



Y Bryn Wind Farm

Appendix 6.5

Green Infrastructure Statement

Y Bryn Wind Farm Ltd.

22 November 2023

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OUR VISION

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1. Introduction and Approach

Following communication^{1,2} from the Welsh Government, it is noted that there have been updates to Chapter 6 of the Planning Policy Wales 11 (PPW) published with immediate effect and in advance of the publication of PPW12 where these changes will be formalised. These changes in policy are relevant to Chapter 6: Ecology of the Y Bryn Wind Farm Environmental Statement (ES), and as such require to be acknowledged with the submission of the ES.

The changes enacted require the submission of a Green Infrastructure Statement to support every planning application, with the statement to cover how the proposed development will take a proactive approach to green infrastructure. It is required to identify how green infrastructure has been incorporated into the proposal, and to outline the baseline data and assessments that have been undertaken. This Green Infrastructure Statement is therefore being submitted in order to acknowledge and address these changes in relation to Y Bryn Wind Farm hereafter referred to as the 'proposed development'. Information required within the Statement to address the changes includes;

- Considering cross boundary green infrastructure;
- Securing net benefit for biodiversity;
- Strengthening the approach to the protection of Sites of Special Scientific Interest (SSSIs) and potentially other designated and non-designated sites;
- Ensuring the protection of peat resources; and
- Ensuring the protection of trees and woodland.

Having reviewed the detail of these updates, it is our opinion that there are no amendments required to Chapter 6 (ES: Ecology) or Chapter 10 (ES: Hydrology, Geology and Hydrogeology) of the Y Bryn Wind Farm ES to address these changes, as significant consideration has already been given to these aspects during the planning and design stages of the proposed development. However, this Statement has been prepared in order to acknowledge these changes and to satisfy consultees that they have been considered and understood. This Statement will address each change in order to outline whether they are relevant, and where it is considered that they have already been addressed within Y Bryn Wind Farm ES.

1.1. Stepwise Approach to Assessment

A step-wise approach to assessment has been outlined in Figure 1X² of Chapter 6 (PPW).

The step-wise approach outlines that when assessing impacts on habitats and species, the following stages must be undertaken:

- First, the project must avoid any impact;
- If this is not possible then the project must minimise impact;
- If this is not possible then the project must mitigate for the impact or restore any potential damage. This should be by either;
 - Compensation on site in the first instance; or
 - Compensation off site as a last resort.

Each stage of the step-wise approach must be accompanied by a long term management plan. If this approach has not been taken, then the Planning Authority should refuse planning permission.

¹ Letter from Julie James, Minister for Climate Change to Local Authorities – Heads of Planning dated 11 October 2023

² Annex to Heads of Planning Letter Dated 11 October 2023: Addressing the Nature Emergency through the Planning System: Updated National Planning Policy for Chapter 6 of Planning Policy Wales

On review of the step-wise approach, it is our professional opinion that it is in line with the mitigation hierarchy outlined by CIEEM³. As Chapter 6 (ES: Ecology) has been written following these guidelines, we are confident that the step-wise approach has been applied throughout on any potential impacts identified.

2. Pro-active Approach to Green Infrastructure

As outlined within Chapter 6 (ES: Ecology), the land within the proposed development area is comprised of mostly productive forestry, although there are areas of broadleaved and mixed woodland also present. Linear strips of marshy grassland and wet and dry dwarf shrub heath are present primarily along the edge of forest rides or tracks. Many of the open grassland and heath areas, where not managed are being encroached by bracken or bramble scrub. Open habitat present includes neutral and acid grasslands and areas of scrub, particularly on steeper slopes. All habitats present within the site boundary have been assessed in relation to their conservation status and the area and percentage loss predicted as a result of the proposed development. No significant effects on habitats have been predicted.

There will be positive changes to the habitats present as a result of the proposed development, as coniferous plantation will require to be felled to allow infrastructure to be constructed. Within Chapter 6 (ES: Ecology) the habitat loss calculations identified that over 97% of the Phase 1 habitats recorded which contain a National Vegetation Classification (NVC) community with conservation protection will be retained. Included in the prescriptions of the outline Habitat Management Plan (HMP) is the restoration of broadleaved woodland, including wet woodland, in areas that were previously conifer plantation. The areas identified for restoration total over 30 hectares (ha). This compares to a total of 2.22 ha calculated to be lost in the Habitat Loss Calculations (HLC) (broadleaved and mixed woodland of all types combined). Current habitats are provided on Figures 6.6 (Phase 1) and 6.7 (National Vegetation Classification (NVC)), and these positive changes can be clearly seen on Figure 1, Appendix B of the outline HMP.

The restoration of three areas of broadleaved woodland is proposed in order to compensate for the small loss anticipated of this habitat type. The aim is for broadleaved woodland restoration to occur through natural regeneration from the seed sources of existing semi-natural woodland, the success of which would be measured through operational monitoring. If needed, physical planting of broadleaved trees (from local stock) would be carried out to ensure restoration successfully takes place.

Felling of plantation for construction of the wind farm will create open ground, of which a large area will not be replanted, but will be managed to actively prevent the regeneration of conifers allowing grassland and heathland habitats to become established. As identified within the outline HMP, at least 105 ha of open ground habitat will be created, compared to a total of 11.02 ha (all grassland and heathland habitats/mosaics combined (excluding improved grassland)) that will be lost as a result of the proposed development. Furthermore, there are additional areas proposed where bracken control and invasive species removal will be undertaken which will create further areas of improved biodiverse habitats (as shown on Figure 1, Appendix B outline HMP).

The increase in areas of natural habitat (both broadleaved planting and open ground) within a plantation coniferous woodland will result in new and enhanced green infrastructure corridors that will create linkage across similar habitat types both within the site and in the wider environment. These habitats will be managed and maintained throughout the duration of the wind farm.

3. Net Benefit for Biodiversity

Chapter 6 (ES: Ecology) provides details of the baseline ecological conditions within the site boundary and the immediate surrounding environment. The baseline ecological conditions were established through a programme of rigorous ecological field surveys, in addition to a desk-based review to obtain additional relevant ecological data.

The identified habitats and species comprising the baseline were described and assessed within the ES using recognised criteria in accordance with industry guidelines such as those published by the Chartered Institute of Ecology and Environmental Management (CIEEM)³. Following completion of the assessment, an outline HMP was produced to support the planning application (provided as Appendix 6, Section A6.6), in which enhancement measures are provided resulting in an overall net gain for biodiversity as outlined in Section 2.

The outline HMP also includes a requirement for annual reporting and consultation with a steering group on progress which allows changes to be made to the programme if required. Through minimising the loss of existing habitats of conservation interest, whilst also creating new habitats that will be more favourable to a wide range of ecological interests (including habitat valuable to invertebrates, ground flora, reptiles, amphibians and small mammals), the proposed development will result in biodiversity net benefit.

4. Protection of Designated and Non-designated Sites

Within Chapter 6 (PPW), Figure 12² identifies that as well as SSSI, non-statutory Local Wildlife Sites (such as Sites of Interest for Nature Conservation (SINCs)) should also follow the stepwise process to determine that there are no adverse impacts on the features for which the site is designated and on wider ecosystem resilience. As per the changes to Chapter 6 (PPW), it is recognised that non-statutory sites can form the core of a vital network of habitats, play an essential role in protecting, maintaining, connecting and restoring biodiversity and contribute to nature recovery and a net benefit for biodiversity. As stated², non-statutory designations do not preclude appropriate development and any harm should be minimised and offset through compensation measures (which have been designed to ensure no reduction in overall conservation value, and a net benefit for biodiversity secured). The proposed development is not located within any statutory site designated for ecological interests, however one Local Nature Reserve (LNR) (Bryn Tip) is adjacent to the site boundary, located over 500 m from the nearest infrastructure (Figure 6.5; Statutory Designated Sites). The site is hydrologically connected to the proposed development but embedded mitigation to protect and monitor watercourses are considered sufficient to prevent negative effects.

One SINC (Margam Park) was fully assessed within the ES as an Important Ecological Feature (IEF). This site is designated due to its habitats (wood pasture and parkland, ponds, mosaic habitats) and protected mammals (bat species) and is located approximately 1.5 km to the south of the nearest infrastructure (turbine). Given the distance from the proposed development no direct impacts are anticipated to the habitats for which the SINC is classified, and whilst there is potential hydrological connectivity between the proposed development and the SINC, the protection of watercourses is embedded in the project design through good practice and these measures are considered sufficient to prevent negative effects to waterbodies within the SINC. Therefore, it was considered an IEF solely due to bat species as the distance between the SINC and the proposed development is within the average foraging distance of most bat species. Following assessment, no significant impacts were anticipated on bat species, and an outline operational ecological monitoring plan has been submitted with the application. This includes operational monitoring for bat species as well as recommendations for potential mitigation and review of results and methodologies by appropriate consultees. In addition, the aim of the outline HMP is to enhance and restore habitats which will provide connecting benefits for local sites with additional enhancements proposed in order to further benefit the biodiversity as outlined in Sections 2 and 3.

No additional impacts were anticipated on any other designated or non-designated sites as a result of the proposed development.

³ CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.

5. Protection of Peat Resources

The changes to Chapter 6 (PPW) introduce a new paragraph in respect to ensuring the protection of peat resources. As with the Chapter 6 (ES: Ecology), it is our professional opinion that the hydrological assessment has been undertaken following the step-wise approach outlined in Section 1.1 on any potential impacts identified.

As outlined in Chapter 10 (ES: Hydrology, Geology and Hydrogeology), owing to the underlying geology there is a presence of superficial clay, probably derived from bedrock weathering across the site which has resulted in deep peat being defined as present if more than 0.4m deep. The findings of the peat depth surveys undertaken showed that the majority (~87.9%) of recorded depths identified less than 0.3 m peat depth, with an additional 4.5% less than 0.4 m (92.4% total). Areas defined as deep peat (more than 0.4 m deep) accounted for the remaining 7.6%. Results of the peat core surveys are shown in Chapter 10 (ES: Hydrology, Geology and Hydrogeology) Figure 10.4. The areas of deeper peat soils are restricted to the plateau between Nant-y-glo and Nant Sychbant (primarily between T9 and T10), parts of the north slope of Mynydd Margam (primarily around the access track to T16), the plateau around Brynallwyn (north-east of T12), and a small area in the north section south of the main access track for T1 – T5. All other areas of deep peat are localised to the vicinity of small valleys or watercourses. Therefore, following the results of extensive site investigations and peat surveys, the design layout has fully taken this into consideration and has carefully avoided areas of deep peat.

In order to protect sensitive habitats during the construction phase, embedded mitigation outlined within the ES include a pollution prevention plan and measures to control dust outlined within the Construction Environment Management Plan (CEMP) and it is considered that this will prevent negative effects to this habitat as a result of indirect impacts (as outlined in the ES: Section 6.6).

As a result, there is no infrastructure as part of the proposed development located on deep peat and it is considered that peat resources have been sufficiently protected.

6. Protection for Trees, Woodland and Hedgerows

The proposed changes to Chapter 6 (PPW) states that stronger consideration is required to be given to the protection of native Welsh tree species, woodlands and hedgerows.

As outlined within Chapter 6 (ES: Ecology) the majority of woodland to be lost as a result of the proposed development is non-native coniferous plantation habitat, however, four native woodland habitats will have small losses. Approximately 2.2 ha of broadleaved woodland is calculated to be lost which includes:

- 1.21 ha of semi-natural broadleaved woodland (0.90% of total available);
- 0.65 ha of broadleaved woodland plantation habitat (1.51%);
- 0.22 ha of semi-natural mixed woodland (0.13%); and
- 0.14 ha (0.57%) of mixed plantation woodland.

For all of these habitat types there is considerable habitat to be retained within the site boundary as shown by the percentage loss. In addition, within the outline HMP and as clarified in Section 2 of this Statement there are three areas within the boundary of the proposed development where the restoration of at least 30 ha of broadleaved woodland habitats will be undertaken (Figure 1, Appendix B outline HMP).

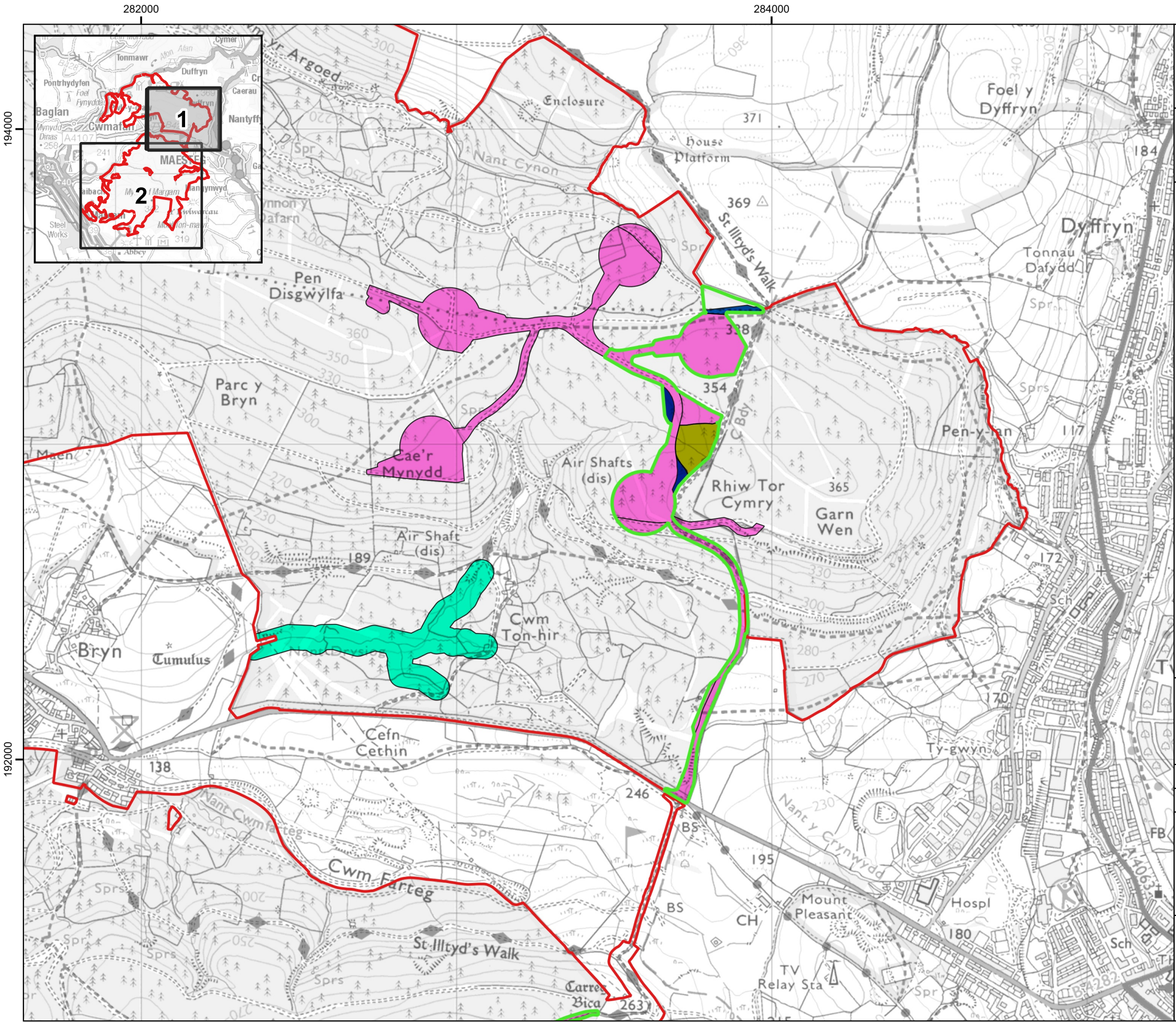
In order to protect the retained native woodlands during the construction phase, embedded mitigation measures outlined within the ES include a pollution prevention plan and measures to control dust and it is considered that this will prevent negative effects to these habitats as a result of indirect impacts (as outlined in the ES: Section 6.6).

As a result, no impacts are anticipated on native tree, woodland and hedgerows during construction or operation of the proposed development, and in fact there will be an overall net gain of native Welsh tree species.

7. Conclusion

To summarise and based on the above information, it is considered that the documents submitted to support the proposed Y Bryn Wind Farm are consistent with the approach outlined in updated national planning policy and guidance position as set out in the Chapter 6 (PPW).

As such and as discussed within this Green Infrastructure Statement, the proposed development is considered to fulfil the objectives outlined in PPW6.



Project:
**Y Bryn Wind Farm, Neath
Port Talbot/Bridgend**

Title:
**Figure 2 Green Infrastructure
Corridors (Page 1 of 2)**

- Key**
- Site boundary
 - Green infrastructure corridor
- Habitat Management Plan (HMP)**
- Broad-leaved woodland restoration area
 - Open ground
 - Pond creation area
 - Permanent open ground
(including areas felled for construction and 10 m
buffer of tracks)

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Scale @ A3: 1:12,000
Coordinate System: British National Grid

0 100 200 300 400 m

N

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