



Bodnant Avenue, Prestatyn, Denbighshire

Green Infrastructure Statement (GIInfS) – March 2026

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Foreword

The concept of green infrastructure is considered by some to originate in American late 19th-century urban planning and landscape architecture and leader of the urban park's movement Frederick Law Olmsted. Under the concept of "greenways", the idea was to use tree-lined pleasure drives and linear parks to knit together the region's best landscape features into a network accessible to all. Unlike the squares, plazas, royal grounds, and gated parks of Europe, this greenway network was a distinctly democratic and American invention. It was intended to connect people together from all walks of life and all parts of the city in a shared experience of the outdoors.

The specific term "green infrastructure" emerged later in the early 1990s in the United States, particularly with the "Florida Greenways Project", a 110-mile linear park in Central Florida in 1991 and the Florida Ecological Greenways Network (FEGN), a system of native landscapes and ecosystems that sustains natural resources and beauty and an attractive living environment.

The New Towns movement, influenced by Ebenezer Howard's Garden City Movement, further embraced the concept of green infrastructure and integrated land use. The New Towns of Oakwood and Birchwood in Warrington were developed in the 1970's and 80's by the Warrington New Town Development Corporation and showcased the concept of green infrastructure as we know it today. The new towns were developed on brownfield land and aimed to integrate new residential areas with interconnecting parks and greenspaces and nature.

In the UK, the post war New Towns Act 1946 and in 1970 the book "New Lives, New Landscapes" by Nan Fairbrother, an English writer and lecturer and member of the Institute of Landscape Architects advocated an approach that could be considered to mirror that concept of greenways by the creation of landscapes that connected people and communities with nature, albeit on a much smaller scale than the greenways projects in the United States.

The benefits of connecting people and communities with nature have become increasingly recognised as bringing benefits to human health and well-being and this has been subsequently transposed into national and local planning policies and other related initiatives. The concept of green infrastructure as a tool for delivery of these benefits, has evolved from the larger macro scale concepts of greenways to a smaller micro level of individual sites and projects and a requirement of national and local planning policy. As public bodies, local authorities are required under Section 6 of the Environment (Wales) Act

"to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions".

Welsh Government through national Planning Policy Wales (PPW 12) requires all planning Authorities in Wales to adopt a strategic and proactive approach to green infrastructure and produce a Green Infrastructure Assessment (GIA) which brings together a GI evidence base in their area. GIAs should facilitate the strategic planning of the GI network in local areas and across Wales. On a local level, green infrastructure statements are a requirement for all planning applications recognising that they need to be proportionate to the scale and nature of the development, and how green infrastructure has been incorporated into the proposal.



Emerald Necklace Park system – a chain of parks and waterways in Boston Park designed by landscape architect Frederick Law Olmsted (1822-1903) between 1878 and 1896

1 Introduction

1.1 Green Infrastructure Statement

1.1.1 This Green Infrastructure Statement (GIInFS) has been prepared by Richards Moorehead and Laing Ltd (RML) on behalf of Adra (Tai) Cyfyngedig to support a planning application for a proposed residential development of affordable homes on the northeastern fringe of Prestatyn, Denbighshire, North Wales.

1.1.2 The GIInFS has been prepared in accordance with the requirements of Planning Policy Wales (PPW – Edition 12 – February 2024) set out in Chapter 6 Distinctive and Natural Places that covers environmental and cultural components of placemaking. Places that are distinctive and natural are seen as contributing to seven goals of the Well-being of Future Generations (Wales) Act 2015.

1.2 The Site and Study Area

1.2.1 The proposed development lies on the northeast fringe of the town of Prestatyn, Denbighshire. It is a greenfield site of 2.5 hectares currently used as agricultural land. The site composed of one field with featuring a Public Right of Way (PRoW) that traverses the site from north to south. To the north lies Prestatyn Motte and Bailey a Scheduled Ancient Monument (SAM), an amenity playground for children further to the north is the former Pontins site, Prestatyn Golf Club then the coastal dunes and beach. To the south and west is the town of Prestatyn. Along the southern boundary of the site and Nant Hall Road is a line of matures trees which are protected under a Tree Preservation Order (TPO). To the west is Bodnant Community School and to the east is Nant Mill Touring Caravan Site. Part of the northern boundary is the A548 Road, Pensarn to Deeside coastal road.

1.3 The Proposed Development

1.3.1 The proposed development is for a total of 62 dwellings with associated drainage and infrastructure including an access road off Bodnant Avenue Road. The existing treeline to the south of the site would be retained and protected as well as the hedgerows around the site boundary.

1.3.2 The dwellings would be a combination of apartments, semi-detached and detached buildings with designated car parking areas. Public open space is located towards the northern end of the site and an active travel route provided that connects the site to Bodnant Avenue to the west.

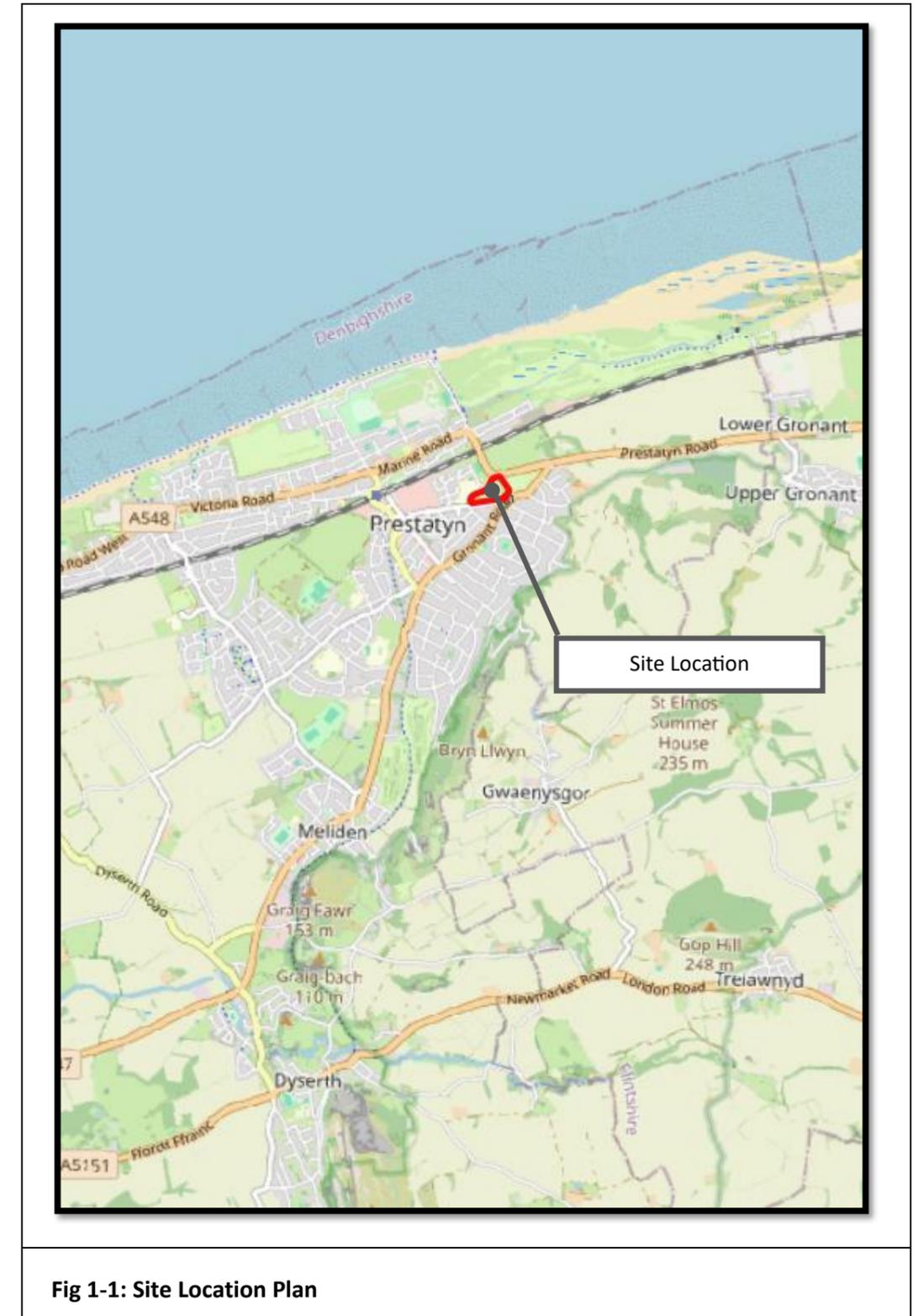


Fig 1-1: Site Location Plan

1.4 Definitions of Green Infrastructure

Planning Policy Wales (Edition 12 – February 2024)

1.4.1 PPW12 defines green infrastructure as: -

“the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places” and “at the landscape scale green infrastructure can comprise entire ecosystems such as wetlands, waterways, peatlands and mountain ranges or be connected networks of mosaic habitats, including grasslands”.¹

1.4.2 PPW12 also refers to the Environment (Wales) Act 2016 and how the Act provides a context for the delivery of multi-functional green infrastructure that can make a significant contribution to the sustainable management of natural resources by protecting, maintaining and enhancing biodiversity and promoting the resilience of ***ecosystems***.

1.4.3 GlnfS’s should be submitted with all planning applications and be proportionate to the scale and nature of the proposed development and describe how green infrastructure has been incorporated into the scheme.

Landscape Institute

1.4.4 With the origins of green infrastructure arguably lying in the professional roots of landscape architecture, the Landscape Institute is arguably best placed to define green infrastructure as: -

“the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect villages, towns and cities. It is a natural, service-providing infrastructure that is often more cost-effective, more resilient and more capable of meeting social, environmental and economic objectives than ‘grey’ infrastructure”.

Chartered Institute of Ecology and Environmental Management (CIEEM)

1.4.5 CIEEM does not provide a standalone definition of green infrastructure, but their publications, such as the 2013 briefing on green infrastructure, refer to it as a strategic network of natural and semi-natural areas, including green and blue spaces, designed to deliver ecosystem services, enhance biodiversity, and provide a range of environmental, economic, and health benefits.

The Town and Country Planning Association (TCPA)

1.4.6 TCPA define green infrastructure as a network of multi-functional green space and other green features, urban and rural, which can deliver quality of life and environmental benefits for communities.

1.4.7 Green infrastructure is not simply an alternative description for conventional open space. It includes parks, open spaces, playing fields, woodlands and street trees, allotments, private gardens, green roofs and walls, sustainable drainage systems (SuDS) and soils. It includes rivers, streams, canals and other water bodies, sometimes called ‘blue infrastructure’.

1.5 Components of Green Infrastructure

1.5.1 Green infrastructure can apply to large regional scale strategies through to small domestic scale projects. Examples of green infrastructure include, but is not limited to, the following natural, semi natural and man-made features: -

- Open Countryside and Areas of Outstanding Natural Beauty (AONB’s)
- Country Parks and Local Nature Reserves
- Coastal Habitat
- Rivers, Waterways, Lakes and Ponds
- Allotments and Community Gardens
- Village Greens Cemeteries, churchyards and burial grounds
- Footpaths, cycleways and multi-use paths
- Fields and Hedgerows
- Woodland
- Street Trees
- Outdoor Sports Facilities and Playing Fields
- Parkland and Orchards
- Private Gardens

1.6 Aims of the Green Infrastructure Statement

1.6.1 The aim of this GlnfS is to demonstrate that a stepwise approach has been followed to maintain and enhance biodiversity, build resilient ecological networks, and deliver net benefits for biodiversity. This is undertaken by ensuring that adverse environmental impacts are firstly avoided, then minimised, mitigated, and as a last resort compensated for.

¹ PPW 12 – para 6.2.1

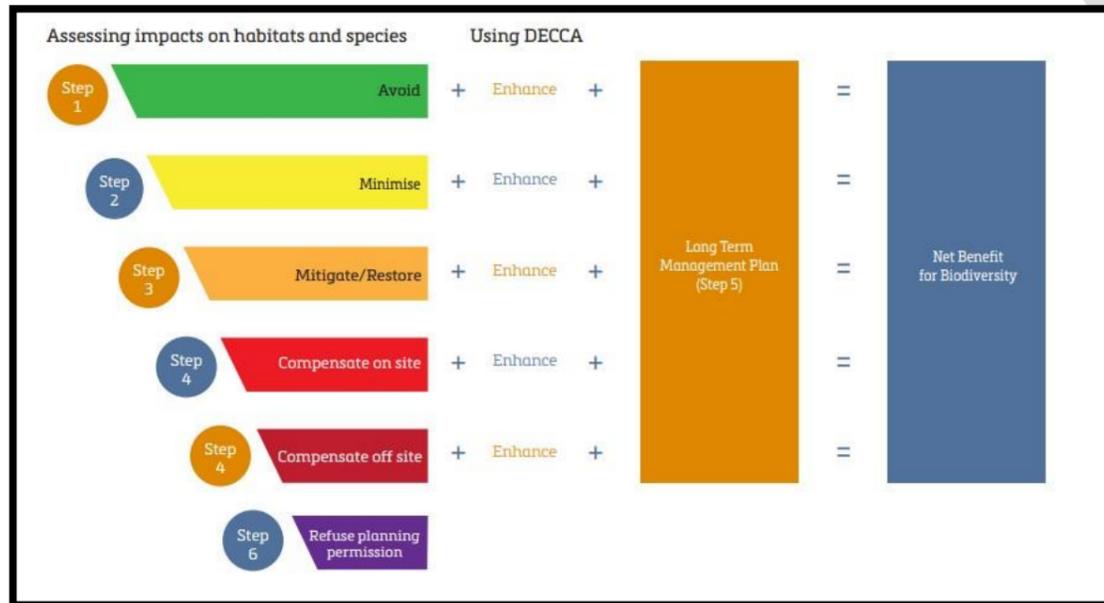
2 Planning Policies

2.1 Planning Policy Wales (PPW) and The Stepwise Approach

2.1.1 A Green Infrastructure Statement (GInFS) is an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and should be used for demonstrating how the ‘Step-Wise Approach’ (PPW Paragraph 6.4.21) has been applied. PPW states that the first priorities for planning authorities to consider, is if the proposed development avoids damage to biodiversity (in its widest sense). If there are any potential harmful environmental effects, then planning authorities must be satisfied that all reasonable alternatives have been considered. Sites that contain protected species and habitats which are irreplaceable should be safeguarded.

PPW acknowledges that the character and special qualities of all places and landscapes can provide a strong sense of place, inspiration and belonging, and can contribute to the distinctive cultural identity of Wales. It places emphasis on the characteristics of both nationally protected areas such as National Parks and local landscapes, and areas of high landscape importance that may be unique or distinctive to a particular area.

Figure 2-1: Summary of the Step-Wise Approach



2.2 The Well-being of Future Generations (Wales) Act 2015

2.2.1 The Well-being of Future Generations (Wales) Act 2015² includes seven well-being goals the second of which is ‘A resilient Wales’, described as:

‘A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).’



Table 2-1: The Seven Goals of the Well-being of Future Generations (Wales) Act 2015

The Seven Goals	How to contribute to the seven well-being goals
A Prosperous Wales	By valuing the quality of our landscapes and by protecting, maintaining and enhancing biodiversity and our natural environment and promote low carbon and appropriate resource choices which address the causes of climate change and can provide cost effective ecosystems.
A Resilient Wales	Supported by protecting and providing sufficient scale, extent, diversity and connectivity to maintain and enhance biodiversity and the resilience of ecosystems.
A Healthier Wales	By enabling opportunities for connecting with the natural and historic environment, tackling airborne pollution and other environmental risks and encouragement of improving physical and mental well-being.
A More Equal Wales	A society that enables people to fulfil their potential no matter what their background or circumstances and by promoting access to the natural and historic environment
A Wales of Cohesive Communities	By providing spaces for people to interact and to connect with nature and by mitigating risks such as pollution or flooding, and by maximising opportunities for communities to flourish in healthy, attractive and pleasant surroundings.
A Vibrant Culture and Thriving Welsh Language	By building on those unique and special characteristics which give places their distinct ‘feel’, identity and a sense of place through the protection and enhancement of the natural, historic and built environment.
A Globally Responsible Wales	By reducing carbon emissions, addressing airborne pollution and managing environmental risks and promoting a natural and historic environment which should be protected and enhanced for its special characteristics and nature conservation.

² Well-being of Future Generations (Wales) Act 2015 <https://www.gov.wales/well-being-of-future-generations-wales>

2.3 The Environment (Wales) Act 2016

2.3.1 Section 6 (S6) under Part 1 of the Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (the S6 duty) for public authorities in the exercise of functions in relation to Wales. Under section 6 of the Act, public authorities that exercise their functions in relation to Wales have a duty to maintain and enhance biodiversity and promote the resilience of ecosystems.

2.3.2 The S6 duty states that: -

“A public authority must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions.”

2.3.3 Section 6 of the Act also sets out the requirements for a public authority to take account of the resilience of ecosystems and particularly the following five key aspects.

- (a) diversity between and within ecosystems;
- (b) the connections between and within ecosystems;
- (c) the scale of ecosystems;
- (d) the condition of ecosystems (including their structure and functioning);
- (e) the adaptability of ecosystems.

2.3.4 These have been incorporated into Planning Policy Wales (12th Edition) where they are presented as the DECCA principles along with the stepwise approach.

Table 2-2: The five principals of DECCA

D	Diversity: to ensure mechanisms are in place to minimise further loss and where circumstances allow for species’ populations to expand and recolonise their natural range (former range) or adapt to future change. More diverse ecosystems are more resilient to external influences (this includes biological, geological and physical diversity on a site). This means development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity;
E	Extent: to ensure mechanisms allow for the identification of potential habitat, the maintenance of existing assets and networks and promote the restoration of damaged, modified or potential habitat and the creation of new habitat. This means that planning decisions should incorporate measures which seek the creation, restoration and appropriate management of green networks and linkages between habitats and maintaining and enhancing other green infrastructure features and networks;
C	Condition: Ecosystems need to be in a healthy condition to function effectively, to deliver a range of important ecosystem services. Planning decisions should not compromise the condition of ecosystems. By taking an integrated approach to development, for example, which considers both direct and wider impacts and benefits it should be possible to make a positive contribution. Planning for the long-term management of retained habitats is key to maintaining condition through for example, the use of planning obligations;
C	Connectivity: to take opportunities to develop functional habitat and ecological networks within and between ecosystems and across landscapes, building on existing connectivity and quality and encouraging habitat creation, restoration and appropriate management. The opportunities could include enlarging habitat areas, developing buffers around designated sites or other biodiversity assets or corridors, including transport and river corridors, and the creation of ‘stepping stones’ which will strengthen the ability of habitats and ecological networks to adapt to change, including climate change; and
A	Adaptability to change: primarily in the form of climate change, for both species (diversity) and ecosystems requires action to protect the extent, condition and connectivity of habitats, features and ecological networks. Development plans, planning proposals and applications which build on protecting designated sites and securing and enhancing green infrastructure will be key ways of addressing the attributes of ecosystems resilience identified in the Environment (Wales) Act as well as facilitating social and economic resilience aspirations of the Well-being of Future Generations Act.

2.4 Future Wales – The National Plan 2040

- 2.4.1 Future Wales: The National Plan 2040³ provides a framework that sets the direction for development in Wales to 2040. The plan is concerned with infrastructure and development in Wales and aims to ensure that the planning system is consistent at all levels. The National Plan introduced specific policies that safeguard areas for the purposes of improving the resilience of ecological networks and ecosystems services, to identify areas for the provision of green infrastructure, and to secure biodiversity enhancement, the plan introduced a requirement for development to deliver a net benefit for biodiversity (NBB).
- 2.4.2 Future Wales has eight outcomes; all aid in achieving the overall ambitions found within Future Wales. The plan aims to build resilient ecosystems and halt biodiversity decline as well as to provide a framework to support public transport development and usage across Wales over the next two decades, as part of a broader strategy to create a more sustainable and accessible transportation system.

2.5 Placemaking Wales Charter

- 2.5.1 The Placemaking Wales Charter⁴ has been developed in collaboration with the Placemaking Wales Partnership. The charter builds on the strengthening focus on placemaking policy and practice in Wales and aims to provide a common understanding of the range of considerations that go into placemaking.
- 2.5.2 “Placemaking” is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well-being in the widest sense and supporting the development of high-quality places across Wales for the benefit of communities.
- 2.5.3 RML are proud to be a signatory and advocate of the six principles of the Placemaking Wales Charter. It will be our aim to embody these principles during the design development process along with the Stepwise approach.

2.6 Denbighshire Local Development Plan (2006 – 2021)

- 2.6.1 The Denbighshire Local Development Plan (LDP)⁵ was formally adopted in June 2013. In conjunction with Future Wales – The National Plan 2040, it serves as the statutory framework for guiding planning decisions within the County until a replacement plan is formally adopted. Under the Planning and Compulsory Purchase Act 2004, the Council is required to maintain an LDP that acts as a single, cohesive framework for the control of development and land use. The document outlines the key challenges facing Denbighshire, establishing Vision, Objectives, and a Spatial Strategy for the region. While the 2013 LDP does not contain explicit requirements for Green Infrastructure Statements, it features several policies related to environmental protection and resource management, including requirements for Sustainable Drainage Systems (SuDS).

2.7 The Denbighshire Replacement Local Development Plan (2018 – 2033)

- 2.7.1 The Denbighshire Replacement Local Development Plan (2018 – 2033)⁶ is currently under preparation by the Local Planning Authority to manage growth and development through to 2033. This review process involves an assessment of the previous plan's performance, the formulation of new strategic objectives, and the identification of fresh land use allocations to meet modern housing and employment needs. The plan is currently moving toward to the Deposit Plan stage, following the consultation on the Preferred Strategy. Once adopted, this replacement LDP will provide a modernized policy framework that more closely aligns with the "Net Benefit for Biodiversity" requirements of Planning Policy Wales (PPW) and the formalization of Green Infrastructure assessments.

³ Available at [Future Wales: The National Plan 2040](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/714447/future-wales-the-national-plan-2040.pdf).

⁴ <https://dcfw.org/placemaking/placemaking-charter/>

⁵ Denbighshire County Council (2013). Denbighshire Local Development Plan 2006 - 2021. Adopted 4th June 2013.

⁶ Denbighshire County Council (2024). Replacement Local Development Plan 2018 - 2033. [Online]. Available at: <https://www.google.com/search?q=https://www.denbighshire.gov.uk/en/planning-and-building-control/local-development-plan/replacement-ldp/replacement-ldp.aspx>

2.8 Conservation Area

2.8.1 Conservation Areas are "areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance". They were introduced in 1967 under Civic Amenities Act (repealed by the Planning (Listed Buildings and Conservation Areas) Act 1990). It is an area-based designation by local planning authorities for preserving and enhancing the special character and appearance of towns, villages and areas. There are 33 conservation areas in Denbighshire.

2.8.2 The site lies within the Prestatyn Castle and Nant Hill Conservation Area⁷ Prestatyn Castle Mound (located off A548 Road) and the surrounding Nant Hall area constitute a key historical site in Denbighshire, North Wales. The site features a mid-12th-century Norman motte and bailey fortress, built by Robert de Banastre around 1164 and later destroyed by Owain Gwynedd in 1167, serving as a reminder of the area's medieval history.

- **Location:** The site is in Prestatyn town centre, with the castle remains visible from a public footpath just off Prestatyn Road.
- **Features:** The area includes a low-lying circular ditched motte and a rectangular bailey, with remnants of a substantial stone curtain wall.
- **Significance:** It is part of the broader, historically important, and often designated, landscape of Denbighshire.
- **Context:** While the castle is a distinct monument, the nearby, area, including Nant Hall road, is subject to planning guidance to protect its special character, including the potential for significant archaeological deposits, as noted in [Denbighshire County Council's site development briefs](#).

2.9 LANDMAP and Landscape Character

2.9.1 LANDMAP is an all-Wales resource that is administered by Natural Resources Wales. It records and evaluates landscape characteristics, qualities and influences on the landscape in a nationally consistent data set. The site lies within LANDMAP aspect area DNBGHVS003 Costal Farmland Gronant that has a summary description of the area as extracted below: -

"Flat land with open uniform character. Forms part of the continuous costal levels which forms a narrow linear strip of coastal and estuarine levels with a diverse mixture of arable and livestock (dairy) farmland drained by ditches. Contains occasional areas of wetland and abuts settlement edges. Very open and exposed field pattern, regular and defined by ditches with occasional gappy hedge line".

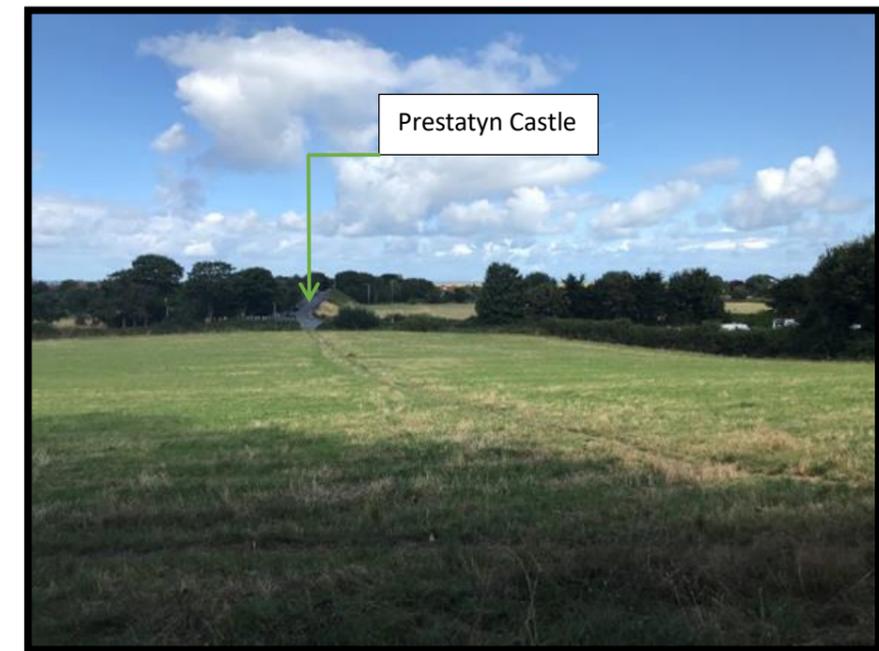
⁷ <https://www.denbighshire.gov.uk/en/documents/planning-and-building-regulations/ldp/supplementary-planning-guidance/adopted-spg-documents/conservation-areas.pdf>

2.10 Denbighshire Green Infrastructure Assessment

2.10.1 The Welsh Government has asked all planning authorities in Wales to undertake Green Infrastructure Assessments (GIAs). Planning Policy Wales requires planning authorities to produce up to date inventories and maps of existing green infrastructure and ecological assets and networks.

2.10.2 As part of the Replacement Local Development Plan 2018-2033, Denbighshire County Council (DCC) has prepared a Green Infrastructure Assessment (GIA) as part of its evidence base. This assessment identifies opportunities for improving green and blue infrastructure by expanding the network to provide a greener, healthier, more diverse, and prosperous Denbighshire by integrating green infrastructure in new development. The assessment recommends a vision for Denbighshire's green infrastructure: -

'By 2033, Denbighshire will be an even greener and more prosperous place to live, work, visit and invest. Green infrastructure will deliver benefits to health and well-being, support sustainable growth of the economy, underpin the county's response to climate change and provide connected and resilient ecological networks.'



Photograph 2-1 - View north across the site towards Prestatyn Castle.

2.10.3 The Denbighshire Green Infrastructure Assessment (GIA)⁸ identifies several overarching priorities designed to integrate natural assets into the planning and development process. The Assessment moves beyond simple conservation, framing GI as a critical "life-support system" for the county. Key priorities identified are provided in Table 2.3 below:

Table 2.3: GIA key priorities

1 Enhancing Ecological Connectivity	A primary priority is the creation of "Ecological Networks" that link fragmented habitats. This aims to facilitate species movement in response to climate change, particularly focusing on the Clwydian Range and Dee Valley AONB and the coastal corridors.
2 Climate Change Resilience and Adaptation	The GIA prioritises the use of GI for nature-based solutions, specifically the implementation of Sustainable Drainage Systems (SuDS) to manage increased flood risks in the Vale of Clwyd and coastal settlements like Rhyl and Prestatyn.
3 Health and Well-being Access	A strategic goal is ensuring that all residents have high-quality green space within a short walking distance of their homes. This includes the improvement of "Active Travel" routes (walking and cycling paths) that double as biodiversity corridors.
4 Urban Greening	For key settlements, the assessment prioritises the integration of street trees, green roofs, and urban pocket parks to mitigate the "urban heat island" effect and improve local air quality.
5 Net Benefit for Biodiversity	In line with national policy, the GIA establishes the priority that all new developments should not only protect existing features but provide a demonstrable "net benefit" to the local ecosystem through the enhancement of the GI network

2.10.4 The Denbighshire Green Infrastructure Assessment (2020)⁹ provides localized analysis for Prestatyn, emphasizing its unique position between the coast and the Clwydian Range. The key messages for this area include: -

- a) **Coastal Protection and Resilience:** Prestatyn is identified as a priority area for coastal GI. The assessment highlights the importance of maintaining and enhancing the sand dune systems and coastal grasslands (including Barkby Beach area) as natural sea defences and critical biodiversity hotspots:-
- b) **The Prestatyn Gutter and Waterways:** A major focus is placed on the Prestatyn Gutter. The key message is to improve the ecological quality and corridor function of this watercourse. It is viewed as a vital link for wildlife movement and a key component of the local Sustainable Drainage System (SuDS) to alleviate surface water flooding in the town: -
- c) **Tourism and GI Integration:** The assessment notes that Prestatyn's economy is heavily tied to its natural environment. A key message is the "dual-benefit" approach: developing GI that supports high-quality tourism (e.g., the North Wales Path and Offa's Dyke Path) while simultaneously protecting the sensitive habitats these trails pass through: -
- d) **Connectivity to the Hinterland:** There is a specific priority to improve green links between the residential areas of Prestatyn and the limestone hills of the AONB (Clwydian Range) to the south. This aims to reduce the "severance" caused by major roads and provide residents with better access to semi-natural greenspace: -
- e) **Enhancing Urban Greenery:** In the town centre and surrounding residential estates, the assessment calls for increased tree planting and the enhancement of existing small open spaces to improve the "stepped" connectivity for birds and pollinators moving through the urban fabric: -

⁸ Denbighshire County Council (2020). Denbighshire Green Infrastructure Assessment. Prepared in support of the Replacement Local Development Plan

⁹ Denbighshire County Council (2020). Denbighshire Green Infrastructure Assessment. Settlement Analysis: Prestatyn

3 The Proposed Development

3.1 Generally

3.1.1 Adra (the Applicant) is a North Wales’ housing association providing quality, energy efficient homes in North Wales. The development proposals for the site at Bodnant Avenue is for 62 No. affordable homes comprising of six different house types as set out in the table below:

Table 3-1: Proposed housing types

House Type	Description	House Type	Number of dwelling units
A	2 person/1 bedroom apartment	Apartments	14
B	3 person/2-bedroom dwelling	Bungalow	8
C	4 person/2-bedroom dwelling	Semi-detached House	19
D	5 person/3-bedroom house	Semi-Detached House	9
E	5 person/3 corner house	Corner House	10
F	7 person/4-bedroom dwelling	Terraced House	2
Total Dwellings			62

3.1.2 The development of the layout was architect lead and driven by factors such as viability, density and housing need in the local area to deliver affordable quality homes on the eastern fringe of Prestatyn with good connectivity to the town centre and associated amenities and transport connections.



Figure 3-1: 3D Aerial View of Proposed Development (refer to AGA Design Access Statement)

3.1.3 Each dwelling is designed to meet the requirements of the Welsh Government Housing Quality Standard 2023, Welsh Development Quality Requirements 2021 and follow Lifetime Homes guidance.

3.1.4 The proposed development is predominantly two storeys with a small number of bungalows to vary height and scale, grouped together in smaller clusters with positive frontage to reinforce natural surveillance. Staggered elevations and roof lines are designed to create interest, identity and architectural variety.

3.1.5 A new access road will be created off Bodnant Avenue. This will act as the main pedestrian and vehicular access and is intended to be adopted by the local highway authority. The existing public footpath crossing the site will be retained, and new pedestrian access points will be added, including the ‘woodland walk’ along the southern boundary.

3.1.6 The housing layout mainly comprises family houses in pairs, linked terraces, and larger detached plots all designed to mirror the scale and rhythm of neighbouring dwellings. Small scale groupings of walk-up cottage style apartments are interspersed to provide homes for couples/individual wanting more modest sized accommodation. Off road parking is provided for all properties with level access thresholds provided to each home.

3.1.7 The existing trees along the southern boundary that are protected under a Tree Preservation Order are a major asset to the site and their continued protection and safeguarding of the trees is key to preserving the setting of the site and surrounding neighbourhood.

3.1.8 The site is low-lying and lies partially within a C1 Flood Zone (Areas of the floodplain which are developed and served by significant infrastructure, including flood defences) in the north-east corner. As such this area cannot be utilised for residential development and has therefore been identified for an attenuation basin to store surface water during flood events, with public open space on adjacent land to the east.

3.1.9 The site is drained by a series of below ground surface water pipes that run beneath the internal road layout towards the northern boundary. Some drain directly into the surface water attenuation basin. Others, drain into an infiltration trench (with storage for a 1 in 100-year event and +20% allowance for climate change) east of the main entrance to the site, before continuing eastwards to drain into the attenuation basin. The surface water from the attenuation basin then drains to the north and into an existing surface water sewer in Ffordd Parc Bodnant and Prestatyn Road.

3.2 Landscape Proposals

- 3.2.1 The landscape proposals for the site have been heavily influenced by the retention and safeguarding of the protected woodland along the southern boundary of the site. The Root Protection Area (RPA) has been defined (by an arboriculturist) to avoid the risk of damage to the root plate of the trees and to ensure a suitable area is preserved and protected for the long-term health and growth of the trees. The line of trees are an important landscape feature, not just of the site, but for the surrounding neighbourhood and the eastern approach to Prestatyn. They provide an important setting to the proposed development (refer to Figure 3-2) and a green backdrop when viewed from the north and within the site. They also provide a visual screen from Nant Hall Road and a degree of privacy for the properties along the southern boundary and visual amenity for the adjacent shared use cycle path that connects the proposed development to the west and town centre of Prestatyn.
- 3.2.2 The existing hedgerows along the north and eastern boundary has also been retained and protected and form an important linear feature for biodiversity and a visual screen to Ffordd Parc Bodnant and the adjacent caravan site. A section of the northern hedgerow and trees would need to be removed in order to create access into the site and allow for visibility splays either side of the junction. The hedgerow would be reinforced with additional planting of native woody species.
- 3.2.3 Street tree planting would be provided where space permits along the internal access roads and at entrances to the cul-de-sacs, trees with a compact form and seasonal colour would be selected and located in areas suitably large to accommodate future growth and development without causing root damage and undue shading.
- 3.2.4 Culinary shrub and perennial planting would be provided in public spaces and at the frontage of properties in clearly defined beds away from areas of potential vehicle overrun or trampling and ornamental hedges along some of the shared property boundaries.
- 3.2.5 Wildflower verges and areas of open species rich grassland would deliver biodiversity benefits and areas for informal amenity. These areas would be more diverse than the existing field that is classed as Grade 1 Best and Most Versatile agricultural land and Improved Grassland (B4) and has limited ecological value. The north-eastern parcel of the site that is prone to flood risk and also contains the attenuation basin is considered likely to deliver some biodiversity benefits and managed as a wetland meadow habitat.





Figure 3-3: Proposed Development Layout – Landscape Plan

4 Green Infrastructure Assets (GIA)

4.1 GI Macro Level and Site Context

- 4.1.1 The site is located in Prestatyn, a primary coastal settlement within the county of Denbighshire. Positioned on the eastern edge of the North Wales coastal plain, the town serves as a key gateway between the Irish Sea coast and the Clwydian Range. Historically significant as a Roman station and later developed as a notable Victorian seaside destination, the site context is defined by this blend of ancient heritage and structured 19th and 20th-century urban expansion.
- 4.1.2 The Clwydian Range and Dee Valley National Landscape provide a significant rural backdrop and upland hinterland to the south of Prestatyn. This landscape is highly scenic and is accessible via an extensive network of footpaths, including the Offa's Dyke Path National Trail, which reaches its northern terminus nearby. The site lies within approximately 1.5 kilometres of the National Landscape boundary. The limestone escarpment of Prestatyn Hillside and the landmark peak of Graig Fawr are prominent visual features from the upper reaches of the surrounding area, serving as popular venues for walkers and offering panoramic views across the Liverpool Bay.
- 4.1.3 A local watercourse, known as the Prestatyn Gutter (or "The Cut"), manages the hydrology of the lowland area. It flows in a westerly direction to the north of the site, collecting runoff from the southern hills before eventually discharging into the River Clwyd estuary near Rhyl. This blue infrastructure corridor provides important ecological connectivity through the residential and agricultural fringes of the town.
- 4.1.4 Prestatyn is an established residential and commercial hub within the Denbighshire Local Development Plan (LDP) settlement boundary. The site is situated on relatively level ground within a mature residential area, accessed via Bodnant Avenue. This network of residential streets is fed by the A547 (Meliden Road), which serves as the primary arterial link between Prestatyn and the neighbouring village of Meliden and the city of St Asaph to the south-west.
- 4.1.5 The area surrounding Bodnant Avenue has transitioned over the last century from edge-of-town agricultural land to a settled residential community. The development pattern reflects the town's progressive expansion eastward and southward from the historic core and railway corridor. The immediate vicinity includes a mix of mid-20th-century housing and modern community infrastructure, including Prestatyn High School, representing the continued evolution of the town's eastern residential suburbs within the coastal plain.

4.2 Green Infrastructure Assets at Macro Level

- 4.2.1 There are various green infrastructure assets within the immediate vicinity of the Bodnant Avenue site, with the town of Prestatyn offering a mix of coastal, recreational, and semi-natural spaces. The following green infrastructure assets lie within (or just outside) a 1 kilometre search area from the centre of the site:

Prestatyn Green Infrastructure Assets	Description	Distance from Centre of Site
Prestatyn High School Playing Fields	Extensive managed grasslands and sports pitches immediately adjacent to the site, providing significant open space.	50 metres
Prestatyn Gutter / Prestatyn Cut	A drainage channel and watercourse corridor that provides linear blue-green connectivity through the town.	250 metres
Coronation Gardens	Formal public park located to the north-east, featuring managed lawns, flower beds, and seating areas.	650 metres
The Morfa (Prestatyn Morfa)	Large area of open recreational ground and semi-natural coastal grassland located towards the shoreline.	800 metres
Prestatyn Sand Dunes (Local Nature Reserve)	Part of the wider coastal defense and habitat system, providing specialist maritime flora and fauna habitats.	900 metres
Prestatyn Promenade & Beach	A major linear asset providing coastal connectivity, recreational space, and public access to the Irish Sea.	1,000 metres
Offa's Dyke Path (Northern Terminus)	A nationally significant recreational trail that connects the coastline to the Clwydian Range and Dee Valley AONB.	1,100 metres
Coed Bell / Graig Fawr (Bryn Newydd)	Rising ground to the south-east consisting of woodland and limestone grassland, forming part of the Clwydian Range foothills.	1,200 metres

Table 4-1: Bodnant Avenue Green Infrastructure Assets

4.3 Connectivity

4.3.1 Accessibility to the green infrastructure assets identified above is generally good and provided by a combination of the local road and footpath network. However, these assets are not consistently signposted, and their locations are not immediately obvious to those who are not local residents compared to others familiar with the area. In terms of connectivity, physical links between the assets are currently limited, relying primarily on "grey infrastructure" such as established footpaths and residential roads.

4.3.2 The site is directly served by a designated Public Right of Way (PRoW) that traverses the land from north to south, providing a pedestrian link through the site. At the northern boundary, the site is accessible via near the junction between Ffordd Parc Bodnant and the A548. This internal path forms part of the wider local PRoW network, which facilitates movement between the residential areas of Prestatyn and the surrounding Denbighshire countryside, including links toward the rising slopes of the Clwydian Range and the Offa's Dyke Path.

4.4 The Site and GI Assets at Micro Level

4.4.1 The site is constrained at a micro level by the red line boundary of the planning application and the physical features of the site boundary that define the existing field pattern. The primary green infrastructure components of the site and the immediate surrounding area are described in the table below:

4.5 Site Analysis and Initial Design Response

4.5.1 Site analysis identifies key landscape elements and visual considerations that must inform the design development stages. Essential to this is the protection of the line of trees subject to a Tree Preservation Order (TPO), which represents a significant statutory constraint and a valuable ecological asset.

4.5.2 The design response must prioritize the retention and potential enhancement of the existing north-south public footpath. This ensures continued permeability and connectivity for the local community, integrating the development into the existing pedestrian framework. Furthermore, the development layout must respect the Root Protection Areas (RPAs) of the TPO-protected trees to ensure their long-term viability as a green screen and habitat corridor.

Table 4.2 Green Infrastructure Assets of proposed development site

Broadleaved Woodland	Woodland is a strong landscape feature of the site perimeters. The southern boundary is defined by mature broadleaved woodland strip located along Nant Hall Road. This woodland provides important habitat for foraging and commuting bats and nesting birds. A Tree Survey (to BS 5837) has identified the Root Protection Areas (RPAs) of trees overhanging the site boundary to ensure their protection during construction. The woodland serves multiple functions as habitat, visual screening for adjacent properties, and high-value visual amenity.
Hedgerows and Hedgerow Trees	The site is predominantly bounded by a mix of native hedgerows and individual mature trees. The eastern and southern boundaries contain established woody vegetation that provides essential linear corridors for foraging and commuting bats (as identified in the 2025 Bat Survey). These boundaries are being reinforced with extensive new native species-rich hedgerow planting (double-staggered) to enhance biodiversity and nesting opportunities. Key specimen trees are retained within the proposed open space and site margins to maintain the green character of Bodnant Avenue.
Watercourses	There are no significant open watercourses flowing through the site; however, the northern section of the site (adjacent to Prestatyn Road) is designated as a Public Open Space containing a large Flood Basin. This basin and the associated Sustainable Drainage System (SuDS) create a new "Wetland Meadow" habitat. This creates a riparian-style environment within the site that improves local water management and provides a diverse ecological niche for herpetofauna and invertebrates, which was previously absent from the poor-quality grassland.

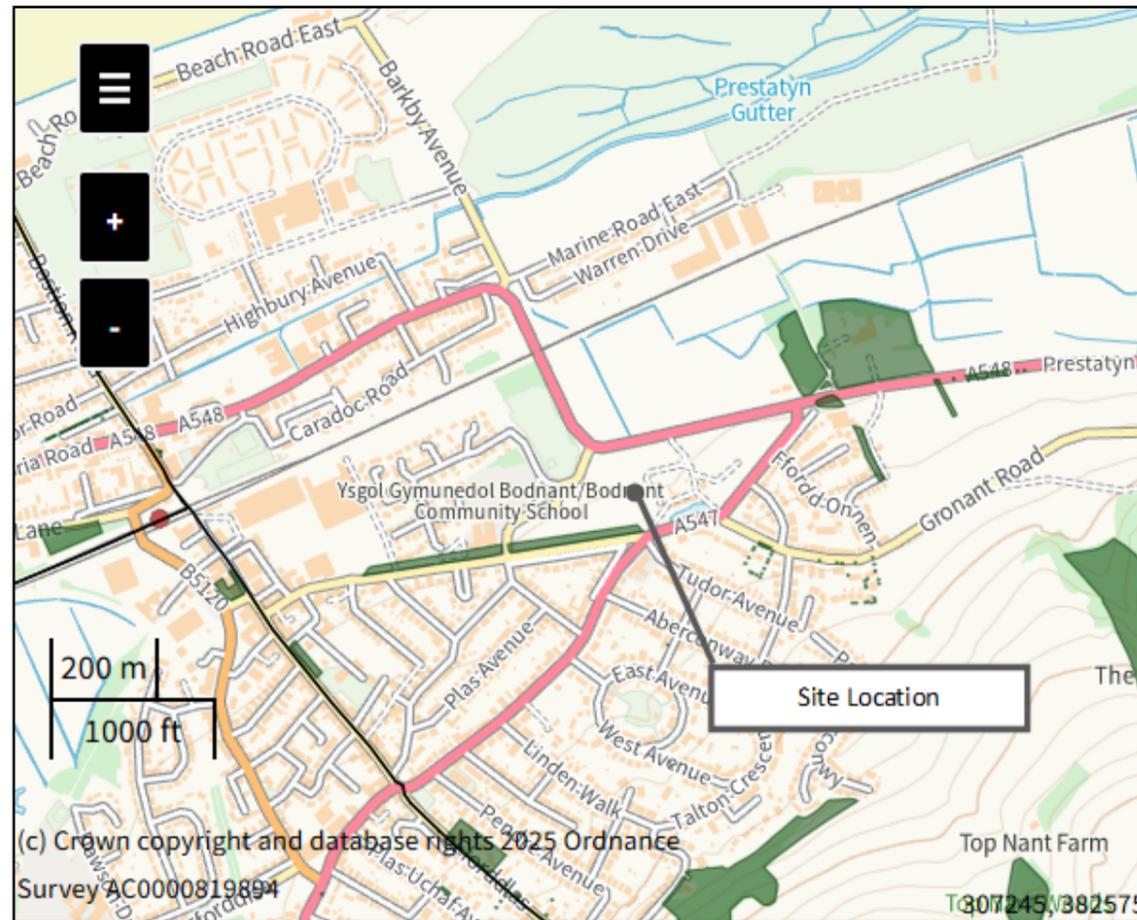


Figure 4-1: An extract from Denbighshire County Council Website showing (highted green) the location of TPO trees in the vicinity of the site (website access on the 17/02/2026)

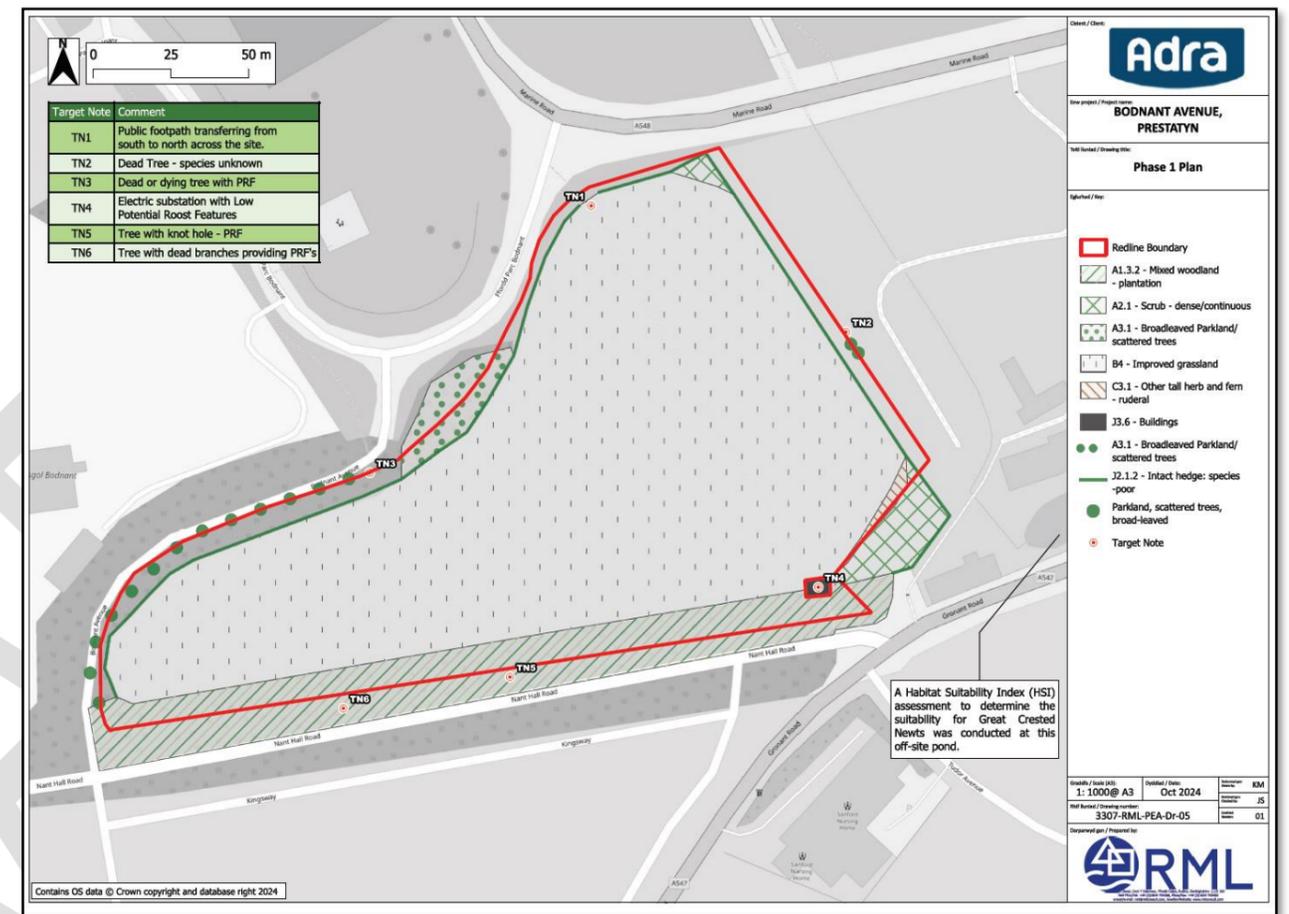


Figure 4-2: Phase 1 survey of the site carried out on the 20/08/2024

5 Biodiversity Statement

5.1 Applying the Step-Wise Approach and principles of DECCA.

5.1.1 Planning Policy Wales (PPW12) advocates a Step-Wise approach to be undertaken when considering new development and how multi-functional green infrastructure has been incorporated into the development. DCC guidance¹⁰ requires a Biodiversity Statement that outlines the Step-Wise approach taken while applying the DECCA principles to retain and avoid adverse impact to ecological features, within and around the site, and secure a net benefit for biodiversity. A record of how the Step-Wise approach has been followed is set out in the table below, and how the proposed development plans to achieve Net Benefits to Biodiversity (NBB).

5.2 Net Biodiversity Benefits (NBB)

5.2.1 Good practice guidance defines a net benefit for biodiversity as meaning:

“any development should leave ecosystems and biodiversity in a much better state than before. This is done by securing immediate and long-term, measurable and demonstrable benefit, mainly on or preferably right next to the site.”

5.2.2 In striving to achieve NBB, the viability of the proposed development also needs to be carefully considered. Housing density needs to be at a certain level to deliver affordable homes and to achieve the vision as a *‘more prosperous place to live, work, visit and invest’*.

5.2.3 The existing field that covers most of the site is classed as Grade 1 Best and Most Versatile agricultural land and Improved Grassland (B4) and has limited ecological value. The majority of this grassland area would be lost as a direct result of the proposed development, but the lower, northern end of the field would remain and be managed as a Public Open Space with a flood basin with opportunities of meadow providing benefits to pollinators and invertebrates. Adra (the ‘Applicant’) would be responsible for the ongoing maintenance and management of these areas.

¹⁰ www.denbighshire.gov.uk/en/documents/planning-and-building-regulations/ldp/evidence-monitoring-and-information/denbighshire-green-infrastructure-assessment.pdf

The Step-Wise Approach	Table 5-1: Step-Wise approach record
Avoid	<ul style="list-style-type: none"> The existing line of trees at the southern boundary of the site would be retained and protected. The health and condition of the trees would be monitored. Check and adjust the development footprint to ensure zero encroachment into the Root Protection Areas (RPA's) wherever feasible. The existing trees at the junction of Prestatyn Road and Ffordd Parc Bodnant must be protected during the construction of the new site entrance.
Minimise	<ul style="list-style-type: none"> Removal of existing hedgerows would be kept to a minimum. Construction timing will be restricted (avoiding bird nesting season) to minimise direct harm to wildlife. Lighting design for the new dwellings will be "bat-friendly" (directional, low-intensity, and shielded) to minimise the impact of light spill on the retained boundary habitats. Root Protection zones (RPAs) around boundary trees will be enforced via fencing to prevent root compaction. A Construction Environmental Management Plan (CEMP) would be prepared prior to the proposed development commencing on site and set out Reasonable Avoidance Measures to reduce any adverse effects during the construction phases.
Mitigate/Restore	<ul style="list-style-type: none"> Additional tree and hedgerow planting would be provided along the northern boundary of the site to enhance existing tree belt. Restoration of biodiversity within the northern Public Open Space. This area will transition from agricultural grassland to a managed "Wetland Meadow" and attenuation basin, providing new ecological niches. Native species-rich hedgerows will be restored and augmented along the site perimeters where gaps currently exist, ensuring structural connectivity is maintained. Seed the SuDS Flood basin with a "Wetland Meadow" mix rather than standard amenity grass. This provides habitat for invertebrates and foraging ground for birds while performing its drainage function. For any trees removed to facilitate the "Visibility Splay" at the Bodnant Avenue entrance, a 3:1 replacement ratio should be implemented within the Public Open Space area using native species like small leaved lime and bird cherry. All garden fences for plots backing onto the southern woodland (e.g., Plots 10-20) must include 13cm x 13cm "Hedgehog Highways" at the base to ensure the site remains permeable to small mammals.
Compensate On-Site	<ul style="list-style-type: none"> Installation of integrated bat boxes (e.g., Istock Enclosed Bat Box 'C') and bird nesting bricks within the fabric of the new residential buildings Manage the POS as "Wetland Meadow" (managed with one late-summer cut) to provide a net gain in pollinator units, compensating for the loss of the central scrub area. Implementation of a planting palette for the new residential gardens and communal areas to provide a net gain in floral diversity and resources for pollinators compared to the current monoculture.
Compensate Off-Site	<ul style="list-style-type: none"> As the site layout currently demonstrates a Net Gain through the Public Open Space (POS) and SuDS features, off-site compensation is not anticipated to be required.

5.3 Compliance with the principles of DECCA

5.3.1 The proposed development at Bodnant Avenue provides opportunities to align with the five principles of DECCA and how these are achieved are summarised below: -

Diversity

The proposed development preserves high-value ecological features, including boundary vegetation and mature trees, ensuring no significant loss of protected species populations. To achieve a biodiversity net gain, existing low-value "improved" grassland will be replaced with a species-rich "Wetland Meadow" mix within the Public Open Space (POS) and flood basin.

Extent

5.3.2 The development is strictly confined to the red line boundary as defined in the Proposed Site Layout. Adra retains long-term responsibility for the ecological management of all land within this boundary, ensuring that green infrastructure—including the northern open space and "Active Travel" green links—is maintained in perpetuity. The layout specifically protects high-value southern and western boundary woodlands and allocates 2,800m² to Public Open Space, dedicated to biodiversity enhancement and flood resilience.

Condition

5.3.3 Protecting existing ecosystems is a priority. The layout incorporates buffers and "no-build" zones to preserve the high-value broadleaved treeline along Nant Hall Road and Ffordd Llys Nant. Adra is committed to coordinating with adjacent landowners and the Local Planning Authority to mitigate any potential impacts from site lighting or drainage on these habitats.

5.3.4 Retained habitats will be enhanced through a long-term Landscape and Ecological Management Plan (LEMP) and actively managing the new wetland area to ensure high ecological quality, upgrading the land from its current derelict agricultural state.

Connectivity

5.3.5 A primary ecological linkage is established via the Active Travel Network through the Public Open Space. This continuous green infrastructure facilitates the movement of pollinators and small mammals from the north of the site toward the residential clusters, successfully integrating the development into the local ecological network.

Adaptability to Change

5.3.6 The layout features a dedicated "Attenuation Basin" and a Sustainable Drainage System (SuDS) designed in accordance with TAN 15. Given the site's topography and the strategic placement of the basin within the northern open space, the development is well-equipped to manage extreme weather events and remains at low risk of flooding.

5.3.7 The inclusion of a Flood Basin (SuDS) specifically addresses climate change adaptability. This feature allows the site to manage increased surface water run-off, protecting the local ecosystem and surrounding infrastructure from weather extremes. The basin would be seeded with a grass mix that is tolerant of seasonal inundation. Elsewhere, drought tolerant and shade tolerant grass seed mixes would be used on verges and areas of grassland.

