Green Infrastructure Statement



Site Address: Site off Ysguborwen Road, Dwygyfylchi for Cartrefi Conwy Housing

Proposal:

Description of Works:

Creation of several residential dwellings with associated infrastructure Construction of one and two storey residential housing units including access roads, parking areas, service provision, detached garages, and sustainable drainage features including swales and basin. Appropriate site clearance and

groundworks to accommodate construction.

- 1.1 fenton+reece ltd has been asked to prepare a Green Infrastructure Statement for the planning application for the proposed Cartrefi Conwy Housing residential development to the site off Ysguborwen Road, Dwygyfylchi. This document is to be read in conjunction with Detailed Planting and Biodiversity Plan (087-FRL-XX-ZZ-DR-L-1030).
- 1.2 Following recent updates to Planning Policy Wales 12 there is now a requirement for all planning applications in Wales to be supported by a Green Infrastructure Statement. Section 6.2.5 has been updated to include the following statement:

"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 6.4.21) has been applied."

1.3 Refer to Enfys Ecology Ltd (14.08.2025) for PEA titled *Preliminary Ecological Appraisal of Land off Ysgbuborwen Road, Dwgyfylchi on Behalf of Cartrefi Conwy* for full ecological information.

1.4 The table below has been drawn up using the Annex Document to the Updated National Planning Policy for Chapter 6 of Planning Policy Wales. A summary of the existing Green Infrastructure has been identified as the baseline condition and assessed against The DECCA Framework to establish any impact on the sites Green Infrastructure.

Landscape + Ecological Designations: (this statement does not replace an LVIA or Ecology Survey)						
Designations: either covering or within effective distance of the site	Location	Proximity to Site	Impact			
National Parks Snowdonia	South of site	500m	No impact on existing GI due to proximity and scale of proposal			
Historic Landscape Area (HLA) Penmon	Covers site	Covers site	Minimal impact on existing GI due to scale of proposal in a small parcel of designation			
Registered Landscapes of Outstanding & Special Interest North Arllechwedd	South West of site	500m	No impact on existing GI due to proximity and scale of proposal			
Special Protection Area (SPA) Bae Lerpwl/ Liverpool Bay	North West of site	345m	No impact on existing GI due to proximity and scale of proposal			
Special Area of Conservation (SAC) Y Fenai a Bae Conwy / Menai Strait and Conwy Bay	North West of site	345m	No impact on existing GI due to proximity and scale of proposal			

Existing Green Infrastructure Baseline + Condition:

Summary:

The site comprises of a north facing sloping coastal rough pasture parcel of land with scrub and trees along the western boundary, bordering agricultural fields to the west, a major road (A55) and railway line to the northern boundary, and semi-urban settlement (Dwygyflchi) to the east and south. The coastline is approximately 60m north of site.

- The existing GI on site has good local scale connectivity along the western boundary
- The site is considered to have generally low biodiversity value; habitats on site are common in the ecological region.
- There were no records or observations of of notable flora or invasive non-native species within the site or within 500m. There were no observations or signs of notable or protected species on site.
- No Bats were observed during the survey. The site is unlikely to be suitable for bat habitation but is highly suitable for bat foraging.
- It is recommended that a reptile survey is conducted.

Wider Connectivity:

The site lies within 500m of the Carneddau mountains and Eryri National Park comprising of heathland and rocky exposures. Hedgerows and gardens offer some habitat connectivity to nearby woodland and a watercourse, but this is constrained by the site's position between the coastline, major infrastructure, and residential areas of Dwygyfylchi.

Habitat Classifications:

The site is predominantly occupied by poor semi-improved grassland, with dense continuous scrub to the western boundary, at some points extending halfway into the site. A small patch of continuous bracken was identified in the centre of the site with another at the site entrance. Intact and defunct species poor hedgerows are present to the south eastern and south western corners. A shallow ditch is present along part of the western site boundary. While dense and established in parts, floral diversity and condition of habitats and ecotones are generally poor. Refer to Enfys Ecology (14.08.2025) for more information on habitat descriptions.

Fauna Considerations:

The site offers limited habitat for amphibians (including Great Crested Newts), badgers, bats, water vole, and otters. However, the whole site area is suitable for foraging of common amphibian species, badgers and bats.

Taller vegetation is considered suitable for nesting birds, areas of scrub provide potential habitat for dormice, although considered highly unlikely to be present on the site. The entire site is suitable for habitation and foraging use of hedgehogs and reptiles. It is therefore recommended that a reptile survey is conducted.

There were no reports or observations of species protected under UK BAP or notable species on site, and diversity is expected to be low on site. However, due to site's potential for hosting species foraging, clearance of the site will cause displacement and disturbance. Reasonable Avoidance Measures are advised.

Avoidance

Summary:

- No Habitats of Principle Importance for Wales will be impacted by the development
- If at any point a badger sett is discovered on or adjacent to the site, all works must immediately stop and an ecologist must be consulted for further advice
- If any deep cracks or holes are discovered in trees during site clearance works should stop until they can be checked by a suitably qualified ecologist.

Appropriate protection fencing should be used during construction to avoid damage to retained habitats.

As bat species are likely to use the site for flight paths to neighbouring grassland following the development, it is recommended that sensitive lighting is considered on site: retain dark corridors within the scheme where possible; lighting to the western boundary is minimised where feasible.

Refer to Lighting Professionals (2023) 'Bats and Artificial Lighting at Night'. and Appendix D, Enfys Ecology (205) 'Preliminary Ecological Appraisal of Land off Ysgbuborwen Road, Dwgyfylchi on Behalf of Cartrefi Conwy' for information on lighting design.

Mitigation

Refer to Detailed Planting and Biodiversity Plan (087-FRL-XX-ZZ-DR-L-1030) for more information.

Summary:

- Prior to works, a toolbox talk should be given to all involved in the project to set out ecological protection measures. A log of this should be kept.
- Working areas should be kept to minimum required
- Avoid works within 1 hour of dawn and dusk. If works are required outside of these hours, lighting should be directed away from boundary edges.
- Coastal habitat and marine sites could be affected by any run off. Steps must be taken to ensure there is no run off of sediments or pollutants from the site before, during and post construction.
- Excavations are to provided with a suitable ramp if left overnight to allow badgers and other animals to escape (plank, branch, or graded edges).
- Follow measures to protect species and habitat as listed below.

Planting:

It will not be possible to avoid the loss of scrub habitat due to extent and nature of proposals. Ecological design and planting on site will mitigate and improve the diversity to compensate for this loss.

Fauna and Habitat:

Mammals: Any terrestrial mammals seen must be allowed to leave the area on their own. If this is not possible e.g. the animal is injured or trapped then an ecologist must be called.

Amphibians and Reptiles: If at any point in the works an amphibian or reptile is found within the works area all works in the vicinity of the sighting must immediately cease. Common amphibians should be moved from the working area by site workers (wearing gloves) and placed in a nearby hedgerow. Reptiles will usually retreat to a safe area of their own accord. If, at any point, GCN are discovered during the works then works will have to stop and a licence may be required from NRW before they can continue.

Badgers: If at any point a badger sett is discovered on or adjacent to the site, which is unlikely, then a suitably qualified ecologist should be informed. No works should take place within 10m of a sett, and not within 30m if using machinery, unless under an appropriate licence.

Bats: If further mitigation measures are required to reduce the impacts of artificial lighting at night, it is recommended that a lighting professional assists in selection of lighting

Hedgehogs: Care must be taken regarding clearance of any piles of brushwood, rubble, plant material or other 'habitat piles' in the colder months due to the possibility of disturbing hibernating animals including hedgehogs. Such piles should not be disturbed between October and April or when daytime temperatures are below 10°C.

Nesting Birds: All vegetation clearance during the nesting season may impact nesting birds, and so further survey may be required in order to establish if nests are present. Therefore it is recommended that as far as possible all vegetation clearance takes place outside March - September inclusive. If this is not possible, all vegetation to be cleared MUST be thoroughly checked for nests, immediately prior to the works; if any active nests are present all works in the vicinity must cease until all chicks have fledged.

Trees being removed must be checked for any defects such as knotholes, cracks and lifted bark, as they may be used by roosting bats; any such features must be checked by a suitably licensed ecologist prior to felling. 6no. Trees are identified for removal on site, which must be mitigated at 3:1. The proposed scheme will plant 18 new trees.

Pollutants:

Spill kits should be readily available, and pollutants, fuel and, where possible, materials are to be restricted to hardstanding areas.

Enhancements

Refer to Detailed Planting and Biodiversity Plan (087-FRL-XX-ZZ-DR-L-1030) for more information.

Summary:

- The proposed works will have an overall net benefit to *diversity, condition, connectivity,* and *adaptation*.
- The proposed works will provide a net improvement to habitat on site.
- The habitat classifications *Species-poor semi-improved grassland* and *scrub* require compensation for the loss / damage during works.
- At least 10no. bird boxes are provided on site as per ecologist's recommendations.
- An additional 4no.swift boxes are to be erected on site.
- Bat box locations to be confirmed with ecologist.
- Invasive species are avoided

Habitat Compensations:

Grassland: The loss of this habitat will be offset by accommodating areas of appropriate species-rich costal grass seed mix to the northern area of site around the basin, areas across site, and species-rich coastal tussock grass seed mix to the southern edge of site to amenity grassland

Scrub: areas of multi-species native coastal shrub mix, and multi-species native coastal hedge planting and placed shrubs will compensate and enhance the condition of shrub on site.

Proposed Habitat and Planting:

Refer to Detailed Planting and Biodiversity Plan (087-FRL-XX-ZZ-DR-L-1030).

The planting design on site introduces biodiversity rich planting featuring plant species selected for pollinators, a wider diversity of trees including fruiting species to encourage birds and insects.

Swale areas and sustainable drainage basin introduced on site will accommodate nature-based solutions for water treatment on site and introduce further marginal and water body habitats on site.

A biodiverse wildlife corner is proposed to the southeastern corner of site providing structural complexity through pollinator friendly planting species, habitat logs, a hibernacula insect tower, rock features and shrubbery ecotones which give year round structure, shelter and foraging opportunities. Invasive planting species are avoided across all mixes.

Green roofs are specified to the tops of bin stores with a biodiverse wildflower mix, making use of small hard areas to valuable habitats providing foraging and nesting opportunities for pollinators, birds, and insects and enhance connectivity between green networks across the site and soften the visual impact.

Bird Boxes:

To compensate for the loss of features which could be used by nesting birds at least 10no. bird boxes are incorporated into the site's layout at suitable locations as per ecologists recommendations including:

- Woodstone Boxes with a 32mm entrance (sparrow boxes)
- Woodstone Boxes for smaller birds (25-28mm entrance)
- Woodstone Boxes with 45mm opening (starling box)

These boxes are to be installed 2-4m above ground facing north/north-east and facing areas of trees and other vegetation.

An additional 4no. swift boxes are located within the design in pairs on eastern or western elevations of proposed buildings, at least 5m above ground, and fastened securely. Product recommendation:

HabiSabi double swift box

Hedgehog Holes:

13 x 13cm square holes are to be incorporated into the bottom of every fence or gravel board to allow commuting and foraging of hedgehogs, while restricting pet access.

Bat Boxes:

Bat boxes are specified to be built into new houses alongside potential commuting and foraging routes along the northern, western and eastern boundaries. Bat boxes are positioned facing south, at least 3m above the ground, away from windows and lighting. The location of these is to be confirmed with an ecologist.

Hibernacula and Habitat towers:

The landscape offers 2no. hibernacula for amphibians and reptiles to the northern basin and 1no. Hibernacula Habitat Towers by The Urban Greening Company to the southern wildlife corner

The DECCA Framework: establishes any impact [beneficial or adverse] on the sites Green Infrastructure.	Step-Wise Approach			
	Avoid	Minimise	Mitigate	Compensate
Diversity: Individual development proposals should avoid negative impacts on biodiversity, by considering how biodiversity assets, can be maintained and enhanced.	No adverse impact. Overall improvement through scheme	Precautions must be taken to minimise impact to existing fauna		
Extent: Individual development proposals must avoid loss in the extent of biodiversity and incorporate measures to appropriately maintain and enlarge existing habitats, especially where extent is small or declining, through habitat restoration and creation with adjoining and nearby areas, green infrastructure features and networks	Mandana		Removed trees will be replaced at a ratio of 3:1. Grass seeding will mitigate loss of grassland	
Condition: Individual development proposals must not compromise the condition of ecosystems. consideration to both direct, indirect, and cumulative impacts and benefits. securing the long-term management of retained habitats is key to maintaining condition	No adverse impact. Overall improvement through scheme			
Connectivity: Individual development proposals should identify and incorporate measures which enable appropriate links to be made between the site and its surroundings so as to improve connectivity	Minimal adverse impact on connectivity through new planted boundaries and connected GI	Minimise impact of artificial lighting	Boundary hedgerows will mitigate loss of scrub and will enhance ecological corridors	
Adaptation: Individual development proposals should identify impacts to the ecosystem resilience attributes of biodiversity	SuDS features will offer an improvement to ecosystem resilience		New habitat features and enhancements	

Summary:

Existing Condition

- The site supports low diversity Green Infrastructure, predominantly including poor semi-improved grassland, scrub, 60m from the coastline.
- The site provides fragmented connectivity to coastline and uplands.
- The site provides suitable foraging grounds for bats, nesting birds, hedgehogs and reptiles.
- No notable, protected, or invasive species are reported.

Avoidance & Mitigation

- No Habitats of Principle Importance affected.
- Reptile survey recommended
- Ecologist consultation required if badgers, roosting bats, or nesting birds discovered.
- Protection fencing, sensitive lighting, restricted working hours, runoff management, and escape ramps for excavations recommended.
- Toolbox talks, controlled working areas, and pollutant safeguards required.
- Loss of scrub unavoidable → compensated via ecological design and planting.
- Four trees to be removed → replaced at 3:1 ratio (23 new trees).
- Reasonable Avoidance Measures are recommended
- Reduction of Artificial Lighting at Night is recommended

Enhancements

- Net gain in biodiversity, connectivity, and habitat condition.
- Habitat creation/compensation: species-rich coastal grassland, coastal shrub/hedge mixes, swales, and SuDS basin.
- Biodiversity-focused planting with pollinator and fruiting species.
- Wildlife features:
 - o 10 bird boxes + 4 swift boxes.
 - Hedgehog highways (13x13cm fence gaps).
 - o Integrated bat boxes along commuting routes. Locations to be confirmed with ecologists
- Invasive species excluded from planting.

The aim of the development on site will provide overall net benefit to biodiversity and green infrastructure. The implementation of mitigation strategies as above during works aims to reduce disturbance during the temporary state of the site.

Appendix

The following designations have been reviewed against the development; the mapping datasets were accessed using DataMapWales. If there is a designation present, either within the site boundaries or within effective distance of the development, these will be noted in the statement above.

	Within Site?	Within 500m?
Ancient Woodland (Ancient Semi Natural Woodland)	No	No
Ancient Woodland (Restored Ancient Woodland)	No	No
Area of Outstanding Natural Beauty (AONB)	No	No
Historic Landscape Areas (HLA)	Yes	No
Local Nature Reserves (LNR)	No	No
Marine Conservation Zones	No	No
National Nature Reserves (NNR)	No	No
National Parks	No	Yes
Orchards (Historic & Traditional)	No	No
Regionally Important Geodiversity Sites (RIGS)	No	No
Registered Historic Parks & Gardens (RHPG)	No	No
Registered Landscapes of Outstanding & Special Interest	No	Yes
Sites of Special Scientific Interest (SSSI)	No	No
Special Protection Areas (SPA)	No	Yes
Special Areas of Conservation (SAC)	No	Yes
Special Landscape Area	No	No

