's Road, Abergele. Report reference UES05204/06, V2, 23rd October 2026.
- mdlandscape (2026). Arboricultural Impact Assessment and Method Statement, Land at Bryn Derw, St George Road, Abergele. Report reference 442/R/200, Rev P02, November 2026.

Tree references in this statement follow the tag numbers used in the arboricultural and bat tree assessments. Hedgerow references follow the Preliminary Ecological Appraisal (PEA).

2 LEGISLATION AND PLANNING POLICY

2.1 Planning Policy Wales

The Welsh Government published Planning Policy Wales (PPW) Edition 12 in February 2024. It includes a revised Chapter 6, 'Distinctive and Natural Places', which strengthens national policy on green infrastructure, net benefit for biodiversity and the protection of trees and woodland.

PPW paragraph 6.2.1 defines green infrastructure as *'the network of natural and semi-natural features, green spaces, rivers and lakes'* that intersperse and connect places. It explains that green infrastructure functions at different scales: from whole ecosystems and connected habitat networks at the landscape scale, through parks, ponds, public rights of way, allotments, gardens and sustainable drainage systems at the local scale, to street trees, hedgerows and green roofs at the smallest scale.

Paragraph 6.2.12 states that *'a green infrastructure statement should be submitted with all planning applications'*. The statement should be proportionate to the scale and nature of the development and describe how green infrastructure has been incorporated into the proposal. It should demonstrate positive multifunctional outcomes appropriate to the site and must be used to demonstrate how the step-wise approach (paragraph 6.4.15) has been applied.

PPW requires development to deliver a net benefit for biodiversity, leaving biodiversity and the resilience of ecosystems in a significantly better state than before (paragraph 6.4.5). Ecosystem resilience is considered against five attributes, known as the DECCA framework: diversity, extent, condition, connectivity and adaptability to change. Paragraph 6.4.11 requires enhancement to be secured *'over and above that required to mitigate or compensate for any negative impact'*.

The step-wise approach (paragraph 6.4.15 and Figure 12 of PPW) sets out the sequence that must be followed to maintain and enhance biodiversity and deliver a net benefit:

1. Avoid, including avoiding statutory designated sites, where development is unacceptable in principle
2. Minimise
3. Mitigate / restore, including on-site compensation where like-for-like mitigation or restoration is not possible
4. Compensate off site, as a last resort
5. Long-term management plan, to accompany each stage

The final step is to refuse planning permission where the adverse effect on biodiversity and ecosystem resilience clearly outweighs other material considerations.

PPW also gives ancient woodland and ancient and veteran trees strong protection from development that would result in their loss or deterioration, unless very exceptionally there are significant and clearly defined public benefits (paragraph 6.4.43). Where the loss of trees is unavoidable, paragraph 6.4.42 requires compensatory planting at a minimum ratio of three trees of a similar type and compensatory size for every tree lost.

2.2 Legislation

Section 6 of the Environment (Wales) Act 2016 places a duty on public authorities, including local planning authorities, to seek to maintain and enhance biodiversity and promote the resilience of ecosystems in the exercise of their functions. Section 7 of the Act requires the Welsh Ministers to publish a list of the habitats and species of principal importance for the purpose of maintaining and enhancing biodiversity in Wales, which includes hedgerows. The list was revised in 2026 (Welsh Government, 2026).

The protected species legislation relevant to the site, including the Conservation of Habitats and Species Regulations 2017, the Wildlife and Countryside Act 1981 and the Protection of Badgers Act 1992, is set out in the PEA and is not repeated here.

2.3 Local policy

The Conwy Local Development Plan (LDP) 2007-2022, adopted in October 2013, remains the development plan for the area until the Replacement LDP (2018-2033) is adopted. Relevant policies include Strategic Policy NTE/1 The Natural Environment and Policy NTE/3 Biodiversity. These are supported by Supplementary Planning Guidance LDP5 Biodiversity in Planning (2014) and LDP40 Trees and Development (2017).

3 SITE CONTEXT AND BASELINE

3.1 Site context

The site lies on the south-eastern edge of Abergele, immediately north of St George's Road. It comprises a single field of species-poor modified grassland, which showed evidence of grazing by sheep and cattle at the time of the PEA survey, on flat to gently rolling ground. Most of the field is enclosed by hedgerows, a line of trees and small areas of scrub, with mature trees along several boundaries. There are no trees within the field itself.

The northern boundary is formed by a species-rich hedgerow (H5) containing mature oaks, beyond which is a further field outside the site. The eastern boundary is formed by native hedgerows (H3 and H9), adjoining farmland to the north-east, a small area of mixed scrub and the grounds of the neighbouring hotel to the east. The south-eastern edge of the site is not marked by a hedgerow and adjoins the land at Bryn Derw. Part of the short southern boundary with St George's Road is formed by hedgerow H8, which includes a large sessile oak with veteran characteristics (T689). The western boundary is formed by hedgerows H6 and H7 and a line of trees, beyond which a public footpath runs north to south between St George's Road and Rhuddlan Road alongside a small stream.

Residential areas of Abergele lie to the west of the site. The A55 runs to the north and north-east, beyond which lies the extensive wet grassland of Abergele Grazing Marsh Site of Importance for Nature Conservation (SINC). To the south and south-east, the landscape is a mosaic of pasture and arable fields divided by hedgerows and treelines, with larger blocks of woodland at Coed Abergele to the south-west and Coed y Geufron to the south-east.

The statutory designated sites closest to the site are Coed y Gopa Site of Special Scientific Interest (SSSI) and Traeth Pensarn SSSI, both approximately 1.5km away, and Liverpool Bay Special Protection Area (SPA), approximately 1.8km to the north. Coed y Gopa SSSI, to the west, is designated for its hibernating lesser horseshoe bats *Rhinolophus hipposideros*, and the site lies within the 2km core sustenance zone of this colony. Traeth Pensarn SSSI, to the north-west, is designated for its vegetated shingle, a habitat that is not present on or near the site. Liverpool Bay SPA is classified for red-throated diver *Gavia stellata*, common scoter *Melanitta nigra* and little gull *Hydrocoloeus minutus* in the non-breeding season, common tern *Sterna hirundo* and little tern *Sternula albifrons* in the breeding season, and its waterbird assemblage.

The PEA identified four non-statutory Sites of Importance for Nature Conservation within 500m of the original survey area: Pwll Tan-y-Bryn (a pond approximately 75m to the south, which appears to have been removed by nearby development), Abergele Grazing Marsh (approximately 150m to the north-east), Berthglyd Pond (approximately 250m to the north) and Ffordd Las (woodland approximately 475m to the south).

3.2 Summary of ecological surveys

The following ecological and arboricultural surveys have been undertaken to inform the proposals:

- A desk study and PEA survey, including a UK Habitat Classification survey, on 12th December 2025 (UES, 2026a).

- Five wintering bird surveys between November 2025 and March 2026 (UES, 2026b).

- A ground level tree assessment for bats on 22nd July 2026, with aerial tree assessments on 8th August, 24th August and 21st September 2026 (UES, 2026c).

- A BS5837:2012 tree survey on 12th and 16th October 2025 and an arboricultural impact assessment (mdlandscape, 2026).

3.2.1 Survey findings

The key findings relevant to the site are summarised below. Full details are provided in the survey reports.

- **Habitats** - The field is modified grassland of low botanical value. Hedgerow H5 is a species-rich native hedgerow with mature oaks and a ground flora including hart's-tongue fern *Asplenium scolopendrium* and soft shield-fern *Polystichum setiferum*. The other boundary hedgerows are native hedgerows, with H6 supporting wood avens *Geum urbanum* and stinking iris *Iris foetidissima*. The hedgerows may qualify as habitats of principal importance under Section 7 of the Environment (Wales) Act 2016. The PEA considers that the hedgerows other than H5 would not qualify as important under the Hedgerows Regulations 1997 for ecological reasons, but they may qualify on historical grounds.

- **Trees** - The boundary trees are a mix of oak, sycamore and ash, with some goat willow. Sessile oak *Quercus petraea* T689 on the southern boundary is a potential veteran tree, with a girth of 4.68m. A further sessile oak with early veteran characteristics (T693) stands close to the western boundary, beside the public footpath. No trees are subject to a Tree Preservation Order and the site is not within a conservation area.

- **Badgers** *Meles meles* - A large sett, considered likely to be, or to have been, a main sett, was recorded within one of the boundary hedgerows. Signs of badger activity, including paths, latrines and snuffle holes, were recorded across the survey area. The PEA concludes that if a 30m buffer is maintained around the sett, within which no heavy machinery or groundworks take place, and connectivity across the site is retained, the development may proceed without the need for sett closure. If works within the buffer prove necessary, a badger activity survey and a licence from Natural Resources Wales would be required. The location of the sett is sensitive information and is not described further in this statement.

- **Bats** - No bats or evidence of bats were recorded in any of the trees surveyed. The bat tree assessment covered the trees identified as potentially affected under the original, larger site layout. Of the current boundary trees, T689 was assessed as having a feature suitable for individual bats (PRF-I) following aerial inspection, and T711 was assessed as having no roosting potential. No tree removal or pruning is currently proposed, and any other tree requiring works will be assessed first (see Section 4.3). The boundary hedgerows and trees provide the main commuting and foraging habitat, while the grassland is of low value for bats. Given the site's position within the core sustenance zone of the Coed y Gopa lesser horseshoe bat colony, the retention of dark linear features is important.

- **Birds** - Thirty-six species were recorded during the wintering bird surveys across the wider survey area, including 19 species of conservation concern. Most activity was associated with the boundary hedgerows and trees. A single snipe *Gallinago gallinago*

was flushed from the field and a single lapwing *Vanellus vanellus* flew over the wider site. The site is not considered to be functionally linked to Liverpool Bay SPA or important for significant populations of any other wintering birds. The hedgerows, trees and scrub provide nesting habitat for breeding birds.

- **Amphibians and reptiles** - Great crested newts are considered absent from the site and its surroundings, but common amphibians may be present. Reptiles are considered highly unlikely to be present.

- **Hedgehog** *Erinaceus europaeus* - Hedgehogs are likely to use the site in a limited capacity.

- **Watercourse** - The small stream west of the site is shallow and fast flowing and is culverted at its northern end. It is unsuitable for otter *Lutra lutra* and water vole *Arvicola amphibius*. Three-cornered garlic *Allium triquetrum*, a non-native invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981, was recorded beside the stream and footpath outside the site.

3.3 Existing green infrastructure assets

The site's existing green infrastructure is concentrated around its edges. These assets form the baseline against which the proposals have been assessed.

Hedgerows and trees

The boundary hedgerows and their mature trees form an almost continuous network around most of the field and are the site's most valuable green infrastructure. They link to the hedgerow and treeline network to the south and south-east and to the grounds of the hotel to the east. They provide nesting and foraging habitat for birds, commuting and foraging routes for bats, and movement corridors and cover for badgers and hedgehogs. Sessile oak T689 is of particular value as a potential veteran tree.

Scrub

Small areas of mixed scrub next to the eastern boundary and in the south-western corner add structural diversity and provide shelter and nesting habitat.

Grassland

The modified grassland is of low botanical value. It provides open foraging habitat for species such as mistle thrush *Turdus viscivorus*, meadow pipit *Anthus pratensis*, corvids and gulls, and foraging for badgers, but similar habitat is widespread in the surrounding area.

Stream and public right of way

Immediately west of the site, the public footpath and the small stream alongside it form a linear corridor. The footpath links St George's Road to the south with Rhuddlan Road to the north, and the corridor contributes to local connectivity for wildlife.

4 STEP-WISE APPROACH

4.1 Avoid

The layout has been designed to retain the site's most valuable features. The arboricultural impact assessment confirms that no trees or hedgerows will be removed to facilitate the development. The only vegetation clearance required is of self-set silver birch saplings and scrub at the new entrance from St George's Road. Apart from this, built development is confined to the modified grassland, which is the habitat of lowest ecological value on the site. The layout does not, however, fully avoid the predicted root protection area (RPA) of potential veteran oak T689 (see Section 4.2).

The badger sett will be retained. [redacted] No dwellings, roads or drives lie within it, and no new drainage is shown within it on the current drawings. Any new service routes should avoid the zone, and any works to, or access along, the existing sewer easement within it should be agreed with the ecologist and covered by the Construction Environmental Management Plan (CEMP).

The stream and the public footpath lie outside the site, and the current drawings show no works to either. The layout shows a potential footpath link from the north-western corner of the site to the public footpath, and future potential link roads beyond the site boundary. Any footpath link would require a gap in the western boundary hedgerow. Its position should avoid the badger commuting route and mature trees, be agreed with the ecologist and arboriculturist, and be compensated by native hedgerow planting. The future link roads are outside the scope of this application and would require separate assessment.

4.2 Minimise

Tree and hedgerow protection

Retained trees and hedgerows will be protected throughout construction in accordance with the arboricultural method statement and BS5837:2012. Protective fencing and ground protection will create construction exclusion zones before any site works begin, and an arboricultural watching brief will be in place for any works within RPAs.

The current layout places plot 1, and to a lesser extent plot 2, within the predicted RPA of T689. The tree schedule in the arboricultural impact assessment recommends avoiding development within the RPA of this tree, which has a decay fungus bracket and a history of previous failures. The assessment calculates that the dwelling and external hard standing of plot 1 would affect 9.4% of the predicted RPA, or 11.9% with a 1.5 m buffer, without allowing for any regrading of site levels. In line with the arboricultural impact assessment, the actual extent of the tree's roots in relation to the building footprint, construction working area and proposed walls will be investigated by hand-dug trial trenches and/or air-spade. Depending on the results, mitigation may include root pruning where rooting is negligible and roots are less than 25mm in diameter, a root barrier at the face of permanent excavations and minor changes to the footprint of the building and walls. If site levels within the RPA remain similar to existing, the impact on roots can potentially be managed through the design of foundations, external hard surfacing and the routing of services, and any change to site levels within the RPA will be subject to a detailed assessment. All works within the RPA will be carried out under an arboricultural watching brief, and the crown condition and growth of the tree will be monitored annually.

The same approach will be applied to the attenuation basin near ash T906 (11.2% of the predicted RPA, or 19.2% with a 1.5m buffer) and the pumping station near sessile oak T953 (6.4%, or 12% with a 1.5m buffer). Adjustments to the basin footprint and the orientation of the pumping station will be considered where the investigations show significant rooting.

The arboricultural impact assessment recommends management pruning of the boundary hedgerows before construction, so that they are of a maintainable height for new homeowners. To limit the loss of habitat value, any reduction in height or width should be kept to the minimum needed and agreed with the ecologist. It should be carried out outside the bird nesting season (March to August inclusive), preferably in late winter, or immediately after a nesting bird check by a suitably qualified ecologist.

Badgers

The ecological protection zone should be fenced before construction begins, and no heavy machinery, mechanical groundworks, storage of materials or site compounds should be permitted within it. The pumping station and the roads and drives near the edge of the zone should be constructed using working methods set out in the CEMP, to ensure that works do not encroach into the zone.

Lighting

No lighting proposals are yet available. External lighting, during both construction and occupation, should be designed in line with the lighting guidance in the PEA and with Bat Conservation Trust and Institution of Lighting Professionals Guidance Note 08/23 *Bats and Artificial Lighting at Night*, to keep the boundary hedgerows, the stream and footpath corridor, the ecological protection zone and any installed bat boxes dark. This is particularly important given the site's location within the core sustenance zone of the Coed y Gopa lesser horseshoe bat colony, as this is a light sensitive species. In line with the PEA, measures should include low-UV light sources, hooded and directional luminaires that avoid light spill into hedgerows and trees, timers to provide dark periods for street lighting, and, for domestic and security lighting, movement sensors, lamps of no more than 2,000 lumens and no upward light spill.

4.3 Mitigate and restore

The following measures will be implemented to protect species that may be present during construction. They will be set out in a CEMP (Biodiversity), which can be secured by planning condition:

- **Badgers and hedgehogs** - Reasonable avoidance measures, including covering excavations overnight or providing a means of escape, capping pipes, securing chemicals, checking excavations before backfilling and removing potential refuges by hand.

- **Amphibians and reptiles** - Grassland will be cut short in advance of clearance, potential refuges will be removed by hand and any animals found will be moved to retained habitat. Works will stop and advice will be sought if a great crested newt is found.

- **Nesting birds** - Vegetation clearance and any tree or hedgerow works will be undertaken outside the bird nesting season (March to August inclusive), or immediately after a nesting bird check by a suitably qualified ecologist.

- **Bats** - No trees with bat roosting potential will be felled. If pruning of T689 is required, the affected feature will be inspected by a licensed bat ecologist immediately beforehand or removed using soft-felling techniques. If any feature with bat roosting potential is removed, compensatory bat boxes will be provided. Any other trees requiring work that have not already been assessed will be subject to a ground level tree assessment.

- **Watercourse** - Industry-standard pollution prevention measures will be used, and a 5m buffer will be maintained from the stream during construction where possible.

- **Invasive species** - As a precaution, it is recommended that soil and vegetation are not moved into or out of the area where three-cornered garlic is present beside the stream and footpath.

To maintain connectivity for wildlife once the development is occupied, the PEA recommends that fences installed on site are designed to allow the passage of both badgers and hedgehogs. The landscape drawings show timber garden fencing designed to allow hedgehogs to pass. Where garden or boundary fencing crosses a badger route, badger-sized gaps or badger gates should be provided. The PEA records a mammal track that crosses hedgerow H6 at the north-western corner of the site and runs along the inside of the northern boundary. A further track runs across the north-eastern part of the field and crosses hedgerow H3 on the eastern boundary, continuing south outside the site. These routes should be kept open, and the position of the pumping station compound and any garden fencing that crosses them should be agreed with the ecologist.

4.4 Compensate (on site)

Apart from a small area of scrub and self-set saplings at the site entrance, the only habitat that will be lost is modified grassland, which is of low ecological value. No trees will be lost, so the compensatory tree planting ratio in PPW paragraph 6.4.42 does not apply. Under PPW, on-site compensation forms part of step 3 of the step-wise approach. The loss of grassland will be compensated for on site through the creation of more diverse habitats, as shown on the landscape drawings:

- Approximately 1,300m² of wet meadow and 490m² of native marginal planting within the attenuation basin.

- Approximately 690m² of native scrub planting, mainly along the western boundary, comprising hawthorn *Crataegus monogyna*, goat willow *Salix caprea*, elder *Sambucus nigra*, hazel *Corylus avellana* and dog rose *Rosa canina*.

- Species-rich lawn across the main areas of public open space and approximately 170m² of pollen and nectar wildflower seeding.

- 62 new trees, 35 of which are native species or cultivars of species native to Britain, including field maple *Acer campestre*, hornbeam *Carpinus betulus*, crab apple *Malus sylvestris*, wild cherry *Prunus avium*, pedunculate oak *Quercus robur* and rowan *Sorbus aucuparia*.

The wintering bird survey concluded that the loss of the grassland is unlikely to significantly affect local bird populations, as similar and higher-quality habitat is available nearby. Off-site compensation (step 4) is not considered necessary.

4.5 Enhancement

The following enhancements are proposed in addition to the compensation measures above. Details not yet shown on the landscape drawings are to be confirmed in revised landscape drawings or in a detailed landscaping scheme secured by planning condition. All are to be secured through a Landscape and Ecological Management Plan (LEMP), to be provided at condition stage:

- **Ecological protection zone** - The area immediately around the badger sett, within the ecological protection zone, will be managed as a wildlife area rather than amenity grassland. This will comprise an unmown rough grassland margin with native thorny scrub planting, such as hawthorn, blackthorn *Prunus spinosa* and dog rose, compatible with the existing sewer easement. There will be no paths or seating in this part of the open space, and it is recommended that there is also no play equipment or lighting. Any planting should be by hand only, should not take place within 10m of a sett entrance unless agreed with the ecologist, and should be timed and supervised so that badgers are not disturbed. If any works are likely to disturb badgers occupying the sett, a licence from Natural Resources Wales will be required. The current landscape drawings show species-rich lawn in this area and will need to be updated, either before the planning application is submitted or through a detailed landscaping scheme secured by planning condition. The rest of the zone will remain as open space, and any ground preparation or planting within it will follow the measures in the CEMP.

- **Bird and bat features** - One bird or bat feature will be provided for every three new dwellings. These should include integrated swift or universal nest bricks and house sparrow terraces on the new dwellings, integrated bat boxes or tubes on dwellings facing the retained hedgerows, and bird and bat boxes on mature boundary trees. The mix and locations will be set out in the LEMP, with all features kept away from external lighting.

- **Native hedgerow planting** - The current planting plan uses ornamental species for all new hedges. In line with the recommendations of the wintering bird survey, it is recommended that native species-rich hedging with berry and nut-bearing species is used in place of ornamental species for new hedges next to public open space and site boundaries, where practicable.

- **Refuges** - It is recommended that log and brash piles are created within the scrub planting to provide shelter for amphibians, invertebrates and small mammals.

- **Native tree planting** - Of the 62 trees proposed, 35 are native species or cultivars of species native to Britain. In line with the PEA and wintering bird survey, it is recommended that the proportion of native trees is increased, particularly in the open space and next to boundary habitats.

5 INTEGRATION OF GREEN INFRASTRUCTURE

The scheme has been designed around the site's existing boundary features, with new multifunctional green infrastructure added to strengthen connectivity, manage surface water and provide accessible open space for new and existing residents.

Retained boundary framework

All boundary hedgerows and trees are retained. Along the northern boundary the hedgerow is set within public open space, which provides a buffer between the hedgerow and the new dwellings. Along the western boundary, the hedgerows are separated from the dwellings by the estate road, the attenuation basin, the LEAP and native scrub planting. Where hedgerows adjoin rear gardens, they should be kept outside private gardens where possible, or otherwise protected through the LEMP and maintenance arrangements, so that they are not removed or cut back piecemeal over time.

Public open space and the ecological protection zone

The site layout provides approximately 0.9 ha of public open space, mainly along the northern side of the site, with a smaller area in the south-west next to the LEAP. The open space will be sown with species-rich lawn and planted with trees, providing recreation and access to nature close to new homes. The area immediately around the badger sett, within the ecological protection zone, will be managed for wildlife as described in Section 4.5.

Sustainable drainage

The attenuation basin in the north-western part of the site will be planted with a wet meadow seed mix and native marginal species, including greater pond-sedge *Carex riparia*, marsh-marigold *Caltha palustris*, purple-loosestrife *Lythrum salicaria*, yellow iris *Iris pseudacorus* and water-plantain *Alisma plantago-aquatica*. This combines surface water management with new wet meadow and marginal habitat for invertebrates and birds, a habitat that is not currently present within the field. The marginal mix also includes great wood-rush *Luzula sylvatica*, a woodland species that makes up a quarter of the mix, and it is recommended that this is replaced with a native wetland species.

Street trees and planting

New tree planting along the estate roads and within the open space is expected to provide shade and habitat connectivity through the development.

Access and movement

No works to the public footpath to the west of the site are shown on the current drawings. The layout shows a potential footpath link to it from the north-western corner of the site, which would connect new residents to the wider countryside, subject to the measures in Section 4.1. The lighting measures in Section 4.2 are intended to keep the boundary hedgerows, the ecological protection zone and the stream corridor dark, allowing wildlife to continue to move around and through the site.

6 NET BENEFIT FOR BIODIVERSITY

PPW does not prescribe a biodiversity metric. This statement assesses net benefit against the DECCA attributes of ecosystem resilience. Table 1 summarises the site's baseline and the expected outcome of the development for each attribute.

Table 1 - Assessment of the proposals against the DECCA attributes

Attribute	Baseline	With the development
Diversity	Low. A single field of species-poor modified grassland, with diversity concentrated in the boundary hedgerows, trees and scrub.	Increased. All boundary hedgerows and trees retained, with new wet meadow, marginal, native scrub, species-rich lawn and wildflower habitats and a mix of tree species.
Extent	Most of the approximately 4.2ha site is modified grassland, largely enclosed by boundary hedgerows, trees and small areas of scrub.	Most of the modified grassland is lost to built development. No hedgerows or trees are lost (any future footpath link would need a gap in the western hedgerow, to be compensated by native hedgerow planting). Approximately 0.25ha of new wet meadow, marginal and native scrub habitats are created, with species-rich lawn across most of the open space.
Condition	Species-poor grassland with evidence of grazing. Hedgerows mature and managed. Potential veteran oak T689 with structural defects and a decay fungus, to be reinspected annually.	Retained and new habitats managed under a LEMP. Plot 1, and to a lesser extent plot 2, lie within the predicted RPA of T689; root investigation and protection measures as set out in the arboricultural impact assessment.
Connectivity	Boundary hedgerows connect to the footpath and stream corridor, the hedgerow network to the south and the hotel grounds. The A55 limits connectivity to the north-east.	Boundary network maintained, with an open space buffer to the north, dark corridors (subject to a sensitive lighting scheme), hedgehog-permeable fencing and recommended badger permeability.
Adaptability	Limited. A single land use with low structural and species diversity.	Improved. A wider range of wet and dry habitats, sustainable drainage and a more varied tree mix, with a recommended increase in native species.

The development will result in the loss of open grassland of low ecological value, while retaining the site's higher-value boundary habitats and creating a range of new habitats. Provided that the measures set out in Section 4 are implemented and secured through planning conditions, in particular the management of the ecological protection zone, the protection of T689, sensitive lighting and the bird and bat features, the scheme is capable of delivering a net benefit for biodiversity in accordance with PPW.

7 LONG-TERM MANAGEMENT AND STEWARDSHIP

Long-term management is needed to ensure that the green infrastructure establishes successfully and continues to deliver its benefits for the lifetime of the development. Management will be set out in a LEMP, which can be secured by planning condition. The LEMP will include:

- Objectives for each retained and created habitat, including the boundary hedgerows and trees, the ecological protection zone, the attenuation basin, the species-rich lawn, the wildflower planting and the native scrub.

- Management prescriptions, including cutting the boundary hedgerows on rotation outside the bird nesting season, keeping them as tall and wide as is compatible with the adjoining uses, and an appropriate cutting regime for each grassland and wetland habitat.

- Specific measures for the ecological protection zone, including its rough grassland and scrub management, the avoidance of disturbance to the sett, and checks for unauthorised access or dumping.

- The locations and maintenance of the bird and bat features, hedgehog gaps and refuges.

- The replacement of any failed planting during the establishment period.

- Good horticultural practice, including peat-free materials, avoiding pesticides where possible, and avoiding excessive pruning of trees, hedgerows and shrubs, as recommended in the PEA and wintering bird survey.

- Inspection of retained trees at least every two years, with annual inspection of T689, and measures to support the rooting environment of trees affected by construction, as recommended in the arboricultural impact assessment.

- A programme of monitoring, with adaptive management where objectives are not being met.

- Responsibilities for management, including the role of the management company, and reporting arrangements.

Construction-phase protection, including the fencing of the ecological protection zone, tree protection and the reasonable avoidance measures, will be set out in the CEMP (Biodiversity).

8 CONCLUSION

The proposals have been informed by a PEA, wintering bird surveys, bat tree assessments and an arboricultural impact assessment. The site's most valuable green infrastructure, its boundary hedgerows and mature trees, will be retained. Apart from a small area of scrub at the site entrance, development is confined to modified grassland of low ecological value.

The step-wise approach has been applied. The loss of boundary habitats and effects on the badger sett and the stream corridor have been avoided through the layout, although plot 1, and to a lesser extent plot 2, lie within the predicted RPA of T689 and any future footpath link would require a gap in the western hedgerow. Potential effects on retained trees, badgers, bats, birds and other species will be minimised and mitigated through tree protection, an ecological protection zone fenced during construction, sensitive lighting and reasonable avoidance measures. Effects on T689, a potential veteran oak, will be managed through root investigation and the protection measures set out in the arboricultural impact assessment.

The loss of grassland will be compensated for on site through new wetland, scrub, species-rich grassland and tree planting. Further enhancements, including the management of the area around the sett for wildlife and the bird and bat features, are to be secured through a LEMP, and native hedgerow and tree planting is recommended. With these measures in place, the development is capable of delivering a net benefit for biodiversity and a connected, multifunctional green infrastructure network that supports both wildlife and the new community.

9 REFERENCES

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