

Contact Cyswllt Matthew Griffiths
Your ref Eich cyf CAS-04421-B8S4Q5
Our ref Ein cyf: P2025/0669

FAO Marloes Holtkamp
Planning Officer
Planning & Environment Decisions Wales
Welsh Government

BY EMAIL ONLY

Dear Marloes,

Project Name: Y Bryn Wind Farm Grid Connection

Site Address: Land Between Bryn Forest and Margam Substation

Proposed Development: Construction of approximately 3-4km of 132 kV (UGC and OHL) and 275 kV (UGC only) cabling; a number of wooden 'H' poles at approximately 100 metres separation; minimum of two steel towers (to cross the motorway); A 132/275 kV Air Insulated Substation (AIS) transformer yard; and associated temporary construction access tracks and working areas.

I write with regards to your letter dated 17th September 2025, which seeks our view on the scope of an Environmental Impact Assessment (EIA) for the above proposed development. Consideration has been given to the information provided in the EIA Scoping Report (SR) and the questions raised therein, together with the relevant regulations and information that the Authority holds. Our advice is set out below in response to the respective sections of the report, the questions raised by the applicant and with reference to Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (EIA Regulations 2017):

Section 1: Introduction

1.1 Background and Context

- The Authority notes and welcomes early scoping. The developer should confirm the red line/"corridor" is indicative and will be refined. In our view the Environment Statement must clearly distinguish between: (a) the assessed "Rochdale envelope" parameters (length, cable types, tower/pole numbers/heights, compound sizes), and (b) the final application boundary and maximum design scenario.
- The description within the introduction currently mixes assumed "double wooden poles" and "at least two steel towers." For the EIA to be robust, it must fix upper limits for: number and maximum height of towers; maximum span over the M4/A48; maximum pole height and spacing; largest temporary work areas; and the largest transformer yard footprint and lighting columns.

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We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.
Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni.

- There are clear interfaces with other development. The scheme is inter-dependent with (i) the Y Bryn Development of National Significance (DNS) on-site substation and (ii) National Grid Energy Transmission (NGET) Margam GSP upgrade¹. The ES should set out clearly which elements are in this application, which are committed cumulative, and any dependencies/consents needed from third parties (e.g. NGET planning permission and construction windows).
- We note the Applicant's expectation that the project will be a Significant Infrastructure Project (SIP). If the application route changes, in our view the ES and Pre-Application Consultation (PAC) approach will need to be updated accordingly. In our view it is clear that the ES should be prepared to SIP standards (one-stop-shop for consent) and clearly identify any secondary consents still required.
- The broad access strategy set out in the introduction is noted. A Construction Traffic Management Plan (CTMP) will be required, including HGV routeing to/from J38, use of the A48/Harbour Way, and management at Cefn Gwrgan Road/private substation road. The CTMP should include swept paths for the largest anticipated vehicles, management of peak flows, banksman needs, and controls for school/shift-change peaks.
- The M4 and A48 are part of the Welsh Government trunk road network (managed via South Wales Trunk Road Agent (SWTRA)). In our view, early agreement with SWTRA on overhead crossing methodology, safety envelope, protection/possession windows and any abnormal load movements is essential and should be outlined in the ES/CTMP.
- The introduction contains a construction programme. The ES should provide a detailed construction programme stating assumed construction duration and phasing for: forestry, Under Ground Cable (UGC) works, pole setting, tower erection, motorway crossing, transformer yard build, and commissioning and provide a realistic worst-case overlap for assessment.

1.2 The Applicant

- No specific Local Planning Authority (LPA) comments.

1.3 Purpose of this Scoping Report

- The approach to focus on receptors with potential significant effects is supported, but any proposed scope-outs must be explicitly justified against the design envelope. Where questions are asked of consultees, it is our view that the Applicant should set out their proposed position to allow clear agreement/disagreement, this is not the approach taken on all questions raised in the SR.

1.4 Technical Expertise

- We are in agreement that the competencies are appropriate. However, it would be beneficial for the applicant to have confirmed that a chartered landscape architect will lead LVIA and that relevant specialists such as the ECoW will be appropriately qualified. The ES should identify the lead author and QA reviewer for each chapter.

¹ The NGET GSP upgrade is intended to be submitted under the Town and Country Planning Act 1990, the project is currently (21.10.2025) at the pre-application consultation and details are available here:

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/margam-substation>. The Authority has screened this project as not being "EIA Development" under screening reference P2025/0309. Details of which are available on the Authority's website: <https://planningonline.npt.gov.uk/online-applications/>.

Section 2: Approach to EIA

2.1–2.2 General approach and topics

- Methodology is generally acceptable. The ES should ensure:
 - Clear definition of receptors, sensitivity/value, magnitude, and significance per topic, with topic-specific matrices (and any exceptions)
 - A transparent list of embedded vs additional mitigation (see 2.5 below) and a secured Schedule of Commitments.
 - Assessment of construction, operation (50 years) and a proportionate decommissioning framework (see our comment under 4.4).

2.3 Baseline data

- The Authority support ongoing surveys, the ES should:
 - Justify cut-off dates, update mechanisms, and how evolving baselines (e.g. forestry cycles, traffic growth, climate) are handled.
 - The Authority agrees that the ES must record access limitations and how gaps/uncertainty are addressed. This must include a precautionary approach with conservative assumptions.

2.4 Impact/effects evaluation

- What is provided here is generally acceptable to the Authority. The evaluation should ensure cable maintenance/replacement interventions are included in operational assessments (traffic, noise, ecology, electromagnetic fields (EMF), etc.).

2.5 Mitigation hierarchy

- This is supported by the Authority. The ES should provide a list of mitigation distinguishing: (i) design-embedded; (ii) standard/best practice; (iii) additional topic-specific measures; (iv) monitoring/adaptive management triggers. The ES should commit to a Construction Environmental Management Plan (CEMP) and other mitigation detailed within topics below.

2.6 Securing commitments

- This is supported. Within the ES we would expect that each mitigation measure is explicitly linked to a securing mechanism (planning condition, other legislative requirement, legal agreement) and to a responsible party.

2.7 Cumulative effects

- The Authority agrees that what is provided is a workable framework, but we request:
 - Topic-specific zones of influence (e.g, LVIA wider than 2km; traffic on the agreed highway network; ecological functionally linked land where relevant).
 - Inclusion of: Y Bryn Wind Farm (DNS), Margam GSP upgrade (NGET), Port Talbot steelworks EAF project and associated grid works, any local solar/storage (including Port Talbot Solar Limited (NPT Scoping Opinion P2025/0699)), employment development at Junction 38 and relevant NRW forestry operations.
 - A living cumulative schedule should be agreed with the LPA ~1 month pre-submission (as per paragraph 2.7.9).

2.8 ES structure

- The proposed structure is acceptable.

Responses to the Applicant's Consultation Questions (Questions 2.1 – 2.3)

- **Q2.1 Approach to EIA and pre-mitigation:** Yes, our view is that treating standard good practice as pre-mitigation is acceptable if wholly embedded/committed and realistically deliverable; otherwise in our view it should be considered as additional mitigation.
- **Q2.2 Proposed chapters:** Yes, the proposed chapter list is generally appropriate. The ES in our view needs to consider Flood Risk & Water Environment explicitly, and a short Land Use & potentially an agriculture section (BMV and land/field drainage) - these are not necessarily included in the chapters identified.
- **Q2.3 Cumulative assessment:** The Authority broadly agrees - subject to the use of topic-specific zone's of Influence and inclusion of the schemes listed above.

Section 3: Consultation

3.1 Community Consultation

- The proposed PAC approach is noted. The developer should ensure public materials clearly explain the corridor envelope, motorway crossing options, and typical tower/pole appearance/heights, with visualisations from representative viewpoints.

3.2 Other Stakeholder Consultation

- The ES should evidence engagement (and ensure that it is on going through the EIA) including organisations such as: Natural Resources Wales (NRW), Welsh Government Transport Directorate / SWTRA, NGET/NGED, Dŵr Cymru/Welsh Water, Cadw, Heneb, Welsh Government, Woodland Trust (Graig Fawr), Local Access Forum/Public Rights of Way (PROW) team, and the Authority's SAB (SuDS Approval Body).

Section 4: Project Description

4.1 Design process

- The staged FEED/design evolution is appropriate. The Authority would welcome clear commitment to design principles for the development (this could include UGC in existing track margins, avoidance of ancient woodland and veteran trees with buffers, minimising skylineing of Overhead Lines (OHL) near sensitive receptors).

4.2 Scoping area description

- The Authority notes the description and welcomes the provided plan. The constraints plan should show development overlaid with PROW, designated sites, watercourses/ordinary watercourses, flood zones, SLA/Registered Historic Landscape/Registered Park & Garden extents, BMV land, and forestry compartments/timescales.

4.3 Components of the Proposed Development

- The ES in our view must fix the maximum scale of each element for assessment (see 1.1).
- In respect to the transformer yard the ES should clarify AIS layout, maximum platform area/levels, perimeter fencing type/height/finish, acoustic enclosures, bunds, oil containment/SuDS features, switchgear transformers (number, MVA rating), and lighting (column heights, lux limits, hours of operation).
- In respect to the overhead lines, the ES should confirm conductor type, insulator sets, typical span, and maximum pole/tower heights. There should be a clear commitment in the ES to finalising finishes to reduce visual prominence.

4.4 Decommissioning

We do not support fully scoping out decommissioning. A proportionate Decommissioning & Restoration Framework should be included (e.g. covering methods assumptions, access, waste, reinstatement), to be secured by condition, recognising baseline uncertainty.

Section 5: Design Evolution and Alternatives

- In the Authority's view the case for a single corridor is not yet sufficiently evidenced within the Applicant's SR. The ES should include a proportionate Alternatives chapter that demonstrates:
 - Consideration of routeing options (micro-variations within the corridor and reasonable near-corridor alternatives),
 - Consideration of technology alternatives (e.g. further undergrounding extent; alternative motorway crossing methods/alignments),
 - Clear reasons for choices balancing environmental effects, deliverability, safety, and cost (the developed option in our view should be consistent with PPW para 5.7.9 on undergrounding preference where feasible).
 - Consideration of substation options and justification of the use of an Air Insulated Substation (AIS), including consideration of the resulting footprint and visual appearance of any alternatives.
- The ES should include design-led mitigation iterations (such as tower placement/silhouetting, avoiding key skylines, hedgerow gap minimisation, riparian buffers).

Section 6: Legislation and Policy Context

- The Authority is largely in agreement with this section and note the following:
 - The applicant should confirm compliance with ICNIRP public exposure guidelines for EMF and present isopleth plans for worst-case.
 - Confirm requirement for SAB approval (Schedule 3, Flood and Water Management Act 2010) for any construction areas exceeding thresholds.
 - Identify the need for Ordinary Watercourse Consents (LLFA) and any Flood Risk Activity Permits with NRW for main rivers, as relevant.

Question 6.1: Do consultees agree with the list of relevant policies?

The Authority is broadly in agreement, but would comment that a discussion of policy should additionally focus on the following:

- The Well-being of Future Generations (Wales) Act 2015 is identified - in our view a discussion of its objectives in the planning balance should be included in the ES;
- PPW green infrastructure and nature recovery principles are likely to be significant considerations that should be discussed further in the ES;
- TAN15 (Development, Flooding and Coastal Erosion), this is likely to be very pertinent to the EIA due to the location of parts of the scoping area in the flood risk zones 2 and 3, the policy context should be detailed;
- SuDS Statutory Standards (Wales) should be referenced;
- Air Quality Management Areas (AQMAS) are considerations in and around Port Talbot. This legislation is relevant as development may need to be screened and assessed against any relevant AQMAS.

Section 7: Ecology

7.1 Introduction

- This provides an acceptable overview of baseline conditions and relevant designations. However, the ES must in our view:
 - Clearly define the final ecological study area, including buffers used for each species and habitat type, and justify them based on current guidance and project scale.
 - Explicitly acknowledge that the grid connection corridor may evolve, and confirm that the assessment will encompass a “Rochdale envelope” of maximum foreseeable land-take, tree loss, and disturbance extents to ensure coverage of all likely impacts.
 - Provide cross-reference to the Y Bryn Wind Farm DNS ecological baseline, explaining how shared survey data will be integrated and where additional work will fill gaps.

7.2 Legislation and Guidance

- The legislation and policy list is comprehensive and appropriate.

7.3 Existing Conditions

- Survey Area and Desk Study
 - The use of a 250m buffer for general habitats is appropriate, but for mobile species (bats, otter, badger, birds) larger buffers should be used where ecological connectivity justifies it (e.g. 500m for bat foraging corridors, 1km for badgers and otters along watercourses).
 - The ES should include all statutory and non-statutory sites, including Sites of Importance for Nature Conservation (SINCs) and Section 7 habitats, regardless of designation distance, where functional connectivity exists.
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- Designated and Local Sites
 - The presence of Graig Fawr Ancient Woodland, within and adjacent to the corridor, is of significant concern. Ancient woodland and veteran trees are irreplaceable habitats under PPW 12 (para 6.4.26). The ES must demonstrate that all such features will be avoided where possible, with minimum 15m buffer zones from works, and justification where impacts are unavoidable.
 - The route intersects NRW-managed woodland and Woodland Trust holdings, the Authority would expect a clear commitment to early engagement on access, felling and reinstatement.
 - For Margam Moors SSSI, although 0.77km distant, indirect effects (pollution, hydrological change, disturbance) should be screened in unless the hydrological pathway is proven absent.
- Phase 1 Habitats
 - The Extended Phase 1 survey provides a useful baseline.
 - The ES should identify priority habitat extent and connectivity (Section 7 habitats and Annex I types), including marshy grassland potentially functioning as Ground Water Dependent Terrestrial Ecosystems (GWDTE), and outline how NVC data will determine their status and sensitivity.
- The supporting Phase 1 assessment contains an un-surveyed area adjacent to the Margam Substation, this in the view of the Local Planning Authority is a critical gap in the SR.
 - The SR acknowledges access constraints west/south-west of the M4 near Margam Substation. The NGET's Margam GSP upgrade project is currently at the Pre

Application Consultation (PAC) stage prior to submission to the Authority (<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/margam-substation>). The GSP upgrade application is supported by an Ecological Impact Assessment (EclA). This document identifies that:

- Baseline mapping (NVC and UKHab) identifies swamp and neutral grassland mosaics immediately adjacent to the substation boundary, with hydrological connectivity via surface drains and groundwater flow to the Margam Moors SSSI catchment.
- The area also supports otter activity, marshy grassland indicator species, and potential water vole habitat.
- NRW guidance recognises these wetland habitats as irreplaceable or highly constrained due to their hydrological dependence.
- Survey Requirement and Data Gap
 - The un-surveyed parcel adjacent to Margam Substation represents a significant ecological constraint.
 - The Authority considers that the absence of field data here results in a critical gap in the baseline and cannot be deferred to post-consent.
 - For the ES to be robust, it must therefore complete full access and survey coverage of this area before submission, including Phase 1/NVC mapping, GWDTE assessment, and hydrological linkage analysis.
 - Where access cannot be obtained, the ES must adopt a precautionary approach and treat the area as supporting high-sensitivity wetland features, consistent with the GSP EclA findings.
- Hydrological and Functional Connectivity
 - The Margam GSP EclA demonstrates functional hydrological continuity between these wetlands and Margam Moors SSSI.
 - The grid connection ES must therefore include this area within its Zone of Influence for hydrological, drainage, and pollution impacts, and assess both direct and indirect effects on the SSSI and associated GWDTEs.
 - The EIA should be supported by hydrological modelling and water quality risk assessment, including if necessary, HDD drilling fluid breakout risk, sediment transport, and groundwater drawdown.
- Ecological Sensitivity and Mitigation Hierarchy
 - These wetlands should be treated as Important Ecological Features (County importance or higher).
 - The ES must demonstrate that avoidance of these habitats has been prioritised through routing and compound siting.
 - Where avoidance is not possible, effects must be clearly quantified, and irreplaceable habitat loss explicitly recognised - wetland creation or translocation should not be relied upon as compensation.
 - Construction buffers of at least 20m from mapped wetland edges and 8m from ditches/watercourses are expected, with site-specific pollution control and hydrological safeguards detailed within an Outline CEMP.
- Species and Habitat Considerations
 - Surveys must address otter, water vole, amphibians, and marshland breeding birds, which are confirmed to occur near the substation per GSP data.
 - The ES should also include an Invasive Non-Native Species (INNS) survey and Biosecurity Plan, as invasive flora (notably *Rhododendron ponticum* and Japanese knotweed) are recorded nearby.

- Given the habitat type and connectivity, potential GCN presence should remain in scope until ruled out by updated surveys.
- Cumulative Assessment
 - The Margam GSP, Y Bryn Wind Farm, and Grid Connection projects are spatially and temporally linked. The ES must provide a cumulative ecological assessment of all three, especially regarding wetland hydrology, drainage discharge, and access/compound impacts near Margam Substation.
- The ES should include:
 - An updated Phase 1/NVC habitat map incorporating the wetland area.
 - A Wetland Protection and Monitoring Plan, including water-level monitoring and adaptive mitigation triggers.
 - A Biodiversity Enhancement Plan demonstrating measurable Net Benefit for Biodiversity with particular emphasis on wetland resilience and connectivity to Margam Moors SSSI.
- Our view to PEDW for the Scoping Direction:
 - This area must remain within the scope of the EIA.
 - Full surveys and/or a precautionary high-sensitivity assessment are required.
 - The ES should treat the wetland as an Important Ecological Feature and apply the avoid–mitigate–compensate hierarchy with clear avoidance-led design.
- The view of the Authority is that this a critical ecological constraint. Access limitations do not remove the obligation to assess and avoid harm. The project should be designed on the assumption of high-sensitivity wetland features until comprehensive surveys prove otherwise. This is also in line with the Authority’s handling of the screening for the Margam GSP upgrade development.

7.4 Proposed Surveys and Assessment Methodologies

- The proposed suite of surveys is broadly appropriate, but several additional surveys and clarifications are required in the Authority’s view:
 - Bat activity and crossing surveys: The presence of woodland edges and the motorway corridor creates potential bat commuting routes. Given the proximity to Margam Country Park and the Authority’s ecologist’s knowledge of bats in the area of J38 - there may need to do further assessments to characterise site usage by bats. All work must be in accordance with BCT (2023) guidelines. There will need to be Night-time Bat Walkovers, static detector deployments and Ground Level Tree Assessments which could lead to further surveys of trees with potential roost features.
 - Bat roost potential: Clarify that all mature trees and buildings within 50m of working areas will be assessed, and that any moderate/high potential trees will undergo surveys.
 - Badger: Extend the 150m buffer of the scoping boundary to at least 250m around all works to capture foraging and commuting routes.
 - Otter and water vole: Ensure surveys cover all hydrologically linked ditches, including those potentially affected by construction drainage.
 - Invasive Non-Native Species (INNS): Map and record invasive flora (e.g. Japanese knotweed, Himalayan balsam, rhododendron) and prepare a Biosecurity Plan.
 - Ancient/veteran trees: Include arboricultural survey data identifying potential veteran trees and root protection zones.
- Methodological Clarifications
 - Confirm that all ecological surveys will follow current CIEEM guidelines and be undertaken by appropriately licensed surveyors.

- Ensure survey timings align with optimal seasons and that any data more than two years old are verified through update checks prior to submission.
- For GWDTE assessment, describe how hydrological connectivity to surface/groundwater systems will be determined, including winter NVC survey if necessary.

7.5 Approach to Mitigation

• The proposed embedded measures are welcomed, but the ES must in our view move beyond generic “planning condition” text. A detailed Outline Construction Environmental Management Plan (CEMP) should accompany the ES, setting out:

- Species-specific method statements (bats, otter, badger, nesting birds).
- Pollution prevention and spill contingency measures in line with NRW GPPs.
- Ecological Clerk of Works (ECoW) remit and reporting protocols.
- Biosecurity and INNS management.
- Soil and habitat reinstatement measures.

• Mitigation should follow the IEMA/ISEP Mitigation Hierarchy (avoid → reduce → restore → offset). Priority must be given to avoidance of ancient woodland, riparian habitats and Section 7 habitats.

• The commitment to Net Benefit for Biodiversity (NBB) is supported. The ES should include a clear Biodiversity Enhancement Plan, setting out measurable habitat improvements (e.g. new hedgerow planting, woodland edge diversification, wetland enhancement) and how these will be monitored and maintained post-construction.

7.6 Potential Significant Effects

• The receptors listed in Table 7.4 remain appropriate; however, potential impacts on Groundwater Dependent Terrestrial Ecosystems (GWDTEs), wetland habitats (including swamp and neutral grassland), and Invasive Non-Native Species (INNS) must be explicitly included within the scope of assessment.

• Recent baseline information in the public domain from the Margam GSP EcIA confirms the presence of swamp, marshy grassland and neutral grassland mosaics with hydrological connectivity to Margam Moors SSSI in the area to the west of the M4 near the substation. These habitats are high sensitivity receptors and potentially irreplaceable; the ES must treat them as Important Ecological Features and fully assess potential direct and indirect effects.

• The ES should consider hydrological and water quality impacts on these wetlands and connected drainage features, including potential effects from trenching, any HDD operations, compound siting, and construction drainage.

• Indirect impacts such as noise, vibration, lighting, sedimentation, dust, and air pollution from construction traffic, as well as barrier effects for commuting bats and otters, must be assessed alongside direct habitat loss.

• Cumulative effects with the Y Bryn Wind Farm, Margam GSP upgrade, Port Talbot steelworks EAF and Port Talbot Solar Limited (NPT Scoping Opinion P2025/0699) project must be explicitly assessed. These projects share geographic proximity, workforce access routes, and drainage catchments, and could exert combined pressure on sensitive wetland and riparian systems.

- The ES should include a Wetland Protection and Monitoring Plan and commit to an avoidance-led design around these areas, supported by water-level monitoring and adaptive management triggers.

7.7 Impacts Scoped Out

- The rationale for scoping out dormouse, reptiles, and amphibians is noted; however, this requires confirmation through updated Phase 1/NVC data and local records. Given proximity to woodland and hedgerow corridors, dormouse should not be fully scoped out until verified through targeted surveys.
- Invertebrates should not be excluded entirely. Marshy grassland, woodland edge, and bracken habitats may support notable or Section 7 species. A qualitative assessment should be retained unless future surveys provide robust justification for exclusion.
- Margam Moors SSSI, the adjacent wetland complex near the Margam Substation, and associated GWDTEs must remain in scope for assessment of indirect hydrological, drainage, and pollution effects, even though these areas lie partially outside the red line boundary. These features are functionally connected to the development area and are known to be ecologically sensitive.
- The absence of field survey data west of the M4 introduces uncertainty; therefore, the ES must adopt a precautionary approach and treat this area as high sensitivity until full surveys confirm otherwise

7.8 Conclusion

- The Authority is supportive of the iterative approach, provided outstanding survey coverage is secured and scope-outs are revisited where additional data indicate potential connectivity or sensitivity. Provided that:
 - Full ecological survey coverage is secured, including the previously unsurveyed land near the Margam Substation;
 - Additional baseline information on wetland and GWDTE habitats is incorporated into the assessment; and
 - Scope-outs are revisited where new data (including from the Margam GSP EcIA) indicate potential ecological connectivity or elevated sensitivity.

The Authority is concerned that without the ES addressing these issues it will not be a robust and legally defensible assessment of ecological effects.

Responses to the Applicant's Consultation Questions (Questions 7.1 – 7.3)

- **Q7.1 EIA focus on receptors which maybe subject to significant effects:** The Authority agrees that the ES should focus on receptors likely to experience significant effects, but stresses that significance must be judged with adequate baseline data and conservative assumptions where access limitations remain.
- **Q7.2 Survey Effort:** At present, the proposed survey effort is not yet sufficient. Additional surveys are required for bats, INNS, and confirmation of dormouse absence. Access issues must be resolved to ensure data completeness.
- **Q7.3 Agreement with list of receptors:** The listed receptors are appropriate but should be expanded to include INNS, and GWDTEs, and retain Margam Moors SSSI for indirect effects.

Section 8: Ornithology

General Observations

- NPTCBC welcomes the inclusion of ornithological surveys and acknowledges that the developer has undertaken vantage point (VP), breeding bird, raptor, and nightjar surveys to inform the baseline. However, it is noted that the current survey programme is limited to the breeding season (May–August 2025), with non-breeding VP surveys still proposed. The Authority considers that further clarification and, where necessary, supplementary survey effort will be required to ensure a robust year-round baseline.
- The ornithological assessment area intersects a complex mosaic of habitats, including forestry, open ground, and farmland, and lies close to key features such as Eglwys Nunydd Reservoir SSSI. Given the site's proximity to this designated site and its known importance for wintering wildfowl, the proposed approach must ensure that potential functional linkages (e.g. feeding or commuting movements) are adequately assessed.
- Wetland mosaic east of the M4 adjoining the substation: As per other sections, the unsurveyed area by the substation comprises a wetland mosaic (e.g. flushes, marshy grassland, drains/ditches, small ponds/scrapes, wet woodland/reed-fringe). This materially increases the likelihood of wetland-associated breeding and non-breeding birds using land within or adjacent to the cable route, transformer yard and construction working widths. The ES baseline must therefore explicitly characterise this area and cannot rely on line-of-sight observations from public rights of way alone.

Specific Comments:

- Survey Effort and Methodology
 - VP Surveys:
 - The vantage point surveys commenced only in May 2025, missing key early breeding season months (March–April). Although the developer states additional hours were added in May, this cannot fully substitute for early-season coverage, particularly for species such as curlew, red kite, goshawk, and early-nesting raptors. The Authority advises that this should be clearly acknowledged as a limitation within the ES and, if necessary, that the results are treated as indicative rather than comprehensive.
 - The proposed continuation of VP surveys through the non-breeding period (September–February) is supported, but the Authority requests confirmation that these will cover dawn and dusk periods and poor weather conditions, which can significantly influence bird movements.
 - VP Surveys should cover a full two year period.
 - The Authority is concerned that vantage point 2 used in the VP survey is in a lowland area and we question how the visibility could be as wide as suggested in the VP survey.
 - Spatial Coverage:
 - The initial BBS and raptor survey buffers were based on an earlier indicative grid route, differing from the current alignment. While the applicant considers this not significant, the Authority recommends that the final survey area fully corresponds to the submitted grid route, ensuring no gaps in baseline data for habitats adjacent to sensitive receptors.

- It should be confirmed that access constraints east of the M4 did not materially reduce data quality, particularly as this area lies close to open farmland that may be utilised by foraging raptors and gulls.
- Complete coverage of wetland mosaic: The Authority requires targeted wetland bird surveys for the wetland mosaic adjacent to the Margam Substation, aligned to the final cable alignment and all temporary works (compounds, access tracks, watercourse crossings).
- Access constraints: Where land access remains constrained, deploy viewing platforms, vantage lines, and thermal/infrared as appropriate, and document limitations transparently. If gaps persist, adopt a precautionary approach in the ES.
- Nightjar:
 - The identification of a breeding nightjar territory within NRW-managed forestry is notable. This species is of Amber/Section 7 conservation concern, and given its proximity (c.100m north of the route), the Authority expects the ES to include a species-specific assessment of potential disturbance (noise, lighting, and visual intrusion) during construction.
 - The scope of the assessment should also consider the potential for multiple territories or foraging areas extending beyond the immediate survey buffer.

• Designated Sites

- Although no SPAs or Ramsar sites fall within 10km, the Eglwys Nunydd Reservoir SSSI lies only 0.5km south of the grid route and supports important wintering bird assemblages. Given the proximity of the wetland mosaic within the unsurveyed area to the route and to Eglwys Nunydd Reservoir SSSI (~0.5–0.6km), the ES should assess functional linkage (e.g. commuting/loafing by gulls and off-site foraging/roost movements by wildfowl/waders). The SSSI should remain in scope for indirect effects (noise/lighting during works, hydrological changes from trenching/dewatering, and temporary disturbance increasing flight activity/collision exposure).
- Cumulative assessment should also reflect other grid or wind farm-related infrastructure in the vicinity that could contribute to incremental disturbance to birds associated with this SSSI.

• Species Scoped Out

- The Authority considers it premature to screen out bird species (table 8.10) where surveys are incomplete.
- Based on available information the Authority queries the proposal to scope out species such as red kite, goshawk, kestrel, and passerines of conservation concern, given:
 - The presence of suitable breeding and foraging habitats along the route (forestry margins, open ground, and farmland).
 - The recorded flight activity, albeit low, which may underrepresent true usage due to the limited survey period.
 - The potential for construction disturbance, particularly to ground-nesting and woodland-edge species.

Consequently, the Authority recommends that these species be retained in scope for at least qualitative assessment within the ES, supported by pre-construction checks and mitigation proposals.

• Cumulative Assessment

- The Authority supports the proposed 10km cumulative study area, but requests that the cumulative assessment includes:

- The Y Bryn Wind Farm itself (as a connected project),
- Any other energy infrastructure (such as substations or overhead line proposals), and
- Other major developments within the Port Talbot hinterland that may have shared ornithological receptors. Including Port Talbot Solar Limited (NPT Scoping Opinion P2025/0699).

The methodology for cumulative assessment should be consistent with NatureScot and NRW guidance on cumulative effects for birds associated with wind and grid developments.

• Mitigation and Monitoring

- The embedded mitigation proposals are broadly appropriate, but the authority advises that:
 - The Construction Environmental Management Plan (CEMP) should include a species protection protocol for all breeding birds, with clear timing restrictions and buffers for active nests.
 - Post-construction monitoring proposals should be outlined to validate the effectiveness of mitigation and to detect any unforeseen disturbance effects.
 - The proposed Environmental Clerk of Works (ECoW) role is welcomed, but the Authority requests that this function includes the authority to halt works where unanticipated ornithological sensitivities are encountered.
 - Method statements for wetlands: The CEMP must include wetland-specific RAMS, including seasonal timing restrictions, buffer zones to wet features (e.g. ≥50 m for general breeding birds; ≥100–300 m where notable species/colonies occur), noise and lighting controls (low-spill, directional, no sky glow), and sediment/pollution control to prevent hydrological impacts on wet features.
 - Crossings & dewatering: Provide a Hydro-ecology Method Statement for trenching, pumped water discharge, and any temporary dam/diversion, showing how water levels/quality in wetland habitats will be maintained.
 - Monitoring: Commit to construction-phase clerk-of-works checks of wetland features (including nocturnal spot checks in breeding season) and post-construction one-year winter and breeding reviews to validate outcomes and trigger adaptive management if adverse effects are detected.

Responses to the Applicant's Consultation Questions (Questions 8.1 – 8.3)

Q8.1 Survey effort: The Authority is not fully satisfied that the completed and proposed survey effort provides a comprehensive baseline. Additional coverage is required for the early breeding season (March–April) and for areas with limited access. Non-breeding surveys are supported but must include dawn/dusk coverage. VP Surveys should cover two years.

Q8.2 concentrating on those receptors which may be subject to significant effects: The Authority agrees in principle that the EIA should focus on receptors likely to experience significant effects, but cautions that some species proposed for scoping out (notably red kite, kestrel, goshawk, and passerines) warrant at least qualitative assessment due to their conservation status and habitat suitability.

Q8.3 Agreement with receptor list: The Authority recommends retaining Eglwys Nunydd Reservoir SSSI, nightjar, and key raptor species within the scope of assessment, given potential indirect and cumulative effects. It is premature to scope out the SSSI or raptor species prior to completion of winter and pre-construction surveys.

Section 9: Geology, Hydrology, Hydrogeology & Soils

- Study area / buffers
 - A fixed 2km buffer is acceptable for initial screening of designated sites and PWS, but the assessment should ultimately be catchment-based where hydrological/hydrogeological pathways extend more than 2km (e.g. ditch networks, Heavily Modified Water Bodies (HMWBs), culvert chains, or groundwater flow in Coal Measures).
 - The application should be supported by clear drainage plans confirming ditch flow directions and outfalls in the low-lying western area; desktop conclusions should be validated by field walkovers/levels.
- Contaminated land
 - The Authority does not agree with scoping out contaminated land at this stage. The western corridor (industrial setting, artificial ground, historic mining) warrants at least a Phase 1 Preliminary Risk Assessment (desk study) with site walkover and consultation with NPTCBC Environmental Health. Within the scope of the ES should be a targeted Phase 2 assessment if credible pollutant linkages are identified. Construction excavations, dewatering and watercourse works could mobilise contaminants.
- Coal mining legacy & mine water
 - We support the submission of a coal mining risk assessment and would expect this to support the ES and be informed by advice from the Mining Remediation Authority.
- Peat & peaty soils
 - The initial findings are noted, but scoping out peat is premature until the southern area and 20m corridor offsets are fully surveyed. The survey should be to appropriate standards.
 - Even if peat is generally absent, it is the Authority's view that the applicant should provide an Outline Peat/Soil Management Plan within the OCEMP (handling, storage, reinstatement, carbon accounting). A brief Peat Landslide Hazard Risk Assessment (PLHRA) screening should be included (recording the rationale for "no risk") given local topography and organic horizons.
- GWDTE
 - We support NVC surveys of marshy grassland and a hydrogeological dependency assessment. The proposed 100m / 250m excavation-depth based buffers (from SEPA guidance) are acceptable as a starting point, but the Authority would expect the ES to justify their application in Wales and confirm actual excavation depths along the route. Include seasonal water-level observations where feasible.
- Watercourse crossings & ditch network
 - A Watercourse Crossing Assessment should be prepared even if the number of crossings is limited, because:
 - The western element of the corridor has a dense ditch network and HMWB sensitivities.
 - Crossings/culverts can affect hydromorphology, fish passage, sediment regime and flood risk.

The design should be to CIRIA good practice, demonstrate pass-through of Qmed + climate change, blockage resilience, and overland exceedance routes. Provide method statements for in-channel works and pollution control.

- Flood Consequence Assessment (FCA)

- NPTCBC notes that NRW is the lead body for flood-risk evidence, modelling acceptance and FCA sign-off. In our view an FCA is required if any infrastructure lies within river/surface water/reservoir risk areas or alters drainage (including temporary works). The position is uncertain based on the information provided, but much of the area around the Margam substation is within the flood zone.
- Given that the proposed grid-connection electrical compound/substation (control building, switchgear, transformers, bunds) is likely to be located within a TAN 15 flood zone, we view flood risk as a key issue for decision-making.
- NRW should confirm the development vulnerability for the electricity substation (in our view this should generally be treated as essential infrastructure/utility), and apply the TAN 15 acceptability tests for new essential/utility infrastructure in Zones 2/3 and Defended Zones.
- In our view the FCA must demonstrate:
 - The compound can be constructed and operated safely for its design life under present and future climate conditions.
 - There will be no increase in flood risk elsewhere, including during construction.
 - The proposal meets TAN 15 acceptability tests for essential/utility infrastructure in flood zones, with residual risks understood and managed (e.g. culvert blockage, defence overtopping/breach, reservoir routing where relevant).
- The NGET's Margam GSP upgrade project is currently at the Pre Application Consultation (PAC) stage prior to submission to the Authority (<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/margam-substation>). This application is supported by a Flood Consequences Assessment: "*Margam Flood Consequences Assessment Report*" by Baker Hicks version P05 28.08.2025². This identifies likely impacts to third parties from the GSP upgrade in particular section 5.1.2 states "...Section 10.1 of the hydraulic modelling report enclosed at Appendix G confirms that the displacement of floodwaters by the proposed development would result in a minor increase in the flood extent within adjacent industrial premises..." The Authority is concerned that the Y Bryn Grid connection development which may require flood protection will also result in displacement of flood water impacting third parties. As evidenced by the supporting material to the NGET project there are potentially significant effects to third parties the GSP upgrade project, while not an EIA development, should be considered within an in combination assessment within the ES.
- For ease of review by consultees our preference is that the FCA is a standalone document.

- WFD compliance

- This is a matter largely for NRW to comment on, but we would anticipate that the developer would provide a WFD screening and (if needed) full assessment with a no-deterioration demonstration for:
 - Nant Cwm Philip and Ffrwd Wyllt waterbodies (ecological & chemical elements, hydromorphology, mitigation measures for HMWBs).

² <https://www.nationalgrid.com/sites/default/files/documents/2025-09/Flood%20Consequence%20Assessment.pdf>
Flood Consequences Assessment for NGET development.

- Groundwater body (Swansea Carboniferous Coal Measures) – focus on quality given “Poor” chemical status and mining legacy.
- Private water supplies (PWS) & abstractions
 - The Authority’s view is that the developer should re-check PWS with NPTCBC Environmental Health to confirm current status/locations. Where connectivity is uncertain, undertake appropriate tracing. Buffers should be adopted, a pre-start condition survey undertaken, contingency (temporary alternative supply) if an impact is detected and agree notification protocols with supply owners.
- SuDS / SAB
 - The Authority welcomes early engagement with NPTCBC SAB. The ES should show how temporary and permanent drainage will meet the Statutory SuDS Standards. The developer should provide greenfield runoff rate targets, treatment trains, maintenance plans, and construction-phase SuDS.
- Monitoring & incident response
 - The ES should commit to a construction water monitoring plan: baseline + during works + post-works, with parameters / thresholds, and stop-work protocols. Include spill response and dewatering discharge controls/permits.
- Cumulative effects
 - The Authority agrees with Y Bryn Wind Farm, National Grid upgrades and other relevant projects in the cumulative list. The list should be updated to include Port Talbot Solar Limited (NPT Scoping Opinion P2025/0699). The 2km radius is acceptable as a starting point, but please extend to hydrologically connected catchments where pathways exist (especially westwards via the ditch system).

Responses to the Applicant’s Consultation Questions (Questions 9.1 – 9.15)

Q9.1 Scope: The Authority largely agrees with the ES scope in principle, subject to: retaining contaminated land in scope pending Phase 1 PRA; retain peat until southern survey completion and PLHRA screening; ensure catchment-led scope where pathways extend beyond 2km.

Q9.2 Receptors scoped in/out: Mostly agree, but keep contaminated land and peat/peaty soils (until fully verified) in scope. Designated sites can remain scoped out only if pathway absence is evidenced with survey and levels.

Q9.3 Geological environment scoped out (except CMRA): Agree, provided the CMRA explicitly covers ground stability and implications for hydrology/hydrogeology.

Q9.4 PWS reporting: Agree that PWS can sit within the main chapter if the risk assessment is robust, up-to-date via NPTCBC EH, and includes engagement/contingency. If more than a few supplies are at risk or investigations are needed, a standalone appendix would be preferable.

Q9.5 Watercourse crossings reporting: The Authority’s view is that a short standalone WCA should be submitted because of regulatory sensitivity, even if crossings are few. If only micro-crossings of ephemeral ditches occur and the design/methods are simple and fully specified, we would accept inclusion within the main chapter.

Q9.6 Cumulative study area: Accept 2km as a starting radius, but require catchment-based extension where hydrological connectivity dictates.

Q9.7 Designated sites interactions: No objection in principle; however, the Authority considers that the ES should evidence lack of hydraulic pathway to Margam Moors SSSI with surveyed levels/flow directions and confirm overflow/operational arrangements for Eglwys Nunydd Reservoir SSSI (for completeness).

Q9.8 Downstream flood risk issues: The western lowlands may have surface water & ditch capacity sensitivities. The applicant is recommended to engage the LLFA early.

Q9.9 FCA location: If all infrastructure is demonstrably outside flood risk areas and does not materially alter drainage, then the FCA content can sit in-chapter. Where any risk exists, we prefer a standalone FCA to aid review, however we note that this is a matter largely for NRW.

Q9.10 WFD Assessment location: In our view this is acceptable in-chapter. If more than screening is required, then it should be placed in an appendix to keep the ES readable.

Q9.11 Legislation/policy/guidance: The Authority's view is that this is broadly appropriate. Please ensure latest TAN 15 allowances and Welsh SuDS Standards are applied; the developer should justify use of SEPA buffers for GWDTE in the Welsh context.

Q9.12 Contamination information & scoping: NPTCBC can check internal records, but regardless in our view a Phase 1 PRA is required before scoping out.

Q9.13 Peat depth data: The Authority does not currently hold additional peat data beyond what was provided for Y Bryn Wind Farm.

Q9.14 Methodology: Agree with the EIA method. The ES should additionally include: monitoring plan, construction phasing drainage, WCA design criteria, PLHRA screening, and PWS engagement protocol.

Q9.15 Tata Steel reservoir use: The Authority's understanding aligns with industrial cooling/management functions. Please seek NRW/Tata confirmation and once confirmed, it can be scoped out as a drinking-water receptor; it should be retained in the flood routeing and pollution pathway review until then.

Section 10: Landscape and Visual

General Comments

- NPTCBC welcomes the intention to undertake a Landscape and Visual Impact Assessment (LVIA) consistent with GLVIA3 (and subsequent clarifications) and NRW LANDMAP Guidance Note 46.

- The Authority agrees that landscape and visual considerations are likely to represent a key environmental issue given the site's proximity to areas of high landscape value, sensitive visual receptors, and the cumulative development context of existing and proposed energy infrastructure in and around Port Talbot and Margam.

- While the proposed methodology largely accords with established good practice, a number of refinements and clarifications are recommended to ensure that the LVIA provides a comprehensive and locally relevant assessment.

Scope and Methodology

• Study Area

The proposed 5km LVIA study area is noted; this is largely supported by the submitted ZTV, there are some areas of potential visibility to the north and south that extend beyond the 5km study area.

• Field Survey and Viewpoint Photography

- The intention to undertake fieldwork under good visibility conditions is supported. However, it should be ensured that photography and visualisations reflect seasonal variation in vegetation cover, as the degree of screening from woodland and trees will differ significantly between summer and winter.
- The methodology should confirm whether representative viewpoints will include both wireframes and photomontages, and at what scale of rendering (e.g. 50 mm equivalent lens) in accordance with LI TGN 06/19.

• Mitigation and Design Evolution

- The iterative approach to route refinement and mitigation is supported. The LVIA should demonstrate clearly how the design process has responded to landscape and visual sensitivities identified through baseline and viewpoint assessment, including any alignment options, tower design, micro-siting, or planting proposals considered.

• Assessment Parameters

- The use of bare-earth ZTV and screened ZTV is appropriate. However, the screened ZTV should be based on verified digital surface data (DSM) rather than broad assumptions on vegetation and built form.
- The LVIA should explain how the visual magnitude and extent of effects will be defined (e.g. small, medium, large) to ensure consistent and transparent evaluation.

• Landscape Character and Designations

- Landscape Character Areas (LCAs)
 - The identification of relevant LCAs from the Neath Port Talbot LANDMAP Landscape Assessment (2004) is supported. However, the assessment should ensure that updated LANDMAP datasets (Visual & Sensory, Historic, Geological, Cultural, and Landscape Habitat) are used, reflecting the most recent NRW revisions (2021 onwards).
 - The description of LCA6 (Mynydd Brombil, Mynydd Emroch & Mynydd Dinas) and LCA7 (Mynydd Margam) indicates a high degree of sensitivity to vertical or skyline features; these areas should therefore be assessed in detail for potential changes to character and perceived naturalness.

• Landscape Designations

- The proposal to focus on the Margam Special Landscape Area (SLA) and Margam Park Registered Historic Park and Garden (RHPG) is appropriate.

• Historic Landscape

- The overlap with the Margam Mountain Historic Landscape is noted. Coordination between the LVIA and the Cultural Heritage assessment is encouraged to ensure consistent treatment of visual and setting effects on this registered landscape.
- Visual Receptors and Viewpoints
 - The range of preliminary viewpoints in Table 10.1 is supported as a starting point. However, the following additions and clarifications are recommended:
 - Consider a viewpoint from the M4 corridor eastbound carriageway (west of Junction 38) to assess sequential visual effects for travellers.
 - Consider a viewpoint in the harbourside area of Port Talbot.
 - Viewpoint 7 (Margam Country Park) should include multiple locations within the park - e.g. near Margam Castle, the Orangery, and the higher Deer Park - to capture variations in visibility and viewer sensitivity.
 - Ensure that viewpoints cover a balance of receptor types (residential, recreational, transport, heritage).
- Residential Visual Amenity
 - The assertion that no properties lie within 150m of the overhead line should be confirmed through detailed mapping. Where properties are located beyond 150m but on elevated or open ground, they should still be considered in the LVIA under general residential visual amenity, not excluded solely on distance.
- Cumulative Assessment
 - The commitment to consider cumulative effects with other energy and infrastructure developments is welcomed. However, the cumulative baseline should specifically include:
 - Y Bryn Wind Farm (the host development);
 - Existing and consented renewable schemes (e.g. Mynydd Brombil, and any battery or solar developments within 10km, including Port Talbot Solar Limited (NPT Scoping Opinion P2025/0699));
 - Industrial infrastructure at Port Talbot Steelworks, the Biomass Power Station and the Sandvik Osprey development site;
 - Grid infrastructure proposals under development by National Grid or other DNOs.
 - Sequential and combined cumulative effects along key routes such as the M4, A48, St Illtyd's Way and Wales Coast Path should be explicitly addressed.
- Scoped In / Scoped Out
 - The proposed scoping-in of Margam SLA and RHPG is supported. However, exclusion of other designations such as the Kenfig Burrows SLA should be reconsidered until the final ZTV for the development and field survey confirm no intervisibility.
 - The scoping-out of receptors based solely on "limited or no visibility" at this stage is premature given the early design status. Visibility should be confirmed following finalised alignment and structure heights.

Responses to the Applicant's Consultation Questions (Questions 10.1 – 10.5)

Q10.1 Proposed approach and methodology: Generally appropriate and consistent with GLVIA3 and NRW GN46. Clarification required on treatment of cumulative effects, visual magnitude, and ZTV data sources.

Q10.2 5km study area: 5km acceptable as core LVIA area, but additional ZTV checks beyond 5km recommended to confirm absence of wider significant effects.

Q10.3 Scoped-in effects: Supported, but consider inclusion of adjacent SLAs (Western Uplands, Kenfig Burrows) and confirm accuracy of exclusion boundaries following detailed ZTV analysis.

Q10.4 Preliminary viewpoints: Supported subject to inclusion of additional viewpoints representing the M4 corridor. Multiple internal locations within Margam Country Park should also be assessed.

Q10.5 Cumulative approach: Supported in principle; cumulative baseline should include Y Bryn Wind Farm, existing local wind and solar schemes, and large-scale industrial infrastructure within the Port Talbot area.

Section 11: Heritage

General Comments

- The Authority welcomes the comprehensive overview of the legislative and policy context and the clear commitment to follow Cadw and ClfA guidance.
- However, further clarification and refinement are required to ensure that the assessment sufficiently captures potential indirect and cumulative impacts on the historic environment within Neath Port Talbot, particularly given the sensitive and well-documented historic landscape context around Margam and the upland areas of Margam Mountain.

Specific Comments

• Study Area

- **Q11.1 3Km Study area:** The proposed 3km study area for the cultural heritage assessment appears reasonable as a starting point for identifying potential setting effects. However, the extent of study should remain flexible, particularly for assets of high sensitivity such as Scheduled Monuments, Registered Parks and Gardens, and the Margam Mountain Landscape of Special Historic Interest (LSHI).
- For such assets, the Zone of Theoretical Visibility (ZTV) may extend beyond 3km, and the EIA should consider any visibility-based extension where warranted to capture indirect visual and setting effects.
- The Authority therefore recommends that a justification for the final study area is provided once the final ZTV and initial wireframes are available.

• Registered Historic Landscape (Margam Mountain LSHI)

- **Q11.2 Cadw view on ASIDOHL2:** The Scoping Report acknowledges that the Scoping boundary lies within the Margam Mountain LSHI, which contains several component Historic Landscape Character Areas (HLCAs).
- Given this, there is potential for significant effects on the integrity and historic character of this Registered Landscape, especially in combination with the existing and proposed wind energy developments associated with Y Bryn.
- The Authority considers that an ASIDOHL2 assessment should be undertaken, unless Cadw advises otherwise. The assessment should clearly articulate how the grid

connection infrastructure contributes to or detracts from the key characteristics and values of each relevant HLCA.

- Baseline Data and Sources

- **Q11.3 supplementary guidance:** The sources listed are comprehensive and appropriate. However:
 - The EIA should ensure cross-referencing between HER and Cadw datasets to avoid duplication and omission.
 - The Historic Environment Record (HER) data should be fully reviewed and filtered prior to the Environmental Statement to confirm the number and nature of unique assets within the study area.
 - Recent LIDAR and aerial data should be used to identify potential unrecorded archaeological features, especially within forestry or more upland terrain.

- Approach to Surveys

- **Q11.5 Surveys:** The proposed walkover survey is supported. However, it should be confirmed that the walkover will:
 - Include archaeological field verification of potential assets identified through desk study and remote sensing;
 - Cover all land directly affected by cable trenching, temporary construction compounds, and access routes; and
 - Be supplemented, where appropriate, by targeted geophysical survey or trial trenching if potential archaeological remains are identified.
- The Authority's Archaeological Advisors Heneb have advised that: *"...it is proposed to include a cultural heritage assessment in the ES. Such an approach is appropriate and we recommend it be composed of a full desk-based assessment carried out to the relevant Chartered Institute for Archaeologists Standards and Guidance and to a scope and methodology detailed in a Written Scheme of Investigation (WSI) agreed with ourselves. This is in accordance with both Planning Policy Wales, 12th Edition February 2024, Paragraph 6.1.26 and Technical Advice Note 24 Paragraphs 4.7-4.8. It should also be noted that the desk-based assessment is the first stage of the archaeological work, and depending on the results it is possible that further mitigation may be required, either pre or post-determination as appropriate."*

- Assessment of Effects and Methodology

- **Q11.4 Approach to assessment:** As far as the Authority is aware, the general assessment approach aligns with accepted practice. However:
 - The treatment of setting effects requires particular care given the topography and potential prominence of the proposed grid infrastructure.
 - The use of visualisations, wirelines, and photomontages should be integrated with the LVIA outputs to ensure consistency of viewpoint selection.
 - The Authority requests that clear cross-referencing with the Landscape and Visual Impact Assessment (LVIA) be included within the ES to ensure cultural heritage setting effects are robustly assessed.
- The proposal to distinguish between historic value and EIA significance is welcomed, though this distinction should be explicitly maintained and clearly explained in the ES.

- Cumulative Effects

- The Authority notes that there is no industry-wide methodology for cultural heritage cumulative effects but expects a clear narrative assessment to be provided, identifying:

- The list of cumulative developments considered (particularly other grid infrastructure and the Y Bryn wind farm itself and the Port Talbot Solar scheme);
- The combined effect of these schemes on the setting and character of key assets such as Margam Abbey, Margam Castle and Park, and the wider LSHI;
- Whether cumulative effects are additive, synergistic, or incremental.
- The LPA would welcome early dialogue on the cumulative baseline once the project list is agreed with PEDW and Cadw.

• Mitigation

- The stated focus on mitigating direct physical effects through standard archaeological procedures is appropriate.
- However, the EIA should also consider mitigation and enhancement measures for setting effects, which may include:
 - Micro-siting of infrastructure;
 - Sensitive alignment of underground cabling routes;
 - Design of above-ground elements (e.g, substations, transition compounds) to reduce visual intrusion;
 - Retention of existing vegetation or planting to screen or soften visual effects.
- Opportunities for interpretation or public benefit (e.g, improved understanding of the historic landscape) should also be explored where impacts cannot be fully avoided.

• Consultation

- The Authority welcomes inclusion of Cadw, Heneb, and Neath Port Talbot CBC as consultees.

Section 12: Highways

General Comments

- The Authority notes the proposed approach to assessing Traffic and Movement impacts arising from the construction of the Y Bryn Grid Connection. While the general scope and methodology broadly align with recognised guidance (ISEP, TAN 18, WelTAG, DMRB), several points require clarification or expansion to ensure the Environmental Statement (ES) adequately assesses potential local impacts on the highway network, communities, and active travel infrastructure.

Specific Comments

• 12.1 – Introduction and Access Arrangements

- The Authority notes the proposal to utilise the Y Bryn Wind Farm access for the northern section of works. Confirmation will be required that the capacity and design of this access are sufficient to accommodate the additional construction traffic associated with the grid connection without creating conflict or safety issues. The Authority does not support the use of the wind farm access route through Goytre for additional traffic.
- The statement that access “is expected” from M4 Junction 38 and the A48, with possible use of Cefn Gwrgan Road, Harbour Way (A4241) and Margam Energy Park access roads, requires more certainty. These routes pass through areas with existing congestion and sensitive receptors (e.g. Margam Village, the Energy Park, and the Margam Interchange). The EIA should test a reasonable worst-case scenario for all feasible access routes.

- The assessment should also consider any implications for the local road network within the administrative boundary of Bridgend CBC, given the cross-boundary nature of the grid connection.
- 12.2 – Legislation and Guidance
 - The proposed reference list is comprehensive. However, the ES should also have regard to:
 - The Neath Port Talbot Local Development Plan (and emerging Replacement LDP) transport policies, particularly those relating to construction traffic and protection of amenity.
 - The Authority's Active Travel Network Map (ATNM) and relevant routes potentially affected by cabling works, access points, or temporary diversions.
- 12.3 – Baseline Traffic Data
 - The reliance on secondary or non-neutral month data is noted. The ES should clearly justify the data sources used, explain limitations, and apply appropriate seasonal correction factors where relevant.
 - Given the scale of the project and sensitivity of local routes, NPTCBC recommends that updated traffic counts be obtained for key junctions and links near Margam, the A48, Harbour Way, and Cefn Gwrgan Road if existing data is over three years old or not representative.
 - Engagement with NPTCBC's Highways team is essential to confirm the suitability and accuracy of baseline data sources and to agree the growth factors and modelling assumptions.
- 12.4 – Assessment Methodology
 - The use of ISEP (2023) guidance and screening thresholds is supported in principle. However, the ES should ensure that local sensitivities, such as proximity to residential areas, schools, and active travel corridors are considered, even where traffic increases fall below the standard 10% threshold.
 - The methodology should also address temporary traffic management effects (e.g. lane closures, diversions, and short-term roadworks), which may generate localised disruption not captured by link-based percentage increases.
 - Cumulative assessment must include, as a minimum:
 - Y Bryn Wind Farm (DNS) construction traffic (noting likely overlap).
 - Port Talbot Solar Limited (NPT Scoping Opinion P2025/0699) (noting likely overlap).
 - Any major schemes at Harbour Way, or the M4 J38 corridor.
 - Other significant infrastructure or energy projects in the region.
- 12.5 – Consultation and Mitigation
 - NPTCBC welcomes the commitment to prepare an Outline Construction Traffic Management Plan (CTMP) as part of the ES. The CTMP should be prepared in consultation with the Authority's Street Works, Highways, and Public Rights of Way teams, and should include:
 - Swept paths for the largest anticipated vehicles, management of peak flows, banksman needs, and controls for school/shift-change peaks.
 - Defined haul routes and prohibited roads;
 - Controls on HGV movements during peak hours;

- Details of contractor parking, staff transport arrangements, and community liaison measures;
- Measures to maintain and signpost PRow and active travel routes; and
- A framework for monitoring compliance and responding to local complaints.
- Consideration should also be given to opportunities for shared use or coordination of logistics with the Y Bryn Wind Farm construction phase to minimise cumulative disruption.

• 12.6 – Potential Significant Effects

- The Authority agrees that the principal impacts will relate to the construction phase. The ES should present a clear quantitative assessment of anticipated traffic volumes (HGVs and LGVs) and their distribution over time.
- Amenity impacts on nearby residential areas, particularly around Margam, Cwmafan, and the A48 corridor, should be explicitly assessed, including potential effects from dust, noise, and severance.
- The potential for cumulative fatigue on the local network, particularly given concurrent large-scale infrastructure projects, should be fully assessed and not be underestimated.

12.7 – Scoped Out Topics

- The proposal to scope out operational and decommissioning traffic effects appears reasonable, provided that adequate justification is presented and that decommissioning remains of minimal scale.
- The proposed separate AIL assessment is supported; however, the ES should clarify the process for consultation with NPTCBC's highways officers and the police regarding AIL routing and any necessary temporary works or consents.

Responses to the Applicant's Consultation Questions (Questions 12.1 – 12.5)

Q12.1 Establishing future baseline: The approach to establishing baseline data is acceptable in principle but should prioritise recent, locally validated datasets. Consultation with NPTCBC Highways is essential.

Q12.2 Agreement to ISEP (2023): Agreement is given to the use of ISEP (2023) guidance, supplemented by local transport policy context.

Q12.3 Local Constraints: Known local constraints include:

- Margam Village, schools, colleges and residential areas;
- PRow and active travel routes;
- Regular events at Margam Country Park and on nearby land such as music festivals; and
- Existing congestion around M4 Junction 38 and Harbour Way at peak periods.

Q12.4 Scoping out of operational and decommissioning phases: Scoping out operational/decommissioning phases is acceptable, subject to justification.

Q12.5 Cumulative schemes: Cumulative schemes should include Y Bryn Wind Farm, Port Talbot industrial and energy projects, and any highway works associated with Harbour Way.

Section 13: Noise

General Comments

- NPTCBC welcomes the inclusion of a dedicated noise chapter and acknowledges that appropriate national and local guidance has been referenced. The approach appears generally proportionate for a linear grid connection project; however, several matters require clarification, refinement, or strengthening before the suggested scope can be considered agreed by the Authority. Any assessment of BS4142 shall include reference to BS8233:2014 external and internal noise level criteria at noise-sensitive assessment locations where relevant in terms of providing context to the assessment noise levels. Any proposed construction or operational plant shall be assessed using spectral data wherever data is available from chosen plant or reference data used as substitute.

Specific Comments

- **Baseline Characterisation**

- The Authority is concerned regarding the adequacy of the existing noise data: The Scoping Report suggests that baseline data from locations 1–2km away may be used to inform the assessment. This is not considered sufficient to represent the likely conditions at the most affected receptors, particularly any isolated rural dwellings located close to the proposed OHL or transformer yard. The Authority would expect targeted baseline noise monitoring to be undertaken at representative receptors along the route, including:
 - At least one location within a quieter rural area (north of Margam); and
 - At least one location within the urban fringe of Margam / southern Port Talbot. Background measurements should be of adequate duration (minimum 24-hour periods, including weekend and night-time conditions) to characterise temporal variations.
- In respect to receptor Identification: The commitment to identify receptors within 500 m is supported in principle; however, specific justification should be provided where construction works or OHL components may extend beyond that buffer, e.g, tower erection sites or access routes. Sensitive community facilities (schools, places of worship, care homes, hospitals etc) should also be considered, not just dwellings.

- **Construction Noise Assessment**

- Methodology (BS 5228-1): The proposed use of BS 5228-1 (ABC method) is appropriate; however, NPTCBC notes that site-specific ambient noise levels should be used to select the relevant threshold category rather than defaulting to Category A. The Authority will expect a clear justification for category selection and sensitivity testing for worst-case conditions. All core and non-core working hours must be explicitly defined. If night-time or weekend work is envisaged (e.g, traffic-sensitive areas or crossing of M4/A48), these should be assessed and not scoped out at this stage.
- Construction Traffic: The proposal to undertake a screening assessment for construction traffic noise using CRTN and DMRB LA111 is supported, but details of anticipated traffic flows and routeing should be provided when available. Any significant use of local roads in proximity to residential areas must be assessed.
- Section 61 Consents: The Authority agrees that Section 61 (CoPA 1974) applications may be required and welcomes early engagement with the Environmental Health team to agree appropriate control measures and working hours.

- Operational Noise Assessment

- Assessment Framework (BS 4142 / TR(T)94): The combined use of BS 4142 and National Grid TR(T)94 for assessing corona discharge and transformer noise is acceptable. However, the Scoping Report should clarify:
 - Whether transformer yard operational noise (e.g. cooling fans, auxiliary plant) will be assessed separately to OHL corona discharge; and
 - How cumulative operational noise from existing infrastructure (e.g. nearby substations, existing OHLs) will be considered.
- Background Noise Monitoring: The LPA does not support reliance solely on assumed or “worst-case” background levels. Measured background noise data should be collected at locations representative of the quietest receptors, especially in any more rural settings where corona discharge may be more perceptible.
- Criteria for Significance: The proposed interpretation of BS 4142 outcomes (i.e, +5 dB = adverse impact, +10 dB = significant adverse) is appropriate. However, NPTCBC expects the EIA to consider contextual factors, such as duration, tonal character, and sensitivity of rural receptors, when determining significance.

- Mitigation and Control

- Construction Phase: The embedded mitigation through Best Practicable Means (BPM) and inclusion within a Construction Environmental Management Plan (CEMP) is supported. The CEMP should include:
 - Site-specific noise limits and monitoring requirements;
 - Procedures for communication with nearby residents; and
 - A complaint management protocol.
- Operational Phase: If the transformer yard is located near sensitive receptors, acoustic enclosures or noise barriers may be required. Details of such measures should be considered early in design.

- Scoped-Out Topics

- Construction Vibration: Agreed, subject to confirmation that no significant piling or percussive works are proposed. If any piling or compaction is introduced, vibration assessment will be required.
- Operational Vibration: Agreed.
- Decommissioning Noise: Reasonable to scope out at this stage.
- Cumulative Construction Noise: the Authority advises caution. While current knowledge suggests limited concurrent activity, the Y Bryn Wind Farm construction may overlap temporally or geographically with grid works. The EIA should revisit cumulative effects once construction phasing for both projects is confirmed.
- Low-Frequency Noise: The proposed approach is acceptable provided that full-spectrum measurements are obtained and any low-frequency tonal features from transformers are identified within the BS 4142 assessment.

Responses to the Applicant's Consultation Questions (Questions 13.1 – 13.4)

Q13.1: BS 5228-1 (ABC method) appropriate?: Yes, subject to justification of category selection based on baseline and background noise monitoring and inclusion of night/weekend periods where relevant.

Q13.2: Corona discharge noise assessed with BS 4142 and TR(T)94?: Yes, this is appropriate; however, cumulative and transformer-related noise must also be assessed. As part

of the BS4142 assessment and context, reference shall be made to BS8233:2014 external and internal noise level criteria at noise-sensitive assessment locations where relevant

Q13.3: 500 m study area appropriate?: Generally acceptable, but should be extended where significant construction activity or access routes extend beyond this distance. Include all sensitive receptors (not only dwellings).

Q13.4: Scope out vibration, cumulative, and low-frequency noise?: Partially agreed. Construction vibration can be scoped out subject to confirmation of no piling. Should piling be required for any infrastructure then relative distances of any piling to noise sensitive receptors shall be provided and construction vibration assessments undertaken. Should distances between piling and noise-sensitive receptors be relatively large, then demonstration that attenuation over distance without requiring any mitigation methods could be accepted by justification. Cumulative construction noise should remain under review until the timing of related projects is confirmed. Low-frequency noise may be covered within BS 4142, provided full-spectrum analysis is undertaken.

Section 14 Other Matters

Major Accidents & Disasters (MA&D)

- The Authority notes that the Health and Safety Executive have been consulted on the scoping request and would provide specialist advice on this matter. However, the Authority does not agree that MA&D should be scoped out of the EIA. A project specific qualitative assessment is in the Authority's view required.

- The Authority takes this view due to the following:

- The route crosses/works adjacent to the M4 and A48, the route passes through/along commercial forestry and near the Western Bioenergy plant the route intersects with major accident hazards notified by HSE under COMAH, these are for a pipeline (high pressure gas main) and for the BOC chemical plan to the south. These introduce credible MA&D pathways (e.g. traffic interface during lifting, wildfire in forestry, storm damage to OHL, construction fuel spills, tower/pole failure, strike on buried services, incident at chemical plant).
- The developer should provide a concise MA&D chapter or appendix that:
 - Screens relevant natural and man-made hazards, explains ALARP measures, and links them to specific receptors (public highway users, PRoW users, nearby residents, ecology, watercourses).
 - Covers construction, operation and decommissioning separately.
 - Demonstrates liaison and emergency arrangements with NPT Emergency Planning, South Wales Fire & Rescue Service, NRW, Traffic Wales, and the highway authority (temporary traffic management on the M4/A48).
 - Addresses forestry wildfire risk and high-wind/storm procedures (including climate-change-exacerbated events).
 - Summarises utilities strike risk and control measures (PAS 128 surveys, permit-to-dig, stand-off distances).
- A concise statement confirming consideration of COMAH establishments and pipeline major accident risks and how they are managed should be included.

Q14.1 Scoping out of Major Accidents and Disasters: No. MA&D should be scoped in, in a proportionate manner as above.

Population & Human Health (incl. EMF)

- The Authority's position is that we are content that most population & health pathways can be brought together via other ES topics, but in our view a short integrative Human Health summary drawing together residual effects across noise, air quality, transport, LVIA, land contamination, and access/PRoW should be provided.
- Our view is that EMF should not be scoped out. In our view an EMF note/appendix should be provided demonstrating compliance with ICNIRP public exposure guidelines in line with the UK Code of Practice (DECC, 2012). While EN-5 is not determinative for DNS/SIP decisions in Wales, its EMF policies are a relevant material consideration and align with this approach. EN-5 expects promoters to demonstrate compliance with ICNIRP public exposure guidelines. The SR includes generic figures (e.g. 38.9 μ T) but no route-specific outputs. The developer should provide a concise EMF Note/Appendix that:
 - Uses the final OHL geometry (conductor heights, phasing, typical & maximum current) to produce magnetic and electric field profiles at ground level and at nearest dwellings, schools, and community facilities.
 - Maps the 1–2 μ T contours and electric fields along the alignment and at crossing points (PRoW, NCN, M4/A48).
 - Confirms compliance for public and workers, and includes a community enquiry protocol and commitments for any design changes.

Q14.2 Scoping out of Population and Human Health during operation: Yes, in principle provided a Human Health summary is included.

Q14.3 Scoping out of Population and Human Health during construction: Yes, provided synergistic/cumulative pathways are transparently pulled together in a summary.

Q14.4 Scoping out of EMF: No. In our view a concise EMF compliance assessment is required.

Climate Change

- The Authority supports scoping climate change into the Environmental Statement. The Authority expects the assessment to be robust, transparent, and compliant with Welsh legislation and policy, not just UK technical guidance. The Authority has the following comments:
 - 14.4.8 Legislation and guidance:
 - The assessment should be framed against Planning Policy Wales (Edition 12, 2024), Future Wales: The National Plan 2040, and the Environment (Wales) Act 2016, which place a legal duty on public bodies in making decisions to reduce emissions and to build resilience to the impacts of climate change.
 - The EIA should demonstrate how the proposal will help to deliver net-zero by 2050 and support the Welsh Government's Net Zero Wales Carbon Budget 2 (2021–2025) and subsequent carbon budgets.
 - The Authority notes that reference is made to the UK National Policy Statement EN-1, which in our view is acceptable for methodology, but the assessment must be clearly grounded in Welsh climate obligations and policy frameworks.
 - Greenhouse Gas (GHG) Assessment
 - The GHG assessment is welcomed and should quantify absolute lifecycle emissions (construction, operation, and decommissioning) in tonnes of CO₂e.

- Results should be presented in both absolute terms and as a proportion of Welsh carbon budgets, to give context on significance.
 - The ES should not rely solely on the enabling benefits of the associated Y Bryn Wind Farm to offset emissions. The grid connection should be assessed on its own carbon footprint, with the wind farm benefits presented separately and cumulatively.
 - The assessment should follow PAS 2080 (2023) and IEMA/ISEP guidance, with an emphasis on:
 - minimising embodied carbon (through material efficiency, low-carbon concrete and steel, reuse of excavated materials, etc.);
 - reducing construction transport and fuel use;
 - managing and re-using soils and timber arisings responsibly; and
 - ensuring low-carbon operation and decommissioning practices.
 - A carbon reduction hierarchy should be set out (avoid → reduce → substitute → offset), with realistic mitigation commitments integrated into the Construction Environmental Management Plan (CEMP) and procurement strategy.
 - The ES should confirm how as-built carbon performance will be monitored and reported.
- Climate Change Resilience and Adaptation (CCRA)
 - The Authority supports the proposed Climate Change Resilience and Adaptation (CCRA) assessment, which should assess the ability of the proposed development to withstand future climate conditions using UKCP18 projections.
 - The Authority agrees that the assessment should use a high-emissions scenario (RCP 8.5) for robustness and cover the anticipated 50-year design life.
 - The following climate risks should be explicitly addressed:
 - Increased frequency and intensity of storms, high winds, and lightning, particularly in upland areas;
 - Flooding and surface water drainage impacts on compounds, crossings, and construction access routes;
 - Drought and soil desiccation affecting ground stability and pole foundations;
 - Heat stress on electrical equipment and materials;
 - Wildfire risk in forestry areas, especially where vegetation clearance occurs; and
 - Interactions between climate change and other disciplines (for example, increased erosion or flood risk affecting water quality and ecology).
 - The ES should clearly set out design measures incorporated to ensure resilience — for example, structural design standards for wind loading, lightning protection, drainage design to future rainfall intensities, and management of vegetated corridors to reduce fire risk.
 - In-Combination Climate Change Impacts
 - The Authority supports inclusion of an “In-Combination Climate Change Impacts” assessment to identify how future climate conditions could exacerbate other environmental effects (for example, flood risk, noise, air quality, soil erosion, or biodiversity).
 - The ES should describe how adaptive management and monitoring will ensure the development remains resilient under changing conditions over its lifetime.

Q14.6 agreement to greenhouse gas and climate change assessments: Yes, subject to the clarifications above.

Air Quality

- The Authority's view is that construction dust and traffic emissions must be assessed; operational impacts may be scoped.
 - Use IAQM (2024) Construction Dust guidance and TG22; the developer should agree site-specific dust controls within the CEMP (on-site wheel washing, water suppression, haul road surfacing, stockpile management, triggers for additional controls, and complaints/monitoring protocol).
 - Traffic assessment to consider Port Talbot AQMA (M4) and near-road sensitive receptors. Provide ADMS-Roads modelling where screening thresholds are exceeded, verified against local monitoring.
 - Ecological assessment: apply Wales-appropriate screening for designated sites (noting the Natural England 200m rule is not Wales-specific); confirm NO_x and N deposition for any sensitive sites within influence of construction routes.
 - Cumulative impacts with Y Bryn Wind Farm and any concurrent strategic highway works must be explicitly assessed.
 - Operational phase: scoping out acceptable if the developer provides anticipated maintenance traffic volumes and confirm insignificance.

Q14.7 Scoping out of operational air quality impacts: Yes, the Authority agrees that operational air quality can be scoped out with a short justification (maintenance trip rates) and clear commitment to construction controls.

Material Assets & Waste

- The Authority's position is that this should not be scoped out entirely. The ES should provide a concise Materials & Waste section or appendix. The Authority has the following comments on this section:
 - We expect a quantified summary of key material streams (steel, concrete, conductors, poles/towers, cable, aggregates) and waste arisings (including soils), plus a Circular Economy approach consistent with PPW and the Environment (Wales) Act duties.
 - Confirm strategy for soil management and potential reuse under CL:AIRE DoWCoP (or justify disposal).
 - Identify any hazardous materials (e.g, preservation treatments for timber poles if relevant), end-of-life handling, and recycling targets.
 - If justified include an outline SWMP and Materials Management Plan commitments (to be secured via condition).

Q14.5 Scoping out of material assets and waste: No. the authority considers a proportionate Materials & Waste appendix should be scoped in.

Existing Infrastructure

- Public Rights of Way (PRoW), National Cycle Network (NCN) & Wales Coast Path
 - The Authority supports the assessment with emphasis on safe continuity and clear temporary management. The Authority requests that the ES contains:
 - A definitive PRoW plan overlaid with the scheme, including Wales Coast Path and NCN. Show temporary closures/diversions, duration, surfacing, gradients, and accessible alternatives; confirm legal processes (Highways Act orders) and signage strategy.
 - Construction RAMS to address interface risks where PRoW pass beneath OHL installations and near compounds; include separation distances and notifications to stakeholders.

- Opportunities for legacy upgrades (surfacing, signage) where proportionate.

Q14.8/Q14.9 PRow: We will verify against our records at application stage. The Authority requests that the applicant provide a GIS file so our PRow team can confirm accuracy and any updates within 2km.

• Utilities

- The Authority supports the proposed approach, with the following comments:
 - Provide consolidated search results (PAS 128 quality level), crossing schedules, method statements for A48/M4 and large culvert interfaces (if any), and protection/clearance distances for overhead telecoms and power.
 - Confirm telecommunications interference has been screened and relevant operator consultation undertaken.

Q14.10/Q14.11 Utilities map and additional data in 2km: Please share the utilities data pack (plans + schedule) used so we can check completeness and advise on any additions.

Forestry

- The Authority notes that Natural Resources Wales would have a key role in assessing forestry related impacts from the development. Our view is that a standalone Forestry Appendix would be appropriate.
 - Provide quantified felling areas/volumes by type (NRW estate, Woodland Trust, private), canopy loss, and restocking proposals; show ancient woodland buffers (minimum 15m; larger where topography requires), veteran tree RPAs, and avoid direct impacts.
 - Confirm OHL spans over AWI avoid any need for felling within AWI polygons; detail keyhole or edge-windfirm felling design where unavoidable outside AWI.
 - Include windthrow risk assessment, biosecurity (e.g. phytophthora), timing to avoid peak nesting, and interfaces with ecology (bats, dormouse) to be covered in the Biodiversity chapter.
 - Detail compensatory planting ratio, locations (on/off-site), and governance where planting cannot occur within the red line to accord with PPW 6.4.42.

Q14.12 Forestry Methodology: Yes, with the enhancements above.

Q14.13 Other guidance or information relevant to forestry at the site: Please engage early with NRW Forest Operations and Woodland Trust for up-to-date datasets and prescriptions.

Q14.14 Inclusion of AWI and other broadleaved woodlands in the forestry assessment: Yes - AWI and other broadleaved woodlands should be explicitly included in the Forestry Appendix and cross-referenced in Biodiversity and LVIA.

Yours sincerely



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