

Baglan Bay - Site Separation: Green Infrastructure Statement

National Grid

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Quality Information

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1. Introduction

AECOM was instructed by National Grid (hereafter the Client) to produce a Green Infrastructure Statement to support the planning application for the installation of a potable water pipeline, as part of the 'site separation works', (hereafter referred to as the Proposed Development). The Proposed Development is in Baglan Bay, Port Talbot, (hereafter referred to as the Site; the red line boundary for the Site is shown in Appendix A).

The objectives of this Green Infrastructure Statement are to demonstrate how the Proposed Development has:

1. applied the step-wise approach to mitigation;
2. utilised the DECCA (Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience) Framework to support ecosystem resilience with regards to green infrastructure;
3. explored opportunities for incorporating green infrastructure, paying due regard to the Building with Nature Standards Framework (BwNSF) (Building with Nature, 2022); and,
4. achieved net benefits for biodiversity (NBB).

Planning Policy Wales outlines that *"green infrastructure is the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Component elements of green infrastructure can function at different scales and some components, such as trees and woodland, are often universally present and function at all levels. 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. At a local scale, it might comprise parks, fields, ponds, natural green spaces, public rights of way, allotments, cemeteries and gardens or may be designed or managed features such as sustainable drainage systems. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks."*

Following a pre-application consultation with the local authority ecologist, a minor adjustment to the route was made to avoid a small group of trees at the southwestern edge of the substation. This report has subsequently been updated (Revision 3) for the route adjustment. In addition, the local county ecologist requested that the habitats identified during the initial survey by Jacobs were mapped using Phase 1 Habitat (JNCC, 2016 standard methodology) instead of UK Hab (standard V2.01 methodology, Butcher et al. 2023). The Ecology Report (which has been used to inform this report) was therefore also updated (Jacobs, 2026). It is understood that no new field survey was undertaken by Jacobs as the route was only diverted for a few metres across an area of bare ground which was covered in the previous survey (Jacobs 2025). The detailed notes and photographs taken during the previous field survey were used to generate the Phase 1 habitat map (Jacobs 2026).

1.1 Proposed development

The Proposed Development involves the underground installation of a potable water pipeline, approximately 1 km in length, from the National Grid Baglan Bay 275kV Substation to Marden Park industrial estate. The works will involve excavation of an open trench approximately 0.5 m wide and 1.2 m deep (with necessary working area of approximately 3 m wide during construction). After installation, existing soil will be reinstated appropriately over the pipeline. It is understood that re-instatement tree or shrub planting is not possible due to potential damage to the pipeline from tree roots and any new habitat creation on or adjacent to the Site is not possible as land (outside of the substation) is not in National Grid ownership and the substation compound needs to be kept clear of vegetation for on-going operation and security.

The Proposed Development is shown in Appendix A. Habitats along the route (within approximate 50 m buffer), are shown in Appendix B. The adjacent existing minor road will be used as a haul road.

Other works, which are 'permitted development', are within or adjacent to the National Grid substation compound and include removal, re-routing or installation of underground cables and drainage. No Sustainable Drainage Systems (SuDS) are proposed. These works are all within areas of hard-standing and are considered of negligible ecological impact.

Full details of the Preliminary Ecological Appraisal survey of the route are provided in the Ecological Report (Jacobs, 2026).

1.2 Legislation and Policy

1.2.1 Wildlife Legislation

The following wildlife legislation has been considered when preparing this statement:

- Wildlife and Countryside Act (WCA) 1981 (as amended);
- Countryside and Rights of Way (CROW) Act 2000;
- Environment (Wales) Act 2016;
- The Conservation of Habitats and Species Regulations 2017 (as amended);
- Protection of Badgers Act 1992; and
- Environment Act 2021.

Details of how this legislation, and the below summarised national and local planning policies, relates specifically to species/species groups that are relevant to the Proposed Development are also provided in Appendix C.

1.2.2 National Planning Policy

Planning Policy Wales (PPW) (Welsh Government, 2024) sets out the land use planning policies of Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.

The National Plan 2024 (Welsh Government, 2021) sets out Wales' national development framework that details the Welsh Government's twenty-year plan for shaping the growth and development of the country.

Further information on the relevant parts of the PPW and the National Plan is provided in Appendix C.

1.2.3 Local Planning Policy

Relevant local planning policies for Neath Port Talbot County Borough Council are detailed in the following document:

- Neath Port Talbot County Borough Council Adopted Local Development Plan (LDP) 2011-2026. Adopted January 2016. Once finalised and adopted, the Replacement LDP 2023-2038 will replace the existing LDP as the Statutory Development Plan for the County Borough; and,
- Neath Port Talbot Council: Biodiversity Duty Plan (2023-2026).

Appendix C provides a summary of relevant local planning policies. For the precise wording of each specific policy please refer to the source document. This planning policy has been considered when assessing potential ecological constraints and opportunities identified by the desk study and field surveys; and, when assessing requirements for further survey, design options and ecological mitigation.

2. Methods

The assessment undertaken in this green infrastructure statement follows guidance from the step-wise approach, the DECCA Framework, Natural Resources Wales's (NRW) guide for resilient ecological networks (Garrett & Ayling, 2021) and the BwNSF (Building with Nature, 2022) to inform a qualitative comparison between baseline biodiversity and proposed post-development biodiversity to determine the overall impact to biodiversity from the Proposed Development.

2.1 Baseline Information

The baseline conditions for the Site, which have been considered in this Green Infrastructure Statement, are detailed in:

- Jacobs (2026). Baglan Bay Site Separation Ecological Report. Document No.: PDD-102592-REP-003. Version: P03

2.2 Post Construction Information

The following document has informed the proposed works and post construction for the Site:

- Jacobs (2026) Baglan Bay Site Separation: CDM Plan. 28th July 2026. Revision P03. Drawing Number PDD 102592-LAY-0200

2.3 Step-Wise Approach

This statement demonstrates the step-wise approach which should be undertaken to mitigation, as illustrated in Plate 1 and detailed in Section 6.4.15 of PPW (Welsh Government, 2024).

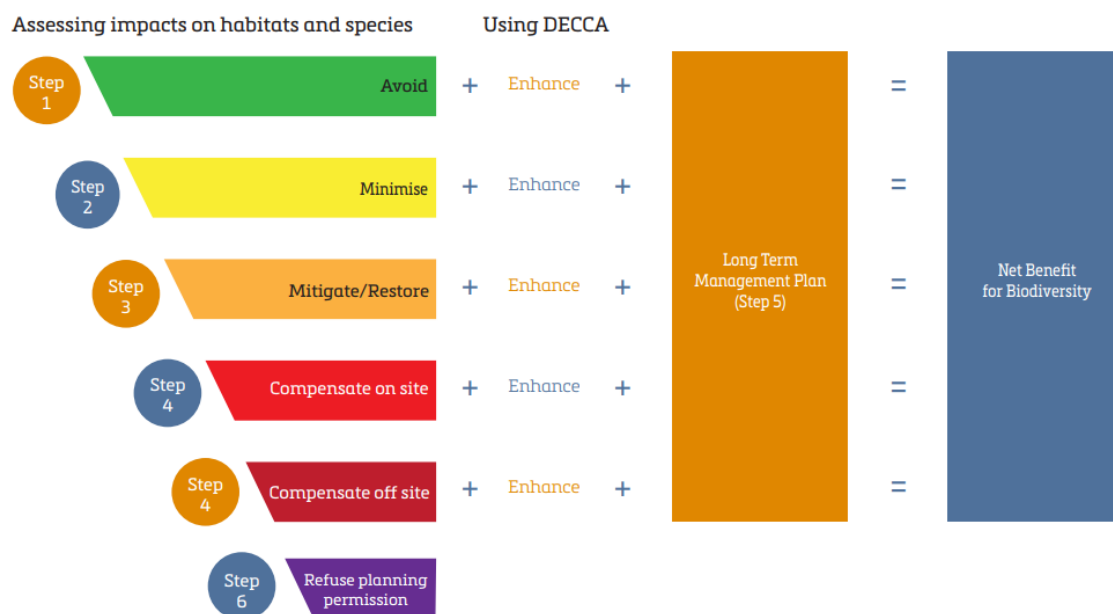


Plate 1: Step-wise approach to mitigation

(Source: Planning Policy Wales (Welsh Government, 2024))

The step-wise approach sets out the steps in order of priority to ensure that adverse effects on biodiversity are reduced. The measures undertaken at each step must be incorporated with enhancement measures and the principles of the DECCA Framework (outlined in Section 2.4) to ensure a net benefit for biodiversity is achieved.

- The first priority is the avoidance of impacts on biodiversity.

2. If avoidance is not possible, adverse impacts to biodiversity must be minimised, by reducing the size of Proposed Development and maintaining the connectivity of habitats. Impacts must also be minimised for Section 7 habitats and features used by Section 7 species to ensure their populations are maintained.
3. If impacts cannot be avoided or sufficiently minimised then adverse effects to biodiversity must be mitigated against, and/ or habitats and features for species restored. The mitigation and restoration must target the specific adverse effects of the Proposed Development, seek to restore in excess of like-to-like, and account for factors like time lags in recovery of habitats and species populations.
4. When these first three steps have been exhausted, compensation on-Site (4a), or off-Site (4b) if not otherwise feasible, is required. Compensation must always be a last resort and must be of significant magnitude to fully compensate for any loss, be place based, and take account of the Section 6 Duty, the DECCA framework and appropriate ecological advice from the local authority Ecologist, NRW or a suitably experienced ecologist.
5. A Long-Term Management Plan should be produced setting out the management of the Site and future monitoring arrangements for all secured measures. The management plan must identify the funding mechanisms in place to meet the management plan objectives and the achievement of net benefits for biodiversity.
6. Failure to action any of these steps will result in a planning application being refused.

2.4 DECCA Framework

This statement demonstrates how the Proposed Development supports ecosystem resilience. Ecosystem resilience is defined by NRW (Garrett & Ayling, 2021) as:

‘the capacity of ecosystems to deal with disturbances, either by resisting them, recovering from them, or adapting to them, whilst retaining their ability to deliver services and benefits now and in the future’ (Disturbances are interpreted to mean pressures and demands on the ecosystem).”

Efforts to maintain and strengthen the following attributes within the DECCA Framework has been considered to support ecosystem resilience in association with the Proposed Development:

- **diversity** at all scales including genetic, species, habitat and ecosystems or landscape scale;
- **extent** of ecosystems and habitats;
- **condition** of ecosystems and biodiversity, including their structure and functioning; and
- **connectivity** between and within ecosystems and habitats

As outlined in Plate 2, these four ecosystem attributes and their emergent properties of adaptability, recovery and resistance from pressures and demands are understood to contribute to ecosystem resilience.

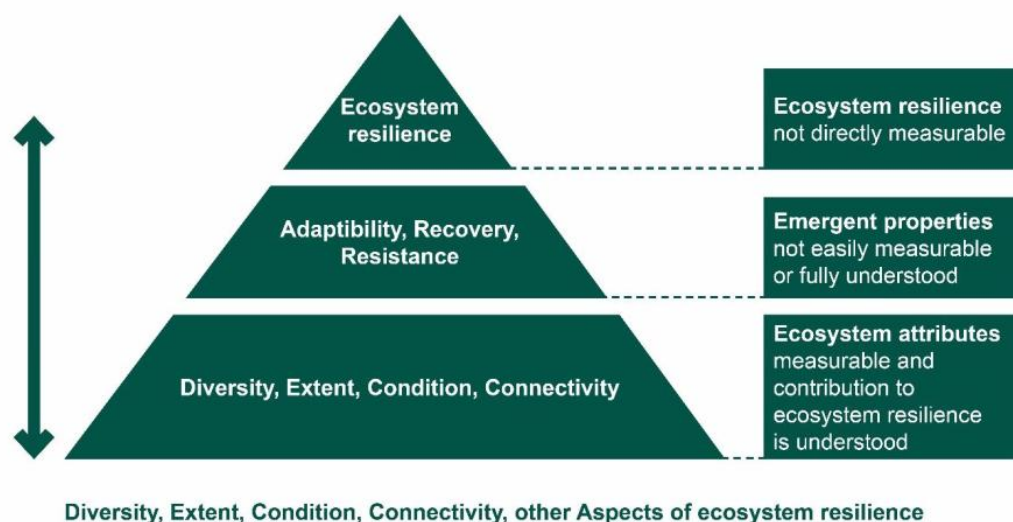


Plate 2: DECCA framework showing the relationship between the attributes and the emergent properties of resilience

(Source: Terrestrial and freshwater Resilient Ecological Networks: a guide for practitioners in Wales (Garrett & Ayling, 2021))

2.5 Building with Nature Standards Framework

Opportunities for incorporating green infrastructure has been undertaken paying due regard to the BwNSF (Building with Nature, 2022). The BwNSF sets out best practice standards to define a benchmark of good green infrastructure and how to deliver it. There are twelve standards which listed below. For full details on each standard refer to the original text (Building with Nature, 2022).

- Core Standards
 - Standard 1 Optimises Multifunctionality and Connectivity.
 - Standard 2 Positively responds to the Climate Emergency.
 - Standard 3 Maximises Environmental Net Gains.
 - Standard 4 Champions a Context Driven Approach.
 - Standard 5 Creates Distinctive Places.
 - Standard 6 Secures Effective Place-keeping.
- Wellbeing Standards
 - Standard 7 Brings Nature Closer to People.
 - Standard 8 Supports Equitable and Inclusive Places.
- Water Standards
 - Standard 9 Delivers Climate Resilient Water Management.
 - Standard 10 Brings Water Closer to People.
- Wildlife Standards
 - Standard 11 Delivers Wildlife Enhancement.
 - Standard 12 Underpins Nature's Recovery.

3. Baseline

The baseline conditions of the Site are summarised below from the baseline reports listed in Section 2.1 illustrated in Appendix A.

3.1 Designated Sites

There is one statutory designated site within 2km: Crymlyn Burrows SSSI 1 km NW.

There are 19 non-statutory designated sites within 2 km (shown in Appendix C). Most are more than 500 m away; however, the Site is partially located within the northwest area of 'Marden Park Baglan' Site of Interest for Nature Conservation (SINC) which is designated for four Priority species and Open Mosaic Habitats on Previously Developed Land (OMHPDL). Plant species listed in Marden Park Baglan SINC citation which are associated with OMHPDL include: alder buckthorn *Frangula alnus*, thyme-leaved sandwort *Arenaria serpyllifolia*, distant sedge *Carex distans*, basil-thyme *Clinopodium acinos*, common cudweed *Filago vulgaris*, round-leaved crane's-bill *Geranium rotundifolium*, sharp rush *Juncus acutus*, hawkweed oxtongue *Picris hieracioides*, wild mignonette *Reseda lutea*, and knotted pearlwort *Sagina nodosa*. A moss, yellow feather-moss *Homalothecium lutescens*, is also listed. However, where the Site overlaps within the northwestern part of the SINC, the habitats largely consisted of dense/continuous scrub and broad-leaved plantation woodland.

3.2 Habitats

The pipeline is to be routed from the National Grid Baglan Bay 275kV Substation to Marden Park industrial estate (as shown in Appendix A). There are up to seven structures/small buildings within the substation compound, which are surrounded by hard-standing. The substation lies adjacent to Baglan Bay Power Station. An artificial waterbody (associated with the adjacent power station) lies c. 50 m southwest.

The Proposed Development area and 50 m buffer, where access allowed, was surveyed by Jacobs in June 2025 (the survey area and Phase 1 habitats are shown in Appendix B). Habitats consisted mainly of semi-improved, neutral grassland, ephemeral/short perennial habitat, built-up areas and bare ground. Two areas of dense/continuous scrub and mixed, plantation woodland also occurred within the Site. The areas of semi-improved, neutral grassland and ephemeral/short perennial habitat fall within the definition of the Priority habitat Open Mosaic Habitats on Previously Developed Land (OMHPDL) (Jacobs, 2026).

The distribution of habitats is shown in Appendix A.

The Site is within a largely disused industrial area with brownfield land consisting of grassland, hard-standing or sparsely vegetated land intersected by minor roads. Some of these areas have scattered scrub, small patches of dense scrub and mixed woodland. In the wider area there are warehouses, office parks, an innovation centre with landscaped areas including ponds and a small solar farm. The coast (with sand dunes) lies c. 1 km south-west and saltmarsh c. 250 m north-west. The built-up area of the town of Port Talbot lies to the south-east; the River Neath to the north-west; and the M4 motorway to the north-east.

3.3 Species

The following protected and priority species and species groups have been assessed by Jacobs (Jacobs, 2026) as having potential to be present on Site based on habitat suitability. The desk study and field survey were undertaken in 2025 and the full assessment is detailed in the Ecology Report (Jacobs, 2026).

- Protected and notable plants.
 - The PEA desk study (Jacobs 2025a) returned records, within 2 km of the Site, of nine plant species listed as Species of Principal Importance (SPI) under Section 7 of the Environment (Wales) Act 2016 and four species listed under Schedule 8¹ of the Wildlife and Countryside Act 1981 (as amended) – the nearest record was of Deptford pink *Dianthus armeria* (a protected plant species listed on Schedule 8) recorded approximately 30 m from the Proposed Development. The open mosaic habitat on Site provides suitable habitat for several of these notable and protected plants, however the PEA field survey

¹ Schedules on Wildlife and Countryside Act 1981, as amended. On-line: <https://www.legislation.gov.uk/ukpga/1981/69>

identified none except for one SPI, namely basil-thyme *Clinopodium acinos*, which was identified on Site within sparsely vegetated urban land.

The PEA survey was carried out at the end of June 2025, which is an optimal time for botanical survey as most plants would be fully grown and visible. However, the survey was carried out after a period of particularly hot and dry weather therefore some plants may have died back and so may not have been visible. The woodland, in Marden Park Baglan SINC, could not be fully accessed for survey therefore alder buckthorn *Frangula alnus*, which is a notable species recorded within the SINC, may not have been identified during the PEA survey, if present.

- Bats.
 - The PEA desk study (Jacobs 2025a) returned records within 2 km of the Site for common pipistrelle *Pipistrellus pipistrellus*; soprano pipistrelle *Pipistrellus pygmaeus* and noctule *Nyctalus noctula*. All bats are fully protected under the Conservation of Habitats and Species Regulations and the Wildlife and Countryside Act 1981 (WCA). As well as being protected under the WCA, the above species are Section 7 species of Principal Importance for Conservation in Wales (Environment (Wales) Act 2016).
 - No roosting bats were identified within the Site (Jacobs 2025a). The PEA survey identified no potential roosting features on trees or buildings/structures within the Site. Although the area of mixed woodland at the eastern end of Site (Marden Park Baglan SINC) couldn't be fully accessed for survey it was considered likely unsuitable for roosting bats as trees comprised semi-mature Italian alder *Alnus cordata* and pine *Pinus* sp. which, due to their age and form, are considered unlikely to have features suitable for roosting bats.
- Terrestrial invertebrates.
 - The PEA desk study identified 29 species of Principal Importance within 2 km (Jacobs, 2025a). These species are also Section 7 species. Many of these have the potential to be found on Site, in the open mosaic habitat, scrub and woodland.
- Breeding birds.
 - Breeding birds are protected under the WCA. The PEA desk study identified records of 21 Schedule 1² bird species within 2 km. Breeding birds have potential to use trees and scrub habitat on Site. Ground nesting birds, such as lapwing *Vanellus Vanellus*, may nest in grassland or sparsely vegetated areas.
- Great Crested Newt and other amphibians.
 - The PEA desk study identified no records of great crested newt within 2 km. There are no waterbodies on the Site although there are four within 250 m. Low numbers of great crested newt *Triturus cristatus* and other amphibians could be present on Site, predominantly in the grassland, scrub and woodland areas. Great crested newt are fully protected under the Conservation of Habitats and Species Regulations and the Wildlife and Countryside Act 1981 (WCA). Great crested newt and common toad are Section 7 priority species.
- Reptiles.
 - The PEA desk study identified records of grass snake *Natrix Helvetica*, common lizard *Zootoca vivipara* and slow worm *Anguis fragilis* within 2 km. Low numbers of common reptile such as common lizard and slow-worm may be present on Site, predominantly in the grassland and edges of scrub and woodland. These species are Section 7 priority species. Reptiles are protected from killing and injury under the WCA.
- Badger.
 - The desk study returned 12 records of badger *Meles meles* including sett locations within 2km of the Site. The nearest and most recent active sett was recorded 1840m south-east of the Site in 2018.
 - There was no evidence of badger found during the PEA (Jacobs, 2025a). However, they may use the Site and/or adjacent habitat for foraging, including grassland, scrub and woodland. Badgers are protected under the Protection of Badgers Act 1992.
- Hedgehog

² Schedules on Wildlife and Countryside Act 1981, as amended. On-line: <https://www.legislation.gov.uk/ukpga/1981/69>

- The desk study returned records of hedgehog *Erinaceus europaeus* within 2 km. Hedgehog may use the Site and/or adjacent habitat for foraging, including grassland, scrub and woodland. They may also use log, brash or leaf piles within the scrub and woodland for refuge. Hedgehog is a Section 7 species.
- Invasive Non-Native Plant Species (INNPS).
 - A cotoneaster species likely to be an INNPS listed under Schedule 9 of the WCA was identified within the Site during the PEA (Jacobs, 2025a). Other invasive plants identified on Site during the PEA (but not listed on Schedule 9) were pampas grass *Cortaderia selloana* and sea buckthorn *Hippophae rhamnoides* (the former is native to South America, and the latter is native to the east coast of England but considered an invasive species elsewhere in the UK).

3.4 Public Rights of Way

There is no Public Right of Way within or adjacent to the Site. The Wales Coast path is c. 200 m north of the Site (from the substation) at its closest point.

3.5 Water

There are no ponds on Site. An artificial waterbody (likely associated with the adjacent former Baglan Bay power station) lies c. 50 m south-west of the substation. There are also several ponds or waterbodies visible from aerial imagery and using Ordnance Survey mapping within 500 m of the Site.

4. Post-construction

The post construction proposals for the Site are summarised below.

4.1 Habitats and Marden Park Baglan SINC

The proposed works will partially impact Marden Park Baglan SINC, which is located at the eastern end of the Site. The works would result in removal of small areas of semi-improved, neutral grassland, dense/continuous scrub, and mixed, plantation woodland within the works area. This would mostly be temporary habitat loss as habitat would be allowed to natural regenerate after pipeline installation, which is anticipated to re-establish relatively quickly - except for the trees removed at the edge of the small strip of plantation woodland, which would not be replanted after works as tree roots would likely damage the pipeline.

The SINC is designated for the presence of the Section 7 Habitat of Principal Importance (HoPI): Open Mosaic Habitats on Previously Developed Land (OMHPDL). However, natural succession by encroachment of scrub is reducing the extent of the OMHPDL significantly within and adjacent to the proposed works area. Therefore, although the proposed works will result in the temporary loss of small areas of habitat and loss of trees at the edge of the small area of plantation woodland, they also provide the opportunity to enhance the SINC, through the clearance of encroaching trees and scrub, and through the careful reinstatement of the substrate post construction to reset the process of natural succession.

4.2 Habitats

The proposed works will result in the temporary loss of relatively narrow strip of Priority habitat: OMHPDL along much of the pipeline route. The extent of the Priority habitat within and adjacent to the Site is shown in Appendix D. OMHPDL within and adjacent to the Site consists of areas of ephemeral/short perennial habitat and semi-improved, neutral grassland. Other habitat loss will be small areas of scattered scrub, dense/continuous scrub, mixed and plantation woodland as well as areas of hard-standing and bare ground as shown in Appendix B. Most habitat would natural regenerate relatively quickly after pipeline installation, except for trees in the SINC, which would not be replanted after works as tree roots would likely damage the pipeline. The pipeline route has been amended to avoid the trees adjacent to the substation, which are located outside of the SINC.

Under the duty to maintain and enhance biodiversity under the Environment (Wales) Act 2016 and align with policy in Planning Policy Wales there is a requirement for development to deliver a Net Benefit for Biodiversity. Habitat creation within or adjacent to the Site is not feasible as land outside the substation is not in National Grid ownership and the substation compound will need to be maintained free of vegetation to enable ongoing operational and security requirements. However, as noted in Section 4.1 above, the OMHPDL is being negatively impacted by encroaching trees and scrub, including invasive, non-native species such as cotoneaster and buddleia. Therefore, although the proposed works will result in the temporary loss of small areas of OMHPDL, they also provide the opportunity to enhance the wider habitat, through the clearance of encroaching trees, scrub and INNS, and through the careful reinstatement of the substrate post construction to allow the re-establishment of early successional plant communities characteristic of OMHPDL. The removal of trees and scrub within the SINC area therefore constitutes an on-site biodiversity enhancement and it is understood that no additional off-site compensation or enhancement measures are required.

Species

The Proposed Development post-construction will result in loss of several small patches of scrub along the route and a small strip of plantation woodland within Marden Park Baglan SINC at the north-eastern end of the scheme. The loss of woodland habitat (3 m wide strips) is a relatively small proportion (up to approximately 2%) of the woodland block which would not be affected, and so should cause negligible effect on the integrity of the small area of woodland and would not cause fragmentation or loss of connectivity for wildlife.

Open mosaic habitat is anticipated to naturally regenerate relatively quickly after soil re-instatement. It is therefore anticipated that associated species would not be significantly affected by habitat loss nor by disturbance from works provided appropriate precautionary method of works and mitigation is in place (as detailed in Table 1 below).

It is understood that enhancement for wildlife, such as provision of bird boxes or log habitat piles, is not possible on or adjacent to the Site as land is not in National Grid ownership. It is also not possible within the National Grid substation compound due to ongoing operational works.

No operational impacts are anticipated as the pipeline would be buried underground with no regular maintenance required.

4.3 Public Rights of Way

No new Public Rights of Way will be created as part of the Proposed Development.

4.4 Water

Proposed works include removal, re-routing or installation of new drainage around the substation compound however this will be via underground drainage pipes. No new waterbodies or SuDS are proposed. An artificial waterbody (likely associated with the adjacent power station) lies c. 50 m south-west of the substation. However, no waterbodies are anticipated to be affected by works.

5. Ecological Impacts and Mitigation

Potential impacts during the construction phase relevant to green infrastructure are:

- habitat loss;
- habitat degradation: and
- species disturbance.

No impacts are anticipated during the operational phase.

The potential impacts to biodiversity and green infrastructure and proposed mitigation are summarised in Table 1. Full details are given in the Ecology Report (Jacobs, 2026).

Table 1. Summary of Ecological Impacts and Mitigation and Enhancement Measures

Ecological Feature	Summary of Potential Impact During Construction without Mitigation	Summary of Mitigation and Enhancement Measures
Woodland and scrub, including Marden Park Baglan SINC:	The Proposed Development will require the permanent removal of c. 3 m wide strips of mixed plantation woodland, dense scrub and scattered scrub across the Site. This would be permanently lost as trees and shrubs cannot be re-planted after works due to root systems causing potential damage to the pipeline. Marden Park Baglan SINC is a non-statutory designated site important for its OMHPDL. It meets criteria for four qualifying Priority species: herring gull <i>Larus argentatus</i>; lapwing; song thrush <i>Turdus philomelos</i> and basil-thyme <i>Clinopodium acinos</i>; and seven contributory plant species associated with OMHPDL. The area of Marden Park Baglan SINC, which is crossed by the pipeline, is mixed plantation woodland; predominantly comprised of semi-mature Italian alder, with several semi-mature pine and ground flora dominated by bramble <i>Rubus fruticosus</i> agg. It is therefore not considered of high ecological habitat value. No notable or protected plant species were identified within the area of woodland and scrub of Marden Park Baglan SINC which is within the Site. The only notable plant species identified on the Site during the PEA survey was basil-thyme <i>Clinopodium acinos</i> which was found within sparsely vegetated urban land (Jacobs 2025) and is not associated with woodland. The Proposed Development may result in the degradation of retained habitat through indirect impacts associated with construction related activities including the potential for pollution from run-off and dust.	The pipeline cannot be re-routed to avoid habitats including Marden Park Baglan SINC due to existing utilities in the road. However, to ensure there is minimal habitat loss, a works exclusion buffer would be set up around the proposed works area to ensure only necessary vegetation is cleared and an Ecological Clerk of Works (ECOW) will conduct a pre-works check of the vegetation for any protected or notable plant (or animal) species and would advise on methods or buffer zones to avoid where possible. After works the removed soil would be re-instated over the pipeline with appropriate top and sub soil layers. However, no trees or shrubs would be replanted over the pipeline. It is likely that the area over the pipeline will naturally re-vegetate relatively quickly with early successional plant species and form part of the open mosaic habitat - the habitat type for which the Marden Park Baglan SINC is designated for. Habitat creation within or adjacent to the Site is not feasible. However, the OMHPDL within the SINC is being negatively impacted by encroaching trees and scrub, including invasive, non-native species such as cotoneaster and buddleia. Therefore, although the proposed works will result in the temporary loss of small areas of OMHPDL across the Site, they also provide the opportunity to enhance the wider habitat, through the clearance of encroaching trees, scrub and INNS, and through the careful reinstatement of the substrate post construction to allow the re-establishment of OMHPDL. The removal of trees and scrub within the SINC area therefore constitutes an on-site biodiversity enhancement for Net Biodiversity Benefit and it is understood that no additional off-site compensation or enhancement measures are required. Industry best practice standards, such as pollution prevention controls, would be implemented to mitigate potential impacts to adjacent retained habitats during construction.
Open Mosaic Habitat on Previously Developed Land (OMHPDL)	The majority of habitat loss consists of semi-improved neutral grassland, sparsely vegetated areas of ruderal and ephemeral plants with bare ground which qualifies as priority habitat: OMHPDL. However, this is anticipated to be temporary habitat loss as following construction and disturbance of the soils, the trench will be backfilled with existing soils, and the Site is likely to revert to mosaic of early successional habitats characteristic of OMHPDL. The Proposed Development could result in the degradation of retained habitat through indirect impacts associated with construction related	The Ecological Report (Jacobs, 2026) provides recommendations that during construction: Impacts on OMHPDL will be minimised as far as possible following standard good practice construction methods. A method statement will be developed to safeguard and enhance OMHPDL. This method statement will detail methods for: - Vegetation clearance. - The storage and re-instatement of soils / substrate following construction to allow for the natural re-establishment of OMHPDL. - The removal and control of encroaching trees, scrub, and invasive non-native species (INNS) impacting OMHPDL within and adjacent to the working area. For INNS cut stems

Ecological Feature	Summary of Potential Impact During Construction without Mitigation	Summary of Mitigation and Enhancement Measures
	activities including the potential for pollution from run-off and dust.	should be treated with an appropriate herbicide to prevent regrowth. There would be temporary loss of OMHPDL during construction. However, after works the Site is anticipated to revert to mosaic of early successional habitats characteristic of OMHPDL.
Species:	Protected and notable plants: There are records of several protected and notable plant species within 500 m (Deptford pink, a protected plant listed on Schedule 8, was recorded within 30 m of the Site). The open mosaic habitat on Site provides suitable habitat for most of these species and also potential for rare bryophytes and lichens. However, no protected plants or notable plants were identified during the field survey, except for basil-thyme (as stated above) which is a Species of Principal Importance and was found in sparsely vegetated open mosaic habitat area on Site. The PEA survey was undertaken within the optimal period at the end of June 2025 however it was carried out after a period of hot dry weather and therefore some plants may have died back. Also, the woodland in Marden Park Baglan SINC could not be fully accessed for survey therefore alder buckthorn, which is a notable species recorded within the SINC, may not have been identified during the PEA survey, if present.	
	Terrestrial invertebrates: The proposed works are due to impact small sections of habitat with the potential to support terrestrial invertebrates including mixed scrub, woodland and herb rich grassland. It is considered that terrestrial invertebrate species will not be detrimentally affected by the proposed works due to the relatively small areas of habitat affected and as surrounding suitable habitats which will not be impacted. Open mosaic habitat should re-establish relatively quickly after works.	For Schedule 8 plant species it is an offence to intentionally pick, uproot, destroy, sell, or possess them without a license. As a precautionary measure an ecologist will conduct a pre-works check of the vegetation for any protected or notable plants and would advise on buffer zones to avoid where possible. If Schedule 8 plants are identified, such as Deptford pink, mitigation may be required, such as avoidance or licensed translocation. This will be species dependent and would be determined following the survey. There is anticipated to be negligible adverse effect on terrestrial invertebrates. Enhancement of the Site for invertebrates, such as provision of sand banks or log 'habitat' piles is not possible as the land on, and adjacent to, the Site is owned by a third party.
	Great crested newts (GCN): There are several waterbodies within 250 m, although no records of GCN within 2 km and no suitable waterbodies within the Site. No waterbodies are anticipated to be impacted by works. Therefore, it is considered low potential for GCN to be present, and low likelihood of impact within the Site due to scale of works. Proposed works would impact small sections of terrestrial habitats with the potential to support GCN including woodland, scrub and grassland.	Vegetation clearance would be conducted under the supervision of an ECoW and following a Precautionary Working Method Statement (PWMS) (Jacobs 2026). Enhancement of the Site for GCN, such as provision of log 'habitat' piles, would not be possible as the land on, and adjacent to, the Site is owned by a third party.
	Common reptiles and other amphibians: The proposed works would impact small sections of habitat with the potential to support common reptiles and amphibians including woodland, scrub and grassland. No waterbodies are anticipated to be impacted by the proposed works. The proposed works are relatively small scale and localised and so are unlikely to have	Vegetation clearance would be conducted under the supervision of an ECoW following a PWMS (Jacobs 2026). Any potential hibernacula (e.g. existing log piles/stone piles) that requires removal would be moved by hand, where possible, under the supervision of an ECoW and to an area outside of the works.

Ecological Feature	Summary of Potential Impact During Construction without Mitigation	Summary of Mitigation and Enhancement Measures
	a significant impact on the local reptile and amphibian population.	Enhancement of the Site for reptiles and amphibians, such as provision of log 'habitat' piles, would not be possible as stated above.
	Breeding birds:	
	The proposed works are due to impact small sections of habitats with the potential to support breeding birds including scrub, woodland and grassland. The Proposed Development works could impact breeding birds by disturbing or destroying active nests, eggs, or chicks during any vegetation clearance, or through noise and vibration from the Proposed Development. Vegetation for ground nesting birds should regenerate relatively quickly after works however the strips of woodland and scrub over the pipeline would be permanently lost. This loss of nesting habitat is a relatively small proportion of the scrub and woodland habitat immediately adjacent to the Site which would not be affected, therefore the loss of these relatively small areas of nesting habitat on Site is not considered likely to significantly impact nesting birds.	To avoid impacts to breeding birds, vegetation and ground clearance should be undertaken outside of the breeding bird season (the main nesting period is start of March to end August inclusive). If vegetation clearance is required during this period, an ECoW must be present to check the area for nesting birds (including ground nesting birds) within 48 hours (at most) prior to removal. Species-specific mitigation may be required including exclusion zones for any active nests found until all chicks have fully fledged the nest. Fledging period and sensitivity to disturbance will vary between species (typically 6-8 weeks). Enhancement of the Site for nesting birds, such as provision of bird boxes, would not be possible within the substation compound nor on any trees adjacent to the Site as land is owned by a third party.
	Bats:	
	The PEA survey identified no potential bat roost features on buildings within the compound nor on trees within or adjacent to the Site. The woodland in the SINC (at the north-eastern end of Site) couldn't be fully accessed for survey however it was considered unlikely to be suitable for roosting bats as it comprised semi-mature Italian alder and pines which are unlikely to have potential roost features. Foraging and commuting bats may be impacted by disturbance if any lighting is proposed during construction. No lighting is proposed during operation of the pipeline.	Although the woodland within Marden Park Baglan SINC is considered largely unsuitable for roosting bats, the potential for roosting bats cannot be completely ruled out as it couldn't be fully accessed for full survey. Therefore, trees are to be felled under a PWMS. Individual trees would be checked by a suitably experienced ecologist for potential roost features prior to removal and appropriate further survey and/or mitigation applied if required. Works will be carried out during the day. If lighting is required, it would be directed downwards and away from vegetated areas to avoid impact to nocturnal wildlife. Where possible, noise barriers are to be used to minimise noise spill into the surrounding area during any works likely to generate noise and/or vibration significantly in excess of the current baseline.
	Badger and hedgehog:	
	No badger activity was identified within the Site when surveyed in June 2025. However, badgers and hedgehog could potentially be using the habitats on Site for foraging or refuge, including the mixed scrub, woodland and grassland. As such, these species and other animals have the potential to be impacted by falling into any excavations left open overnight.	As badgers are highly mobile and can rapidly and readily create new setts a pre-construction badger check will be carried out of the working area including a 30m buffer. If a badger sett is present, a 30m exclusion zone will need to be established from the works. Vegetation clearance would be conducted under the supervision of an ECoW following a PWMS. Additionally, any potential hedgehog hibernacula that requires removal must be moved by hand, where possible, under the supervision of an ECoW and to an area outside of the works. General measures to avoid and/or minimise impacts to animals would include: - Any excavations would be backfilled at end of day, covered overnight, or include a ramp to allow an egress point for any animals that may fall in; - Any open pipework over 150 mm wide would be capped overnight to prevent animals from becoming trapped inside; - Night working and use of artificial lighting during construction are to be avoided where possible, to minimise disturbance to nocturnal wildlife (badgers and bats). If any

Ecological Feature	Summary of Potential Impact During Construction without Mitigation	Summary of Mitigation and Enhancement Measures
		lighting is used it would be directed towards the works and away from any features with potential to be used by light sensitive wildlife with measures to prevent light spill; • If the scope of works changes, then the ecologist would be notified and a new assessment of impacts should be put in place.
Invasive Non-Native Plant Species (INNPS)	The field survey identified a cotoneaster species on Site which is likely listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). Other invasive plants identified on Site (but not listed on Schedule 9) were pampas grass and sea buckthorn. Excavation works and movement of soil potentially contaminated with seeds or root propagules could cause spread of invasive species e.g. on clothes, vehicles and equipment. It is an offence to allow spread of invasive plant species listed on Schedule 9³ into the wild.	As per good practice guidelines, appropriate biosecurity measures will be taken to inhibit the spread of any invasive species on and off- Site following a suitable PWMS. For INNPS cut stems should be treated with an appropriate herbicide to prevent regrowth.

³ Schedules on Wildlife and Countryside Act 1981, as amended. Available on-line: <https://www.legislation.gov.uk/ukpga/1981/69>

6. Building with Nature Standards Framework

BwNSF sets out best practice standards to define a benchmark of good green infrastructure and how to deliver it and how the Proposed Development has paid due regard to the BwNSF (Building with Nature, 2022), with respect to each of its twelve standards, is summarised in Table 2.

Table 2. Summary of Proposed Green Infrastructure Mitigation and Enhancement and its Link to BwNSF

Standard	Mitigation included within the Proposed Construction that aligns with the Standard	Justification for meeting the standard
1. Optimises Multifunctionality and Connectivity	Vegetation would be cleared from the edge of woodland and scrub habitat therefore avoiding habitat fragmentation. To ensure there is minimal habitat loss, a works exclusion buffer would be set up around the proposed works area to ensure only necessary vegetation is cleared.	Maintains connectivity across the Site and adjacent landscape for wildlife, including bats, badger and hedgehog.
2. Positively Responds to the Climate Emergency	Although trees and scrub removed would not be re-planted after works. It is anticipated that these areas would be colonised by early successional species to form OMHPDL.	The existing mixed woodland and scrub habitat lost (the woodland being mostly comprised of non-native trees) is considered of low ecological value. The removal of non-native trees will allow for natural succession of early succession species, of higher ecological value as OMHPDL. Considering the magnitude of the vegetation removal, the impact on climate is considered negligible.
3. Maximises Environmental Net Gains	Enhancement of on-site habitats.	Removal of trees and scrub at edge of the SINC would enhance the OMHPDL.
	Standard pollution control measures.	Pollution control will mitigate against any potential harmful environmental impacts of the Proposed Development on soil and air quality.
	Habitat restoration by appropriate backfilling of the existing soil (with seed bank) and allowing natural regeneration of early successional plant communities.	Vegetation should naturally re-establish relatively quickly after works.
	An Ecological Clerk of Works (ECOW) will conduct pre-works checks for any protected or notable plant or animal species and would advise on methods or buffer zones to avoid impact where possible. Works would be carried out under a PWMS. Timing of vegetation clearance would avoid the nesting bird period, where possible.	Avoid harm and disturbance to wildlife including bats, birds, amphibians, reptiles, badger and hedgehog.
4. Champions a Context Driven Approach	The Site, including Marden Park Baglan SINC, is mostly comprised of OMHPDL which is the habitat type which is anticipated to regenerate naturally after works.	Positively responds to the local context, including the physical environment, such as landscape and urban character.
5. Creates Distinctive Places	The scale of the Proposed Development has been limited to that which is functionally necessary for the proposed works. The Proposed Development is within a former industrial 'brownfield' area. As the pipeline would be installed underground and existing OMHPDL habitat would regenerate relatively quickly after works. It is not considered that there would be any adverse effects on the character and setting of locally important places such as Marden Park Baglan SINC (within the Site). Other non-statutory designated sites are more than 500 m away and Crymlyn Burrows SSSI is approximately 1 km north-west.	No adverse effects on the character and setting of locally important places.

Standard	Mitigation included within the Proposed Construction that aligns with the Standard	Justification for meeting the standard
6. Secures Effective Place-keeping	Production and implementation of PWMS to ensure potential for ecological impacts of the proposed works are minimised. To ensure the implementation of the PWMS, an Ecological Clerk of Works (ECoW) would supervise and advise contractors prior to and during the works, as required. The PWMS will include (but not be limited to): - Ecologist to carry out pre-works checks for potential bat roost features in trees, any evidence of badgers and setts; protected or notable plants; reptiles, amphibians and hedgehogs. - Vegetation clearance works will avoid the bird nesting season where possible. If works are undertaken between 1 March and 31 August, pre-clearance checks for nesting birds will be carried by ECoW within 48 hours prior to works. - All vegetation clearance works should be overseen by ECoW. - Should any protected/ notable species be encountered during the works, all works would cease and advice sought from the ECoW. - Biosecurity measures to prevent spread of non-native invasive plant species such as cotoneaster, in accordance with best practice.	The PWMS demonstrates a commitment to effectively implement, establish and maintain features during construction.
7. Brings Nature Closer to People	There is anticipated to be no significant change to the Site after works as the pipeline will be installed underground and soil re-instated after works. OMHPDL vegetation is expected to naturally regenerate over the pipeline relatively quickly after works.	There would be no fencing nor any change to public access after works. Some of the Site is open public access (excluding National Grid substation compound and private land).
8. Supports Equitable and Inclusive Places	The Site (excluding the substation compound) would be considered safe and accessible, where access allows, after works are completed.	There would be no fencing nor any change to public access after works.
9. Delivers Climate Resilient Water Management	The works have the potential to impact water quality via sediment runoff, surface runoff and accidental spills of oils, chemicals and fuels. Standard pollution control measures will be implemented in accordance with relevant legislative requirements and appropriate industry guidance. The Contractor(s) will utilise good practice pollution prevention methods for activities such as storage of fuels, chemicals and oils, and vehicle washing where required. The proposals for installation of new underground drainage around the substation would also mitigate run-off and potential pollution affects.	The Proposed Development of the pipeline installation should not adversely affect the natural water cycle nor water quality within the Site or at catchment scale. Installation of new underground drainage around the substation should enhance water drainage and mitigate pollution.
10. Brings Water Closer to People	No new waterbodies or SuDS are proposed. The water pipeline and new drainage pipes will be installed underground.	The works are not anticipated to affect the existing hydrology of habitats within or adjacent to the Site.
11. Delivers Wildlife Enhancement	Removal of trees and scrub at edge of the SINC and careful re-instatement of soil after works would enhance OMHPDL e.g. by enhancing habitat for early successional plant species. Wildlife protection measures are secured by implementation of the PWMS.	Protection of wildlife on Site and the creation of new habitat off-site overall provides wildlife benefits.
12. Underpins Nature's Recovery	Works will be carried out under a PWMS and with pollution prevention measures. The	The works are not anticipated to adversely affect important habitats or species within or adjacent to

Standard	Mitigation included within the Proposed Construction that aligns with the Standard	Justification for meeting the standard
	OMHPDL habitat should naturally regenerate relatively quickly after works following appropriate soil re-instatement. Therefore, it is anticipated there would be a negligible effect on important habitats or species, on or adjacent to the Site. Removal of trees and scrub at edge of the SINC would enhance the OMHPDL.	the Site. Removal of trees and scrub at edge of the SINC would enhance the OMHPDL and provide Net Benefit for Biodiversity.

7. Conclusion

A summary of how the Proposed Development has incorporated the Step-Wise Approach to mitigation, the DECCA framework to support ecosystem resilience, and BwNSF to explore opportunities for green infrastructure is provided below.

7.1 Step-Wise Approach

The step-wise approach to mitigation has been utilised in the design of the Proposed Development through consultation with ecological consultants and engineers. A summary of how it has been incorporated through the design process is provided below.

Step 1 Avoid – Impacts to the following ecological features have been avoided:

- retained habitats; and,
- protected and priority species.

Measures to ensure there is minimal habitat loss and protect retained habitats will include works exclusion buffers set up around the proposed works area to ensure only necessary vegetation is cleared. An ecologist will conduct pre-works checks for any protected or notable plant or animal species, (including protected and notable plants, potential bat roost features in trees, reptiles, amphibians, hedgehog, badger and nesting birds where applicable), and would advise on methods or buffer zones to avoid where necessary.

Step 2 Minimise – Impacts to ecological features that cannot be avoided have been minimised by the following measures:

- only the minimum amount of habitat required for the Proposed Development will be removed; and,
- Open Mosaic Habitat on Previously Developed Land would be restored after works by appropriate backfilling of the existing soil (with seed bank) and allowing natural regeneration of early successional plant communities.

Step 3 Mitigate – Measures such as pollution control, will mitigate impacts from pollution to retained habitats. Lighting, if required during construction, will be sensitive to nocturnal species. Pre-works check for protected and priority species will be completed and works overseen by an ECoW.

Step 4 Biodiversity Enhancement On-site – The existing OMHPDL is expected to naturally regenerate relatively quickly after works. The clearance of encroaching trees, scrub and INNS and careful reinstatement of the substrate post construction will enable establishment of early successional species and will enhance the OMHPDL area within Marden Park Baglan SINC. This therefore constitutes on-site biodiversity enhancement and therefore provides overall on-site Net Benefit for Biodiversity.

Step 5 Long Term Management – The careful reinstatement of the substrate over the pipeline post construction should reset the process of natural succession, as early successional communities associated with OMHPDL would establish however trees and shrubs are not likely to re-establish over the pipeline. Therefore, no long-term management plan to manage tree and shrub encroachment over the pipeline would be required.

7.2 DECCA Framework

A summary of how the Proposed Development has incorporated the DECCA framework to support ecosystem resilience is provided below.

Diversity – OMHPDL is anticipated to re-establish relatively quickly after works. The removal of trees and shrubs in Marden Park Baglan SINC and removal of INNS constitutes an on-site biodiversity enhancement.

Extent – A small strip of mixed woodland and mixed scrub would be removed and would not be re-planted over the pipeline after works. As stated above, it is anticipated that these areas would be colonised by early successional species after works.

Condition – It is anticipated that the OMHPDL on site would naturally regenerate relatively quickly to achieve and maintain its baseline condition without the requirement for any management or monitoring due to the nature of this habitat type and existing soils conditions which currently maintain the habitat.

Connectivity – It is considered that there would be negligible effect on woodland and scrub connectivity for wildlife after works as a relatively narrow strip (3 m wide) of trees and scrub would be removed from the edge of existing woodland and scrub. OMHPDL, including herb-rich grassland and sparsely vegetated areas, is anticipated to regenerate after works so connectivity of this habitat would not be significantly affected.

7.3 Building with Nature Standards Framework

As outlined in Section 6, standards of the BwNFS will be incorporated by the Proposed Development.

8. References

Building with Nature (2022) Standards Framework. Version 2. October 2022.

Butcher, B., Carey, P., Edmonds, R., Norton, L. and Treweek, J. (2023) The UK Habitat Classification Manual Version 2.0. [online] Available at: <http://www.ukhab.org.uk>

Garrett H.M. and Ayling S.C. (2021) Terrestrial and freshwater Resilient Ecological Networks: a guide for practitioners in Wales. NRW Evidence Report No. 483, March 2021, Natural Resources Wales.

Jacobs (2025). Baglan Bay Site Separation Preliminary Ecological Appraisal Report. Document No.: PDD-102592-REP-003

Jacobs (2026). Baglan Bay Site Separation Ecological Report. Document No.: PDD-102592-REP-003. Version P03

JNCC (2016) Handbook for Phase 1 habitat survey – a technique for environmental audit, JNCC, Peterborough.

Law, C., and D'aleo, S. (2016) Environmental Good Practice on Site Pocket Book. Ciria. ISBN-13: 9780860177777

Neath Port Talbot County Borough Council Local Development Plan (2011-2026, adopted January 2016). Available on-line:

https://media.npt.gov.uk/media/ca2fbumd/ldp_written_statement_jan16.pdf?v=20240823155047

Neath Port Talbot Council Biodiversity Duty Plan (2023-2026). Available on-line: <https://www.npt.gov.uk/culture-and-tourism/countryside-and-wildlife/wildlife-law-and-advice/biodiversity-duty-plan/>

NetRegs (undated) Guidance for Pollution Prevention (GPP) documents. [Online] Available at: <https://www.netregs.org.uk/environmental-topics/guidance-for-pollution-prevention-gpp-documents/>

UKHab Ltd (2023) UK Habitat Classification Version 2.0. Available on-line at: <https://www.ukhab.org>

Welsh Government (2021) Future Wales: The National Plan 2040. February 2021.

Welsh Government (2024) Planning Policy Wales. Edition 12. February 2024.

Appendix A – Works Plan



NOTES

- 1. Access road safety rules to be included on CDM sign.
- 2. Vehicle hazard lights and warning beacons must be switched on whilst driving on access road.
- 3. Vehicle speeds must not exceed 10mph.
- 4. 'Beware of Pedestrians' signage to be provided.
- 5. For additional health and safety information refer to construction method statements.
- 6. All CDM areas require agreement with National Grid SAP prior to establishment.
- 7. CDM areas are shown indicatively and may be developed as project progresses.
- 8. All works will be carried out in accordance with National Grid safety rules and procedures.
- 9. Segregated Access route to be provided for pedestrians from amenities to work areas.
- 10. Work areas must be segregated using suitable barriers.
- 11. Temporary earthing during construction to be agreed with National Grid SAP.
- 12. Extra care to be taken outside substation compound to ensure security of materials and equipment which are not to be left unattended. Welsh Government security is limited to road access and the site has a history of incidents involving salvaging and theft of materials.
- 13. Background information based on AutoCAD Bing maps (2020).
- 14. A working width of 3 m has been assumed for installation of underground services.

LEGEND

- CDM Work Area

Car Parking and Laydown Area

Welfare Area

Haulage Access Route

Proposed Access Route

Proposed Equipment

Existing Layout

Substation Access Gate

Electrical Palisade Fence(ISS Specification)
- Items Included Within CDM Area:

Fire Alarm

Fire Extinguisher

Muster Point

Skips

First Aid Facilities

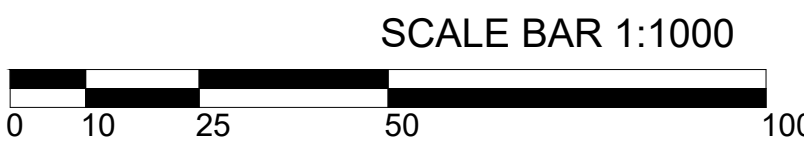
Notice Board - Site Information

Notice Board - CDM Information

REFERENCE DRAWINGS

HAZARD PLAN	PDD-102592-LAY-0201
CIVIL LAYOUT	PDD-102592-LAY-0202
INDICATIVE POTABLE WATER CONNECTION ROUTE PLAN	PDD-102592-LAY-0203

JACOBS
FOR INFORMATION



P01	FIRST ISSUE	GG	NP	HA	01/04/25
P02	ROUTE UPDATED	GG	NP	HA	26/06/26
P03	UPDATED AS PER CLIENT COMMENTS	GG	NP	HA	28/07/26
Rev	Description	Created	Checked	Approved	Date

nationalgrid

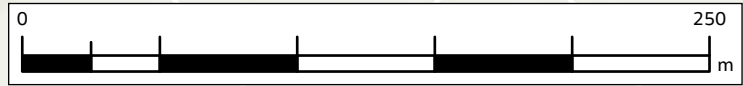
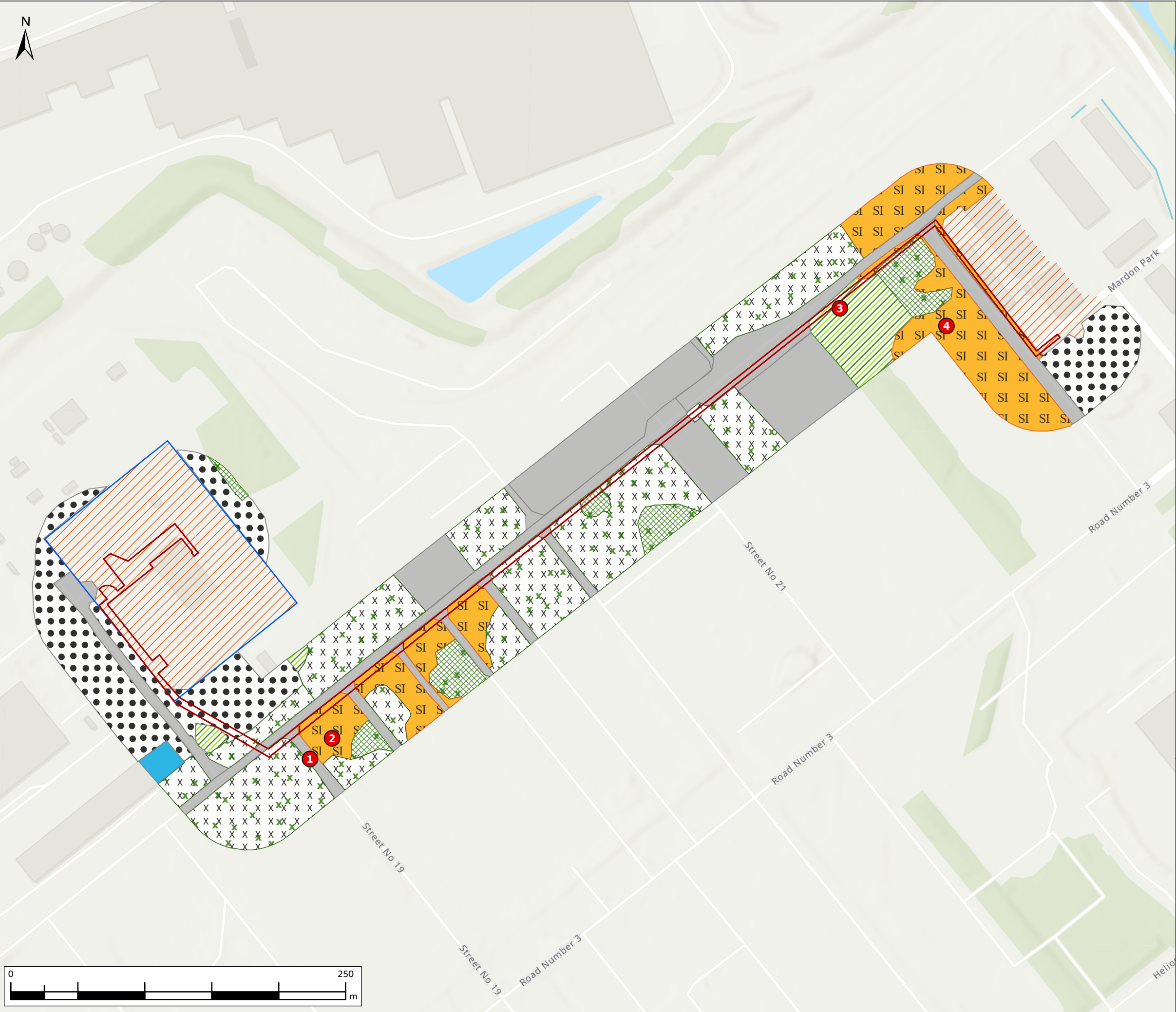
Investment No:	Project No:	Site:
102592	102592	BAGLAN BAY 275KV SUBSTATION
Investment Name:		
BAGLAN BAY SITE SEPARATION		
Document Title:		
CDM PLAN		

Created by:	Date:	Checked by:	Date:	Approved by:	Date:
GG	28/07/26	NP	28/07/26	HA	28/07/26
Development Eng:	Document Type:	Scale:	Format:	Sheet(s):	Rev:
Bing Yang	DWG	1:1000	A0	1	P03

National Grid Drawing Number:
PDD-102592-LAY-0200
Originator Drawing Number:
B2441C36-JAC-14-XX-DR-C-0200

Appendix B- Phase 1 Habitat Survey

Source Ecology Report (Jacobs 2026)



Legend

- CDM Working Area
- NGET leasehold boundary
- No access area
- Target note

Phase 1 Habitat Classification

- A1.3.2 Mixed, plantation woodland
- A2.1 Dense/continuous scrub
- A2.2 Scattered scrub
- B2.2 Semi-improved, neutral grassland
- G1 Standing water
- J1.3 Ephemeral/short perennial
- J3 Built-up areas
- J3.6 Buildings
- J4 Bare ground

Source:
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IP03	30/07/2026	Initial Issue	FL	RT	CD	HA
Rev.	Date	Purpose of revision	Drawn	Check'd	Rev'd	Appr'd

Scale @ A3	Scale: 1:2,750	DO NOT SCALE
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Jacobs No. B2441C36

Jacobs

Client

nationalgrid

Project

Baglan Bay Power Station - Potable Water Connection

Drawing Title

Figure 4 - Phase 1 Habitat Survey

Drawing No. B2441C36_Rev03_BaglanBay	Drawing Status FINAL
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FIGURE 4

Appendix C: Non-statutory designated sites within 2 km

Source: Ecology Report (Jacobs 2026)

Appendix D – Habitats of Principal Importance

Source: Ecology Report (Jacobs 2026)



Legend

- CDM Working Area
- NGET leasehold boundary
- 250m study area

Habitats of Principal Importance

- Saltmarsh
- Open Mosaic Habitats on Previously Developed Land

Source:
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P03	30/07/2026	Initial Issue	FL	RT	CD	HA
Rev.	Date	Purpose of revision	Drawn	Check'd	Rev'd	Appr'd

Scale @ A3: 1:6,000 DO NOT SCALE

Jacobs No. B2441C36

Jacobs

Client

nationalgrid

Project

Baglan Bay Power Station - Potable Water Connection

Drawing Title

Figure 3 - Habitats of Principal Importance

Drawing No. B2441C36_Rev03_BaglanBay	Drawing Status FINAL
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FIGURE 3

Appendix E – Summary of Legislation and Policy

8.1 Legislation

The UK is no longer a member of the European Union (EU). EU legislation as it applied to the UK on 31 December 2020 is now a part of the UK domestic legislation. EU legislation which applied directly or indirectly to the UK before 11.00pm on 31 December 2020 has been retained in UK law as a form of domestic legislation known as 'retained EU legislation'.

The Secretary of State for the Environment, Food and Rural Affairs and Welsh Ministers have made changes to parts of the *Conservation of Habitats and Species Regulations 2017* (referred to as the 2017 Regulations) so that they operate effectively. Most of these changes involve transferring functions from the European Commission to the appropriate authorities in England. All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant.

8.1.1 Designated Sites

A variety of sites are designated in the UK, under Conventions, Directives and Regulations for their nature conservation importance and interest. The general aim of these designations is to conserve and protect ecological resources, as well as raising awareness and understanding. Other non-statutory sites are afforded some protection through local plans. The following outlines the most common statutory and non-statutory designations:

Designation/Habitat	Brief Description
Special Areas of Conservation (SAC)	SACs are sites selected to conserve the natural habitat types and species of wild flora and fauna as stated in the Conservation of Habitats and Species Regulations. They are the best areas to represent the range and variety of habitats and species within the European Union (EU).
Special Protection Area (SPA)	SPAs are strictly protected sites for the most important habitats for rare and migratory birds within the EU.
Ramsar Sites	Ramsar Sites are wetlands of international importance. Ramsar Sites are protected, through the planning system, under the Wildlife and Countryside Act 1981 (as amended), and the Countryside and Rights of Way Act 2000 through their notification as SSSIs and through other regulatory systems addressing water, soil and air quality.
National Nature Reserve (NNR)	NNRs are nationally important areas of wildlife habitat and geological formations in Britain. NNRs are designated and protected under the National Parks and Access to the Countryside Act 1949 and the Wildlife and Countryside Act 1981 (as amended). They receive additional protection under the Countryside and Rights of Way Act 2000. They are managed for the benefit of nature conservation.
Site of Special Scientific Interest (SSSI)	A SSSI is a site of at least national importance for nature conservation designated under the Wildlife and Countryside Act 1981 (as amended) due to its special interest in terms of flora, fauna or geological or physiographical features. Protection afforded to SSSI's was strengthened by the Countryside and Rights of Way Act 2000. It should be noted that under the Countryside and Rights of Way Act 2000 owners of SSSIs must give Natural Resources Wales written notice before they begin any of the operations listed in the notification as likely to damage the special interest features, or if they allow others to carry out these activities. None of the listed operations can be carried out without NRW's consent.
Local Wildlife Sites	Local Wildlife Sites (LWSs) are sites with 'substantive nature conservation value' and include SINCs. They are defined areas, identified and selected for their nature conservation value, based on important, distinctive and threatened habitats and species within a region. They are usually selected by the relevant Wildlife Trust, along with representatives of the local authority and other local wildlife conservation groups. The LWS selection panel select all sites that meet the assigned criteria, unlike SSSIs which for some habitats are a representative sample of sites that meet the national standard. Consequently, many sites of SSSI quality

Designation/Habitat	Brief Description
	are not designated and instead are selected as LWSs. LWSs can therefore be amongst the best sites for biodiversity.
Ancient Woodland Inventory	Ancient Woodland is a term applied to woodlands which have existed from at least Medieval times to the present without ever having been cleared for uses other than wood or timber production. A convenient date used to separate ancient and secondary woodland is about the year 1600. In special circumstances semi-natural woods of post-1600 but pre-1900 origin are also included.
Hedgerows	Under the Hedgerow Regulations 1997, it is against the law to remove or destroy certain hedgerows without permission from the local planning authority. In general, permission will be required before removing hedges that are at least 20 m in length, over 30 years old and contain certain species of plant. The local planning authority will assess the importance of the hedgerow using criteria set out in the regulations.
Wildlife Trust Reserve	These non-statutory sites are managed by the Wildlife Trusts with the purpose of conserving wildlife.
Habitats of Principal Importance for the Conservation of Biodiversity	Section 7 of the Environment (Wales) Act 2016 sets out the duty for public authorities to conserve biodiversity in Wales. Habitats and species of principal importance for the conservation of biodiversity are referred to in Section 7 of the Environment (Wales) Act 2016. The list (as amended 2026) can be found on the Natural Resources Wales website. The list is used as a guide for decision makers such as public bodies, including local and regional authorities, in implementing their duty under Section 7 of the Environment (Wales) Act 2016 to have regard to the conservation of biodiversity in Wales when carrying out their normal functions.

8.1.2 Protected Species

8.1.2.1 Bats

These species, known as European Protected Species, are protected under Regulation 43 of the 2017 Regulations as amended. This makes it an offence to:

- deliberately capture, injure or kill an animal.
- deliberately disturb an animal; or,
- damage or destroy a breeding site or resting place used by an animal.

Deliberate capture or killing is taken to include 'accepting the possibility' of such capture or killing. Deliberate disturbance of animals includes in particular any disturbance which is likely to:

- impair their ability to survive, breed, reproduce or rear or nurture young;
- in the case of animals of hibernating or migratory species, to hibernate or migrate; or,
- significantly affect the local distribution or abundance of the species to which they belong.

Where development works are at risk of causing one or more of the offences listed above, a mitigation licence from Natural Resources Wales can be obtained to facilitate the works that would otherwise be illegal.

These species are also protected under Schedule 5 of the *Wildlife and Countryside Act 1981* (as amended). This makes it an offence to intentionally or recklessly obstruct access to any structure or place used for shelter or protection or disturb an animal in such a place.

Lower levels of disturbance not covered by the *Conservation of Habitats and Species Regulations 2017* (as amended) remain an offence under the *Wildlife and Countryside Act 1981* although a defence is available where such actions are the incidental result of lawful activity that could not reasonably be avoided.

8.1.2.2 Nesting Birds

All wild birds are protected under the *Wildlife and Countryside Act 1981* (as amended), with some species afforded great protection under Schedule 1 of the *Wildlife and Countryside Act 1981* (as amended). In addition to the protection from killing or taking that all birds receive; Schedule 1 birds and their young must not be disturbed at, or in the vicinity of the nest.

There are no licensing purposes that explicitly cover development activities affecting wild birds.

8.1.2.3 Species of Reptile (common lizard, slow worm, grass snake and adder)

Species of reptile are protected against intentional killing and injury under Schedule 5 of the *Wildlife and Countryside Act 1981* (as amended). There is no requirement for a licence where development works affect common species of reptiles. Instead, Natural Resources Wales advise (English Nature, 2004)⁴ that where reptiles are present, they should be protected from any harm that might arise during the development works through appropriate mitigation.

8.1.2.4 Badger

Badgers and their setts are protected under the *Protection of Badgers Act 1992* (as amended). This makes it an offence to:

- wilfully kill, injure or take a badger;
- intentionally or recklessly damage, destroy or obstruct access to a badger sett; or,
- disturb a badger in its sett.

It is not illegal to carry out disturbance activities near setts that are not occupied, *i.e.* those that do not show signs of current use.

Where required, licences for development activities involving disturbance or sett interference or closure are issued by Natural Resources Wales. Licences for activities involving watercourse maintenance, drainage works, or flood defences are issued under a separate process.

When assessing the requirement for a licence in respect of development, Natural Resources Wales state that badgers are relatively tolerant of moderate levels of noise and activity around their setts, and that a low or moderate level of apparent disturbing activity at or near to badger setts does not necessarily disturb the badgers occupying these setts (Natural England, 2009)⁵.

Licences are normally not granted from December to June inclusive (the badger breeding season) because dependent cubs may be present within setts.

8.1.3 Species and Habitats of Principal Importance for the Conservation of Biodiversity

Section 7 of the *Environment (Wales) Act 2016* sets out the duty for public authorities to conserve biodiversity in Wales. Habitats and species of principal importance for the conservation of biodiversity are referred to in Section 7 of the *Environment (Wales) Act 2016*. The list (updated in March 2026) can be found on the Natural Resources Wales website⁶.

The list is used as a guide for decision makers such as public bodies, including local and regional authorities, in implementing their duty under Section 7 of the *Environment (Wales) Act 2016* to have regard to the conservation of biodiversity in Wales when carrying out their normal functions.

8.1.4 Hedgerows

Under the Hedgerow Regulations 1997, it is against the law to remove or destroy certain hedgerows without permission from the local planning authority. In general, permission will be required before removing hedges that are at least 20 m in length, over 30 years old and contain certain species of plant. The local planning authority will assess the importance of the hedgerow using criteria set out in the regulations.

8.1.5 Invasive Non-Native Plant Species

Under the *Wildlife and Countryside Act 1981* (as amended), it is an offence to plant or otherwise cause species listed under Schedule 9 Part II to grow in the wild.

⁴ English Nature (2004) Reptiles: guidelines for developers,

⁵ Natural England (2009) Interpretation of 'Disturbance' in relation to badgers occupying a sett.

⁶ <https://www.biodiversitywales.org.uk/Section-7>

Species listed on Invasive Alien Species of Union concern under the *Invasive Alien Species (Enforcement and Permitting) Order 2019* are subject to restrictions and measures set out in the Regulation. These include restrictions on keeping, importing, selling, breeding, growing and releasing into the environment.

Any contaminated soil or plant material is classified as controlled waste and should be disposed of in a suitably licensed landfill site, accompanied by appropriate Waste Transfer documentation, and must comply with section 34 of the *Environmental Protection Act 1990*.

8.1.6 Environment Act 2021

Two years after it was first introduced in October 2019, the UK Government's Environment Bill received Royal Assent on 9 November 2021. The Bill was introduced to support the Government's overarching vision for leaving the environment in a better state for the next generation, including transposing elements of the UK Government's 25 Year Environment Plan into statute and confirming the UK's approach to environmental governance post-Brexit. Key provisions of what is now the Environment Act 2021 include:

- The creation of a new post-Brexit environmental watchdog (the Office for Environmental Protection).
- Establishing an over-arching scrutiny framework for the environment.
- A new "comply or explain" mandate on deforestation for UK businesses.
- A new direction for resources and waste management.
- The setting of air quality targets including for fine particulate matter.
- A requirement to reduce sewage discharges and forthcoming prohibitions of selected single-use plastic items.

This Act has now been given Royal Assent but is not yet in force at the time of writing this report.

8.2 Planning Policy

8.2.1 Planning Policy Wales, 2024

PPW sets out the land use planning policies of Welsh Government. It is supplemented by a series of TANs, Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.

Chapter 6. Distinctive and Natural Places outlines Welsh Government's objectives for the environmental and cultural components of placemaking. These components are complementary to those of the Active and Social and Productive and Enterprising themes and collectively the three themes come together to contribute towards the national sustainable placemaking outcomes.

The Environment (Wales) Act 2016 Part 1 – Section 6 'Biodiversity and resilience of ecosystems duty' states that public authorities "*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*". Planning Policy Wales (PPW) (Welsh Government, 2024) expands on this by stating that "*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*".

To facilitate the fulfilment of Section 6, a NBB approach has been adopted by the Welsh Government. This approach has been included in the 12th edition of PPW⁷ and sets out the requirement for a Green Infrastructure Statement. Relevant sections of PPW are:

Paragraph 6.2.11: *The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well-being outcomes.*

Paragraph 6.2.12: *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... The green infrastructure statement will be an effective way of demonstrating*

⁷ Welsh Government (2024) Planning Policy Wales. Edition 12. February 2024.

positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (see 'Method of Approach' below) has been applied.

Paragraph 6.2.13: There are multiple ways of incorporating green infrastructure, depending on the needs and opportunities a site presents, and the green infrastructure assessment should be referred to, as appropriate, in order to ascertain local priorities... In most cases the green infrastructure statement should highlight any baseline data considered and surveys and assessments undertaken, including but not limited to, habitats and species surveys, arboricultural surveys and assessments, sustainable drainage statements, landscape and ecological management plans, open space assessments and green space provision and active travel links.

Section 6.4 addresses Biodiversity and Ecological Networks. The policy includes the duties and requirements set out in Section 6 the Environment Wales Act (2016) and pays due regard to the State of Natural Resources Report (Natural Resources Wales (NRW), 2016) by taking all reasonable steps to maintain and enhance biodiversity. There is a focus on ecosystem services and the benefits of protecting and enhancing biodiversity.

The relevant measures in place to conserve landscape and biodiversity include:

- Statutory designations;
- Non-statutory designations;
- Maintaining and enhancing biodiversity;
- Ecosystem resilience and connectivity of ecological networks; and,
- Protection and consideration of protected and notable species and habitats.

Sections relevant to this Green Infrastructure Statement are detailed below.

Paragraph 6.4.5: Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species (not including non-native invasive species), locally or nationally and must work alongside nature and it must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems. A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and long-term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site. The step-wise approach outlined below is the means of demonstrating the steps which have been taken towards securing a net benefit for biodiversity. In doing so, planning authorities must also take account of and promote the resilience of ecosystems, in particular the following attributes, known as the DECCA Framework:

- *diversity between and within ecosystems;*
- *the extent or scale of ecosystems;*
- *the condition of ecosystems including their structure and functioning;*
- *the connections between and within ecosystems; and*
- *adaptability of ecosystems including their ability to adapt to, resist and recover from a range of pressures likely to be placed on them through climate change for example.*

Paragraph 6.4.21: Planning authorities must follow a step- wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimised, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.

Paragraph 6.4.12: Having worked iteratively through the stages of the step-wise approach (see 'Method of Approach' below), and providing evidence in the Green Infrastructure Statement that the step-wise approach has been followed, a scheme of enhancements must be provided to ensure a NBB. Where biodiversity enhancement proportionate to the scale and nature of the development is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise, it will be necessary to refuse permission.

Paragraph 6.4.13: Improving ecosystem resilience, particularly improving connectivity to the immediate surroundings, would be a key contribution to on-site avoidance, minimisation, and mitigation strategies and enhancement. How a development would improve the attributes of resilience should be demonstrated as far as this is reasonably practical.

Paragraph 6.4.20: *Statutorily designated sites must be protected from damage and deterioration, with their important features conserved and enhanced by appropriate management. The contribution of the designated site to wider resilient ecological networks should be recognised and captured as part of a strategic approach to planning policy and decision making. The links between planning and wider management activity for the restoration and recovery of nature should be made. Complementary, and joint, action between all sectors and beyond the boundaries of the designated sites themselves is necessary to improve extent, connectivity and adaptability and address the nature emergency.*

Paragraph 6.4.29: *SACs and SPAs are of European importance. Under the Conservation of Habitats and Species Regulations (2017) (the Habitats Regulations), all public bodies (including planning authorities) must have regard to the requirements of the EC Habitats and Birds Directives when carrying out their functions. SACs and SPAs on land are underpinned by notification as SSSIs and hence subject to protection afforded by the SSSI provisions. Before authorising development or adopting a land use plan which is likely to have a significant effect on a SAC or SPA (including where outside the boundary of the SAC or SPA), planning authorities must carry out an appropriate assessment of the implications for the designated features, consult NRW and have regard to NRW's representations. The development can normally only be authorised, or the plan adopted, if the planning authority ascertains that it will not adversely affect the integrity of the site, if necessary taking into account any additional measures, planning conditions or obligations.*

Paragraph 6.4.31: *Although non-statutory designations do not have a statutory process for their protection, Sites of Importance for Nature Conservation, Local Wildlife Sites, Local Nature Reserves, and Regionally Importance Geodiversity Sites make a vital contribution to delivering an ecological network for biodiversity and resilient ecosystems, and they should be given protection in development plans and the development management process.*

Paragraph 6.4.35: *The presence of a species protected under European or UK legislation, or under Section 7 of the Environment (Wales) Act 2016 is a material consideration when a planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat and to ensure that the range and population of the species is sustained.*

Paragraph 6.4.39: *Planning authorities should protect trees, hedges, groups of trees and areas of woodland where they have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial green infrastructure function.*

Paragraph 6.4.26: *Ancient woodland, semi-natural woodlands, individual ancient, veteran and heritage trees and ancient hedgerows are irreplaceable natural resources, and have significant landscape, biodiversity and cultural value. Such trees, woodlands and hedgerows are to be afforded protection from development which would result in their loss or deterioration unless very exceptionally there are significant and clearly defined public benefits; this protection must prevent potentially damaging operations and their unnecessary loss.*

Paragraph 6.4.44: *the protection and planting of trees and hedges should be delivered, where appropriate, through locally specific strategies and policies, through imposing conditions when granting planning permission, and/or by making Tree Preservation Orders (TPOs).*

8.2.2 Technical Advice Note 5 (TAN5) Nature Conservation and Planning

The PPW is supplemented by a series of TANs. TAN 5 provides guidance on how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It provides advice on areas including the key principles of positive planning for nature conservation, nature conservation in Local Development Plans and development management procedures. It also provides advice on development affecting designated sites and habitats, in addition to protected or habitats and species of principal importance.

Key Principles include that the town and country planning system in Wales should integrate nature conservation into all planning decisions; that the town and country planning system should look for development to provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally and that they should ensure that the UK's international and national obligations for site, species and habitat protection are fully met in all planning decisions.

8.2.3 The National Plan

The National Plan 2024 (Welsh Government, 2021)⁸ sets out Wales' national development framework that details the Welsh Government's twenty-year plan for shaping the growth and development of the country. Relevant to this Green Infrastructure Statement is Policy 9 – Resilient Ecological Networks and Green Infrastructure which is outlined below:

To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

- identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and
- identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.

Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.

8.2.4 Local Planning Policy

8.2.4.1 Local Development Plan

The table below provides a summary of relevant local planning policies found in the Neath Port Talbot County Borough Council Local Development Plan (2011-2026, adopted January 2016). For the precise wording of each specific policy please refer back to the source document (NPT, 2016)⁹.

Planning Policy	Purpose/Relevant Sections
SP 15: Biodiversity and Geodiversity	Biodiversity and Geodiversity Important habitats, species and sites of geological interest will be protected, conserved, enhanced and managed through the following measures: 1. The identification of the following Internationally and Nationally designated sites within the County Borough to enable their protection: (a) Special Areas of Conservation (SACs) and Ramsar Sites; (b) Sites of Special Scientific Interest (SSSIs); (c) National Nature Reserves (NNRs). 2. The identification and protection of sites of regional and local importance; 3. The protection of important natural heritage features. LDP Objective: OB 15
Policy EN 6: Important Biodiversity and Geodiversity Sites	Development proposals that would affect Regionally Important Geodiversity Sites (RIGS), Local Nature Reserves (LNRs), Sites of Interest for Nature Conservation (SINCs), sites meeting SINC criteria or sites supporting Local Biodiversity Action Plan (LBAP) or S42 habitats or species will only be permitted where: 1. They conserve and where possible enhance the natural heritage importance of the site; 2. or 2. The development could not reasonably be located elsewhere, and the benefits of the development outweigh the natural heritage importance of the site. Mitigation and/or compensation measures will need to be agreed where adverse effects are unavoidable.
Policy EN 7: Important Natural Features	Development proposals that would adversely affect ecologically or visually important natural features such as trees, woodlands, hedgerows / field boundaries, watercourses or ponds will only be permitted where: 1. Full account has been taken of the relevant features in the design of the development, with measures put in place to ensure that they are retained and protected wherever possible; 2. or 2. The biodiversity value and role of the relevant feature has been taken into account and where removal is unavoidable, mitigation measures are agreed.
Policy SP 16: Environmental Protection	Air, water and ground quality and the environment generally will be protected and where feasible improved through the following measures: 1. Ensuring that proposals have no significant adverse effects on water, ground or air quality and do not significantly increase pollution levels;

⁸ Welsh Government (2021) Future Wales: The National Plan 2040. February 2021

⁹ NPT (2016) Neath Port Talbot County Borough Council Local Development Plan (2011-2026, adopted January 2016). Available on-line: https://media.npt.gov.uk/media/ca2fbumd/ldp_written_statement_jan16.pdf?v=20240823155047

2. Giving preference to the development of brownfield sites over greenfield sites where appropriate and deliverable;
3. Ensuring that developments do not increase the number of people exposed to significant levels of pollution.

LDP Objectives: OB 2, OB 16 and OB 17

Policy EN 8: Pollution and Land Stability	Proposals which would be likely to have an unacceptable adverse effect on health, biodiversity and/or local amenity or would expose people to unacceptable risk due to the following will not be permitted: ● Air pollution; ● Noise pollution; ● Light pollution; ● Contamination; ● Land instability; ● Water (including groundwater) pollution. Proposals which would create new problems or exacerbate existing problems detailed above will not be acceptable unless mitigation measures are included to reduce the risk of harm to public health, biodiversity and/or local amenity to an acceptable level.
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8.2.4.2 Biodiversity Duty Plan

This Neath Port Talbot Council Biodiversity Duty Plan (2023-2026)¹⁰ demonstrates how Neath Port Talbot (NPT) Borough Council is committed to protecting and enhancing biodiversity and how they will fulfil their legal duty under the Environment (Wales) Act 2016 to help nature in NPT to recover.

The previous Biodiversity Duty Plan for Neath Port Talbot (NPT) was published in December 2020. In this there were targeted actions that would be undertaken by the Council to meet the requirements of the Act. Subsequently, a report on progress against the plan was produced in 2023, for the period from April 2020 to the end of March 2023. This report, titled the Implementation Report (available on the Council's website) highlights the positive work undertaken by NPTC for biodiversity, demonstrating good progress against delivery of the biodiversity and resilience of ecosystems duty. The report also identified changes that should be made to the actions in development of the current, and updated Biodiversity Duty Plan 2023-2026 (BDP 2023-2026). This Plan, covering the period April 2023 to March 2026, sets out how the Council will deliver against its statutory duty for biodiversity, and consequently support global action in reversing the decline in biodiversity.

The Biodiversity Duty Actions of the BDP 2023-2026 set out specifically what the Authority intends to do to meet its legal requirements of the biodiversity and ecosystem resilience duty. Delivery of the Plan will be reported as an Implementation Report every 3 years, in line with the requirements of the Environment Wales Act.

The Nature Recovery Action Plan (NRAP) for Wales is the National Biodiversity Strategy and Action Plan for Wales. The NRAP (as updated 2020-21) aims to reverse the decline in biodiversity, for its intrinsic value, and to ensure lasting benefits to society. The actions in the BDP 2023-2026 demonstrate how they achieve against the objectives of the NRAP.

For specific detail on the actions and objectives in the BDP, refer to the original documents.

¹⁰ Neath Port Talbot Council Biodiversity Duty Plan (2023-2026). Available on-line: <https://www.npt.gov.uk/culture-and-tourism/countryside-and-wildlife/wildlife-law-and-advice/biodiversity-duty-plan/>

