

Appendix 8G

Net Benefit for Biodiversity Report



Pennant Walters

FOEL TRAWSNANT GRID CONNECTION

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EXECUTIVE SUMMARY

Pennant Walters are seeking ecological support for a Development of National Significance (DNS) application for the proposed Foel Trawsnant Wind Farm electricity network infrastructure connection ('the Proposed Development'). The Proposed Development will be located between Bridgend and Neath Port Talbot Counties in South Wales, west of Maesteg.

WSP was commissioned by Pennant Walters to produce a Net Benefit for Biodiversity (NBB) report to support the DNS application and to guide the Proposed Development to meeting Welsh policy requirements on NBB and ecosystem resilience. Welsh policy advises that developments in Wales must demonstrate they have maintained and enhanced biodiversity and created resilient ecological networks. The NBB approach puts the emphasis on the proactive consideration of biodiversity and wider ecosystem benefits early in the design process. This has been considered throughout the Proposed Development's planning stages by conducting ecological surveys and adopting the 'stepwise approach'.

The 'stepwise approach' aims firstly to avoid, then minimise, mitigate, and as a last resort, compensate for adverse impacts on the environment that occur as part of a development. By following this approach, as detailed within this report (see **Table 4-1**), the Proposed Development will have the opportunity to fulfil its intention in creating the proposed grid connection, whilst also providing an enhanced area for biodiversity. The measures discussed will lead to an overall NBB and improve ecosystem resilience. The measures have been designed to support the objectives listed in the DECCA Framework.

For the Proposed Development to provide NBB in the long-term; management and monitoring requirements are recommended. These include habitat management over a 5-year period, inclusive of a management and monitoring plan for maintaining habitats of high biodiversity value including Priority Habitats, Ancient Semi-Natural Woodland (ASNW) and species-rich grassland. Regular reviews of the Conservation Plan will be required to assess its success and to make alterations where necessary.

1 INTRODUCTION

1.1 PROJECT BACKGROUND

- 1.1.1 WSP UK Ltd (WSP)¹ was commissioned by Pennant Walters to support a Development of National Significance (DNS) application for the proposed Foel Trawsnant Wind Farm electricity network infrastructure connection. The proposals are located between Bridgend and Neath Port Talbot Counties in South Wales, west of Maesteg.
- 1.1.2 The proposals, hereafter referred to as the 'Proposed Development' comprise 66 kilovolt (kV) overhead lines (OHL) and underground cables (UGC), which will provide a connection between the Foel Trawsnant Wind Farm and the wider national grid. The existing OHL (approximately 2km south-west of the settlement of Llangynwyd (British National Grid: SS841874)) will serve as the connection point for the proposals. The connection will consist of approximately 5.1km of UGC and approximately 3.9km of OHL. Whilst the requirement for a DNS application is triggered by the OHL section, the whole of the connection will require DNS consent. This report focuses mainly on the OHL section. In general, it has not been necessary to consider the UGC section as the UGC will be located beneath roads and therefore is not considered to affect ecological receptors. However, there are two locations which are exceptions to this. One location within the UGC boundary is required for tree felling to enable the works and therefore relevant discussions around this tree removal is included within this report. This location is shown on **Figure 8H-1** and hereafter referred to as the 'UGC tree felling area'. The UGC also impacts one watercourse, Nant Sychbant, and therefore, this watercourse is also considered as part of the assessment.
- 1.1.3 The requirement for a development to achieve a Net Benefit for Biodiversity (NBB) is secured in Welsh planning policy through Edition 12 of Planning Policy Wales (PPW) (Welsh Government, 2024). This includes an approach to delivering NBB in Wales, with the onus being placed on demonstrating both a measurable NBB and promoting ecosystem resilience. The NBB approach intends to deliver an overall improvement in biodiversity. It does not utilise a metric. It instead assesses improvement in biodiversity qualitatively, putting the emphasis on proactive consideration of biodiversity and wider ecosystem benefits within a placemaking context early in the design process. This approach encourages the consideration of features that may not necessarily be protected, but are crucial for ecosystem functioning, leading to more joined up spaces for nature. There is no mandatory length of time for which post-construction management is required in Wales.

¹ WSP have provided this report solely for the use of the recipient and accepts no liability to any third parties or any other party using or reviewing the report or any part thereof. WSP makes no warranties or guarantees, actual or implied, in relation to this report, or the ultimate commercial, technical, economic, or financial effect on the project to which it relates, and bears no responsibility or liability related to its use other than as set out within the scope of the contract under which it was supplied.

1.2 ECOLOGICAL BACKGROUND

- 1.2.1 In September and October 2024, WSP ecologists carried out a Preliminary Ecological Appraisal (PEA) of the OHL route, hereafter referred to as the 'Site' as shown on **Figure 8H-1** and an additional 50m study area of 50m around the Site. The whole study area is referred to as the 'PEA Survey Area' henceforth. This supplemented a CSA Environmental PEA report which was produced in October 2024 (CSA Environmental, 2024^a).
- 1.2.2 Eighteen Phase 1 habitats were present within the PEA Survey Area (shown in **Figure 8H-2**) of which eight are classified as Priority Habitats under the Environment (Wales) Act 2016. These included 'hedgerow', 'upland oakwoods', 'lowland mixed deciduous woodland', 'wet woodland', 'lowland dry acid grassland', 'lowland fen', 'purple moor-grass and rush pasture', and 'rivers' (shown in **Figure 8H-3**). The PEA Survey Area was assessed as suitable to support bats, badger *Meles meles*, otter *Lutra lutra*, water vole *Arvicola amphibius*, other mammals, birds, amphibians, reptiles, invertebrates, invasive non-native plant species (INNS), and notable plants. Although the habitats within the PEA Survey Area were considered suitable to support great crested newt *Triturus cristatus* and dormouse *Muscardinus avellanarius*, these species are considered likely absent from the PEA Survey Area given the results from targeted species-specific surveys conducted by CSA Environmental in 2024 (CSA Environmental, 2024^b; CSA Environmental, 2024^c). Targeted water vole surveys conducted by CSA Environmental in 2024 confirmed the presence of water vole directly adjacent to the Site (CSA Environmental, 2024^d).
- 1.2.3 A Daytime Bat Walkover (DBW) was carried out concurrently with the PEA. This identified three trees with the potential to support roosting bats, located in the southern section of the PEA Survey Area (shown on **Figure 8H-5**). The PEA Survey Area provided suitable habitat for foraging and commuting bats in the form of dense scrub, woodland, and linear habitats such as running water, tree lines and hedgerows.
- 1.2.4 Full PEA results have been published within the PEA report (WSP, 2025^a).
- 1.2.5 The following further ecological surveys are on-going and being carried out by WSP. Reports have been produced to support the DNS planning application which contain survey results so far. Version 2 reports with full survey results will be produced at a later date:
 - Otter survey report – Version 1 (WSP, 2025^b)
 - Combined bat survey report – Version 1 (WSP, 2025^c)
 - Ornithological survey report – Version 1 (WSP, 2025^d)
- 1.2.6 Furthermore, an Ecological Impact Assessment (EIA) has also been produced to support the DNS application (WSP, 2025^e).
- 1.2.7 An appropriately experienced ecologist has been consulted on the Proposed Development from the outset; advising on survey effort, avoidance of impacts and input into landscaping.

1.3 PROPOSED DEVELOPMENT

- 1.3.1 The Proposed Development comprises two components which will provide a connection between the Foel Trawsnant Wind Farm and the wider national grid. The 66kV connection will comprise:
- approximately 5.1km of UGC; and
 - approximately 3.9km of OHL.
- 1.3.1 It is proposed that the OHL will be carried on wooden H-poles, mostly at a height of 12m above ground level, and not exceeding 15m from ground level. Vegetation clearance is proposed to be kept to a minimum through 'micro-siting' or precise placement of OHL poles. Furthermore, where required, clearance of habitat will be temporary wherever possible with turf translocation utilised to maintain the species diversity of the temporarily removed habitats. Permanent removal of trees is proposed at one location within the 'UGC tree felling area' (as shown on **Figure 8H-1**) to facilitate the UGC works.
- 1.3.2 All opportunities for habitat retention have been taken into consideration. Where it is possible, habitat retention would be the most desirable option for biodiversity.

1.4 SCOPE OF REPORT

- 1.4.1 In response to recent developments in Welsh policy on NBB and ecosystem resilience, WSP was commissioned by Pennant Walters to produce a NBB report to support the planning application.
- 1.4.2 The aim was to assess if the Proposed Development achieves an NBB whilst also promoting ecosystem resilience, thus demonstrating compliance with planning requirements. The scope of this report is to:
- Provide an overview of the relevant ecological assessments that have informed the Proposed Development;
 - Provide an overview of the approach used to assess biodiversity enhancement and ecosystem resilience;
 - Summarise the legislative and policy requirements that shaped the assessment;
 - Discuss the ecological baseline of the Site and its ecosystem value;
 - Provide details of habitats lost to the Proposed Development;
 - Provide details of mitigation measures provided following the 'stepwise approach'²;
 - Provide examples of how the Proposed Development promotes the resilience of ecosystems through reference to the DECCA Framework;
 - Summarise the NBB assessment conclusion; and
 - Provide future management and monitoring requirements.

² See Section 1.6 for further information about the 'stepwise approach'.

1.5 RELEVANT LEGISLATION AND POLICY

1.5.1 The report has been compiled with reference to the following relevant nature conservation legislation and planning policy from which the protection of sites, habitats and species is derived in Wales. Relevant information regarding legislation/planning policy which is relevant to the Proposed Development and achieving a NBB is detailed in **Appendix A** and is listed below:

- The Environment (Wales) Act 2016;
- The Wellbeing of Future Generations Act 2015;
- Nature Recovery Action Plan Wales (NRAP) – the Biodiversity Strategy for Wales. Part 1: Our Strategy for Nature (2015) and Part 2: Nature Recovery Action Plan (2020 – 2021);
- PPW 2024 (Edition 12);
- Future Wales – The National Plan 2040;
- The DECCA Framework (see Section 1.7);
- Replacement Neath Port Talbot CBC Local Development Plan 2023-2038; and
- Replacement Bridgend Local Development Plan 2018 to 2033.

1.6 STEPWISE APPROACH AND COMPENSATION

1.6.1 Biodiversity enhancements that achieve NBB must be delivered following the implementation of the ‘stepwise approach’ of firstly avoiding, then minimising, mitigating and, as a last resort, compensating for adverse impacts on the environment that occur as part of a development. Compensation should only be considered as a last resort, where it has been demonstrated clearly that adverse effects on the environment cannot be avoided or fully mitigated. If compensation is necessary, this must be delivered on-site where possible but off-site compensation can be sought if demonstrated that on-site compensation is not possible.

1.6.2 This approach will encourage the consideration of features that may not necessarily be protected, but are crucial for ecosystem functioning, leading to more joined up spaces for nature.

1.7 DECCA FRAMEWORK

1.7.1 PPW 2024 instructs planning authorities to take account of and promote the resilience of ecosystems when assessing planning applications.

1.7.2 Natural Resources Wales (NRW) have developed a framework for evaluating ecosystem resilience based on five attributes and properties specified in the Environment (Wales) Act 2016. This is referred to as DECCA and comprises the objectives listed:

- Diversity – maintaining and enhancing diversity at every scale, including genetic, structural, habitat and between-habitat levels. This supports the complexity of ecosystem functions and interactions that deliver services and benefits.
- Extent – incorporating measures which maintain and increase the area of semi-natural habitat/features and linkages between habitats. In general, smaller ecosystems have reduced capacity to adapt, recover or resist disturbance.
- Condition – the condition of an ecosystem is affected by multiple and complex pressures acting both as short term and longer-term types of disturbance. Both

direct and wider impacts should be considered, for example avoiding or mitigating pressures such as climate change, pollution, invasive species, land management neglect etc.

- Connectivity – this refers to the links between and within habitats, which may take the form of physical corridors, stepping stones in the landscape, or patches of the same or related vegetation types that together create a network that enables the flow or movement of genes, species and natural resources. Developments should take opportunities to develop functional habitat and ecological networks within and between ecosystems, building on existing connectivity.
- Adaptability to change – ecosystem resilience is a product of the above four attributes. Adaptability, recovery and resistance to/from a disturbance are defining features of ecosystem resilience.

1.7.3 NRW define ecosystem resilience as “An environment that can respond to pressures by resisting, recovering or adapting to change, and is able to continue to provide natural resources and benefits to people”.

1.7.4 NRW has a duty to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used. Article 4 of the Natural Resource Body for Wales (Establishment) Order 2012 (Welsh Government, 2012) sets a general purpose for NRW to pursue the Sustainable Management of Natural Resources (SMNR) in the exercise of its functions. In order to achieve this, NRW applies a set of 9 principles: adaptive management, scale, collaboration and engagement, public participation, evidence, multiple benefits, long term (consequences of actions), preventative action, and building resilience.

1.7.5 Importantly, the objective of the SMNR is to maintain and enhance the resilience of ecosystems and the benefits they provide and, in so doing, meet the needs of present generations of people without compromising the ability of future generations to meet their need, and contribute to the achievement of the goals of the Well-being of Future Generations Act 2015.

2 SITE BASELINE

2.1 CURRENT BIODIVERSITY VALUE

- 2.1.1 The Site is split into two distinct areas; a northern and a southern section as shown in **Figure 8H-1**. Both areas of the Site are situated within rural areas to the west of Maesteg.
- 2.1.2 The northern section of the Site comprised purple moor-grass *Molinia caerulea* and soft-rush *Juncus effusus* dominated pastures along with agricultural fields of acid grassland. Dry stone walls were present in a few places as well as ditch networks across wetter areas of *Molinia* grassland, however, the habitats were largely very open and expansive with no clear boundaries.
- 2.1.3 The southern section of the Site was more divided by lines of trees, hedgerows, fences and watercourses, forming clear boundary lines between parcels of agricultural land. Four parcels of woodland and two main watercourses transected the Site; Nant y Castell and Nant Llest-Wen. Habitats were heavily modified through sheep or cattle-grazing.
- 2.1.4 Since 2024 there have been several ecological assessments carried out of the Site in support of the Proposed Development (see Section 1.2). These have been carried out previously by CSA Environmental. Further details of how these assessments contribute to the Site's ecological baseline is provided below.

2.2 CSA ENVIRONMENTAL SURVEYS

- 2.2.1 In May 2024, CSA Environmental carried out a PEA of the Site (CSA Environmental, 2024^a). The report identified that the OHL element of the Proposed Development crosses grassland, woodland and hedgerow habitat. This also included habitats which were considered irreplaceable (Ancient Woodland Inventory (AWI) parcels), Priority Habitats and Sites of Importance for Nature Conservation (SINCs). Presence of reptiles and water voles were incidentally confirmed during the survey, with likely presence determined for bats, dormouse, nesting birds and harvest mouse *Micromys minutus*. Further surveys for bats, great crested newt (GCN) *Triturus cristatus*, dormice and water vole were recommended.
- 2.2.2 Follow-on surveys for GCN and dormice found likely absence of these species (CSA Environmental, 2024^b; CSA Environmental, 2024^c), whilst previous water vole surveys found presence of water vole within the northern section of the PEA Survey Area (CSA Environmental, 2024^d).

2.3 DESK STUDY

- 2.3.1 A desk study was carried out by WSP in October 2024 as part of the PEA (WSP, 2025^a). Its purpose was to identify designated sites, habitats of conservation importance and records of protected/notable species within search areas of various appropriate distances from the Site.
- 2.3.2 Three Special Areas of Conservation (SACs) were within 10km of the Site. These included Glaswelltiroedd Cefn Cribwr/Cefn Cribwr Grasslands SAC, Kenfig/Cynffig SAC and Blackmill Woodlands SAC. Due to distance from the Site and lack of functional habitat connectivity between the SACs and the Site, it is anticipated that

there will be no impact on any of these SACs resulting from the Proposed Development.

- 2.3.3 Sections of the Site fall within 5 of the of the 22 non-statutory nature conservation sites identified within 2km of the Site. These included Abercerdin Wood, Caerau West, Cwm Cerdin, Gilfach Uchaf, and Nant-y-Castell Grasslands SINC. These locations are shown in **Figure 8H-4**.
- 2.3.4 A total of 39 parcels of AWI woodland were identified within 1km. It was recorded that one section of the Site falls within one parcel of Ancient Semi-Natural Woodland (ASNW), spanning both banks of the Nant Lluest -Wen, which flows through the Site. This AWI parcel is shown in **Figure 8H-3**.
- 2.3.5 Full information regarding the desk study can be found within the PEA report (WSP, 2025^a).

2.4 PHASE 1 HABITAT SURVEY

- 2.4.1 A Phase 1 habitat survey of the PEA Survey Area was carried out as part of the PEA by WSP in September and October 2024 (WSP, 2025^a).
- 2.4.2 The Phase 1 habitat survey was carried out by surveyors with extensive experience in completing habitat surveys of sites containing similar habitat types to that on the Site. Habitats were described and mapped following the standard Phase 1 habitat survey methodology (JNCC, 2016).
- 2.4.3 Habitats recorded during the survey are listed below and are mapped on **Figure 8H-2**. Alpha-numeric codes used in this section cross-refer to the JNCC Phase 1 habitat survey classification (JNCC, 2016). A more detailed account of habitats present within the Site is provided in the PEA report (WSP, 2025^a).
- 2.4.4 Habitats recorded within the PEA Survey Area included:
- A1.1.1 – Broadleaved woodland – Semi-natural;
 - A1.1.2 – Broadleaved woodland – Plantation;
 - A1.2.2 – Coniferous woodland – Plantation;
 - A1.3.2 – Mixed woodland – Plantation;
 - A2.1 – Scrub – Dense/continuous;
 - A2.2 – Scrub – Scattered;
 - A3.1 – Broadleaved parkland/scattered trees;
 - B1.2 – Acid grassland – Semi-improved;
 - B4 – Improved grassland;
 - B5 – Marshy grassland;
 - B6 – Poor semi-improved grassland;
 - C1.1 – Bracken – Continuous;
 - C1.2 – Bracken – Scattered;
 - C3.1 – Other tall herb and fern – ruderal;
 - G2 – Running water;
 - J2.1.2 – Species-poor intact hedge;
 - J2.5 – Wall;
 - J2.6 – Dry ditch; and
 - Hardstanding

- 2.4.5 Multiple habitat parcels across the PEA Survey Area were identified as various Priority Habitats in accordance with Section 7 of the Environment (Wales) Act 2016. These Priority Habitats are 'lowland dry acid grassland', 'purple moor-grass and rush pasture', 'lowland fen', 'rivers', 'upland oakwoods', hedgerows, 'lowland mixed deciduous woodland' and 'wet woodland'. (see **Figure 8H-3**) Under Section 7 of this legislation all public bodies (including local planning authorities) must 'take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section and encourage others to take such steps.'

2.5 DAYTIME BAT WALKOVER

- 2.5.1 A DBW was carried out concurrently with the Phase 1 habitat survey within the PEA Survey Area (WSP, 2025^a). This identified three trees with the potential to support roosting bats, located in the southern section of the PEA Survey Area (shown as T1, T2 and T3 on **Figure 8H-5**. T1 and T2 were mature sessile oaks *Quercus petraea* with tear out wounds; T3 was a twin-stemmed sessile oak with a wound hosting an active bees' nest in one stem and two woodpecker (likely greater spotted woodpecker *Dendrocopos major*) holes on the other stem. A fourth tree with bat roosting suitability (T4) was identified during the further surveys following the DBW. Details of T4 are provided in Section 2.7, and its location is shown on **Figure 8H-5**.
- 2.5.2 The PEA Survey Area provided suitable habitat for foraging and commuting bats in the form of dense scrub, woodland, and linear habitats such as running water, tree lines and hedgerows.

2.6 PROTECTED AND NOTABLE SPECIES

- 2.6.1 The potential for the PEA Survey Area to support legally protected and/or notable species was assessed using the results of the desk study and observations made during the field survey of habitats within and immediately surrounding the Site. The assessment of habitat suitability for protected and/or notable species was based on professional experience and judgement. This was supplemented by standard sources of guidance on habitat suitability assessment for key faunal groups including: bats (Collins, 2023 and Mitchell-Jones, 2004); badger (Harris *et al.*, 1991 and Roper, 2010); otter (Chanin, 2003); water vole (Dean *et al.*, 2016); dormouse (English Nature, 2006); birds (Gilbert *et al.*, 1998 and Bibby *et al.*, 2000); reptiles and amphibians (Froglife, 1999, Gent and Gibson, 2003 and English Nature, 2001); and invertebrates (Drake *et al.*, 2007 and Kirby, P., 2001).
- 2.6.2 The surveys conducted within the PEA Survey Area identified that habitats had suitability to support:
- Bats;
 - Dormouse;
 - Badger;
 - Otter;
 - Water vole;
 - Brown hare *Lepus europaeus*;
 - Hedgehog *Erinaceus europaeus*;
 - Harvest mouse;
 - Birds;



- Amphibians;
- Reptiles;
- Fish;
- Invertebrates;
- INNS; and
- Notable plants.

- 2.6.3 Despite presence of suitable habitat, GCN and dormouse were considered to be likely absent from the PEA Survey Area following on from the CSA surveys carried out in 2024 (CSA Environmental, 2024^b and CSA Environmental, 2024^c).
- 2.6.4 Due to the recency of surveys carried out by CSA and the suitability of habitats present, water voles are assumed to be present within the PEA Survey Area (CSA Environmental, 2024^d). A European Protected Species (EPS) license is recommended to be sought from NRW in the event of impact of suitable habitats, and an appropriate Conservation Plan followed (see Principles of a Conservation Plan for Water Vole (WSP, 2025^f).
- 2.6.5 Further surveys were recommended for bats, otters and birds, in addition to other mitigation measure including a pre-works checks for badger and INNS and Precautionary Methods of Works (PMoW).

2.7 FURTHER BAT SURVEYS

- 2.7.1 Following the previous surveys and the identification of suitable habitat roosting, foraging and commuting bats within the Site, Pennant Walters commissioned WSP to undertake bat activity and roosting surveys. These were carried out in the form of automated static bat detector surveys, a Night-time Bat Walkover (NBW) and close inspection tree survey. These surveys were all carried out within the PEA Survey Area, with an additional static bat detector placed within the UGC tree felling area.
- 2.7.2 Overall, bat activity surveys within the Site and UGC tree felling area recorded at least nine bat species including: common pipistrelle *Pipistrellus pipistrellus*; soprano pipistrelle *Pipistrellus pygmaeus*; Nathusius' pipistrelle *Pipistrellus nathusii*; Myotis bat species *Myotis sp.*; noctule *Nyctalus noctule*; serotine *Eptesicus serotinus*; Leisler's bat *Nyctalus leisleri*; brown long-eared bat *Plecotus auritus*; and lesser horseshoe bat *Rhinolophus hipposideros*.
- 2.7.3 Commuting and foraging activity was recorded along hedgerows, tree lines and along the edge of the ASNW within the Site. It was also recorded along the line of trees within the UGC tree felling area. For this reason, it was determined that, in the absence of mitigation, the Proposed Development has the potential to impact bats through both temporary and permanent removal of habitats which have suitability for commuting and foraging activities.
- 2.7.4 Whilst no bats or bat roosts were identified during the close inspection tree surveys, three trees (T2, T3 and T4) were identified as having suitability to support individual or small numbers of roosting bats (Potential Roost Feature (PRF)-I). Of these, T2 and T4 had potential to be impacted by the Proposed Development by lopping of branches.
- 2.7.5 Relevant figures are provided, and recommendations are outlined, within the bat survey report (WSP, 2025^c)

2.8 FURTHER OTTER SURVEYS

- 2.8.1 Following the recommendation within the PEA report (WSP, 2025^a), otter surveys of the three watercourses within the Site (Nant y Ffyllon; Nant Llest-wen; and Nant y Castell) and their surrounding riparian habitat were carried out. Nant Sychbant was also included within the survey due to potential impacts to the watercourse during the installation of the UGC. The Nant Sychbant crossing will be undertaken through installing a temporary dam and laying the cable through an open cut method, following best environmental practice. The watercourses were surveyed 200m up- and down-stream from the Site or the UGC proposed route.
- 2.8.2 Seven potential resting places and one confirmed resting place for otter were identified within Nant Sychbant and adjacent woodland parcels. Nant Sychbant was also identified to provide suitable foraging and commuting habitat, with fish noted to be present.
- 2.8.3 No field signs, resting places, couches or holts were identified within Nant y Ffyllon, Nant Llest-wen or Nant y Castell during the surveys. These watercourses were considered suitable for commuting otter and adjacent woodland parcels surrounding Nant y Ffyllon and Nant Llest-wen provided resting suitability, however, foraging opportunities were limited across three watercourses.

- 2.8.4 Relevant figures and recommendations are outlined within the other report (WSP, 2025^b).

2.9 FURTHER ORNITHOLOGICAL SURVEYS

- 2.9.1 Survey work during the 2025 wintering and breeding season completed thus far comprised of vantage point (VP) surveys from two locations; three moorland bird surveys (MBS) visits within 500m of the Site; one nightjar *Caprimulgus europaeus* survey of suitable habitat within 500m of the Site; and three breeding raptor walkover surveys within 2km of the Site.
- 2.9.2 During the VP surveys carried out in the wintering season, one target species was recorded with a single flight recorded: goshawk *Accipiter gentilis*. During the breeding season, four target species were recorded during VP surveys: goshawk, red kite *Milvus milvus*, kestrel *Falco tinnunculus* and merlin *Falco columbarius*. Red kite was the most regularly recorded target species during the VP surveys (14 flights, totalling 14 individual flights).
- 2.9.3 Breeding waders recorded during the MBS comprised of a single snipe *Gallinago gallinago* territory.
- 2.9.4 Nightjar were recorded near to both the northern and southern section of the Site during the first nightjar survey in mid-June. Three males were recorded churring and displaying >100m south from the northern section of the Site, with a fourth and fifth male recorded churring >500m south from the northern section of the Site. These observations were all recorded within the Afan Forest Southeast Circular in particular areas of cleared/felled plantation woodland. Two males were recorded churring >400m southwest of the southern section of the Site in the Upper Craig Yr Aber Woods, with an additional male churring distantly to the west.
- 2.9.5 No Annex 1 of the Birds Directive/ Schedule 1 of the Wildlife and Countryside Act (WCA) (HMSO, 1981) target species were recorded during the three breeding raptor surveys completed to date.
- 2.9.6 Relevant figures and recommendations are outlined within the ornithological report (WSP, 2025^d).

3 HABITAT LOSS AND GAINS

- 3.1.1 Minimal vegetation clearance is proposed to enable the construction of the Proposed Development. This will be achieved through 'micro-siting' or precise placement of OHL poles. Furthermore, where required, clearance of habitat will be temporary wherever possible. No tree removal is required to facilitate the OHL works. Permanent removal of trees is proposed at one location to facilitate the UGC works within the UGC tree felling area (see **Figure 8H-1**).
- 3.1.2 There will, however, be small scale impacts on SINC, one AWI parcel and several Priority Habitats from unavoidable and temporary habitat removal. This is in addition to the small scale, but permanent removal of trees mentioned above.
- 3.1.3 Indicative areas of temporary and permanent habitat loss of SINC habitat are shown in Table 3-1 and areas of indicative temporary and permanent habitat loss of Priority Habitat or habitats of conservation importance (including AWI) are shown in Table 3-2. Much of the SINC habitat overlaps with areas of Priority habitat or habitats of conservation importance (as shown in **Figure 8H-4**) and should not be added together to calculate a total loss.

Table 3-1 – Indicative Temporary and Permanent Land Take Areas of SINC habitat

Feature	Indicative Temporary Land Take Areas (ha)	Indicative Permanent Land Take Areas (ha)
Abercerdin Wood	0.53	N/A
Caerau West	1.35	N/A
Cwm Cerdin	0.50	N/A
Gilfach Uchaf	1.33	N/A
Nant-y-Castell Grasslands	0.15	N/A
Total	3.86	N/A

Table 3-2 – Indicative Temporary and Permanent Land Take Areas of Priority Habitat or habitats of conservation importance

Feature	Indicative Temporary Land Take Areas (ha)	Indicative Permanent Land Take Areas (ha)
Wet woodland	0.06	N/A
Lowland dry acid grassland	0.73	N/A
Lowland fen	0.02	N/A
Lowland mixed deciduous woodland	0.34	N/A
Purple moor-grass and rush	1.64	N/A
AWI parcels	0.19 (no tree removal)	N/A
Tree Removal	N/A	0.01
Total	2.79*	0.01

- 3.1.4 Temporarily lost habitat is considered to be small scale. No tree removal is required to facilitate the OHL works with most of the temporary habitat loss impacting grassland habitats. Some removal of tree branches may be required. The Proposed Works are only anticipated to impact the ground flora of woodland, including AWI parcels and parcels of Priority habitat woodland. This loss is considered of low significance in comparison to the availability of this habitat in the wider Site. All temporarily removed grassland habitats or woodland ground flora will be translocated by turf layer translocation during the construction phase. This will follow appropriate methodology to avoid soil compaction. Turfs will be stored securely and will be reinstated as soon as is feasible, with appropriate aftercare (e.g. watering during dry weather).
- 3.1.5 In addition to turf translocation, habitat creation and enhancement within habitats of low ecological value will be carried out within the Site. This will include enhancing retained parcels of improved grassland and poor semi-improved grassland into species-rich acid and neutral grassland parcels through the inclusion of species-rich seed mixes and incorporation of plugs/seeds to create new areas of purple moor-grass and rush pasture where appropriate. Enhanced habitats will be subject to long-term management to maintain botanical diversity.
- 3.1.6 Mitigation and compensation will be provided for the permanent habitat loss through replacement of lost trees within the UGC section at a 3:1 ratio. This will be achieved through the creation of new hedgerows and tree lines throughout the Site, as well as strengthening of existing tree lines.
- 3.1.7 Any adverse impacts on trees with bat roosting suitability and high-quality bat commuting routes will be avoided where possible. However, it has been determined that the Proposed Development has potential to affect trees with potential to support roosting bats (T2 and T4) (WSP, 2025c). These trees will not be removed in their entirety, but may be subject to removal of branches which, unless mitigation measures are in place, has potential to result in the loss, damage or disturbance of a bat roosting feature.
- 3.1.8 Whilst no bats were recorded within any of the tree surveys, bats are known to have a highly mobile and opportunistic nature and may start using a roosting site, or potential roosting site, after it has been surveyed or may have been roosting somewhere else during the period it was surveyed. For this reason, bats may potentially be present but remain undetected at the time of survey. 'Micro-siting' will be utilised to avoid trees with bat roosting suitability where possible, however, where they cannot be avoided, the trees should be fully inspected by an appropriately licenced bat ecologist immediately prior to works to ensure no bats are present.

- 3.1.9 In the event that bats are found to be present during the pre-works survey, works would be postponed, and advice sought from NRW. It may be necessary to apply for an EPS licence from NRW to allow the lawful removal of the tree/limb.
- 3.1.10 Additional mitigation measures are recommended which are also intended for incorporation into the wider Site – see Section 4. These measures include mitigation for specific protected/notable species e.g., bats, otters and birds.
- 3.1.11 Habitat retention is considered the most desirable option for biodiversity. It is recommended that where there is the opportunity, habitats will be retained as far as practicable for the Proposed Development. In particular, retention of connective habitats should be prioritised owing to their importance in maintaining wildlife corridors/commuting routes, a key point for ecosystem resilience – see Section 1.7 ‘DECCA Framework’. Such habitats within the Site include boundary scrub, woodland, lines of trees and hedgerows. This avoidance of vegetation clearance strategy has already been worked into the Proposed Development design.
- 3.1.12 It is understood that habitat replacement (i.e., 3:1 replacement of permanently lost trees), turf translocation and grassland enhancement can be achieved within the footprint of the Proposed Development design. This is owing to the small areas of proposed habitat clearance required to enable the Proposed Development.
- 3.1.13 Work exclusion buffer zones around ecologically sensitive features have been identified to include;
- a 5m work exclusion area surrounding suitable commuting routes for bats and otter, as well as on watercourses suitable to support water vole and the parcel of ASNW; and
 - a 30m work exclusion area surrounding potential and confirmed otter resting places along Nant Sychbant.
- 3.1.14 These buffer zones are shown on **Figure 8H-6**.
- 3.1.15 Additional measures for species which were identified in the ecological surveys as potentially present within the Site include the creation of artificial opportunities for resting and breeding. This is discussed further in Section 4.
- 3.1.16 These recommended measures will enable NBB to be achieved in combination with the additional avoidance, minimisation, mitigation and compensation measures detailed in Section 4.

4 STEPWISE APPROACH TO MITIGATION

- 4.1.1 This section outlines the 'stepwise approach' that has been followed to avoid, minimise, mitigate and compensate impacts resulting from the Proposed Development.
- 4.1.2 An experienced ecologist has been involved with the Proposed Development from the outset, advising on survey requirements and measures to avoid, minimise, mitigate and/or compensate impacts to species and habitats. This stepwise approach taken to deliver a NBB is described in detail in **Table 4-1**.
- 4.1.3 Biodiversity and wider ecosystem benefits were considered early in the design process for the Proposed Development. This led to design changes, including the retention of habitats (through 'micro-siting' of OHL masts) and avoidance of disturbance to protected species where possible (i.e., use of suitable work exclusion buffers surrounding sensitive ecological features, or avoidance of tree removal in the first instance). This accords with the 'Avoidance' principle of the stepwise approach.
- 4.1.4 Where it was not possible to avoid specific biodiversity impacts, measures to minimise the impacts were recommended. This led to the recommendation of several strategies and method statements which will aim to minimise the Proposed Development's impact on biodiversity. This accords with the 'Minimise' principle of the stepwise approach.
- 4.1.5 Where predicted impacts may still occur following avoidance measures and measures to minimise impacts, mitigation measures will be implemented. Mitigation and enhancement measures have been designed to reduce the impacts of the Proposed Development, supporting the 'Mitigate' principle of the stepwise approach.
- 4.1.6 Additional compensation measures were considered as a last resort when biodiversity impacts could not be fully mitigated. This accords with the 'Compensate' principle of the stepwise approach.
- 4.1.7 The stepwise approach applied for ecological receptors through the development of proposals is summarised in **Table 4-1**. By following this approach, the Proposed Development will have the opportunity to fulfil its intention in creating the proposed grid connection, whilst also providing an enhanced area for biodiversity. The measures discussed will lead to an overall NBB and improve ecosystem resilience.
- 4.1.8 A plan showing mitigation and enhancement proposals is shown on **Figure 8H-6**.

Table 4-1 – Stepwise approach taken to deliver NBB

Avoidance	Minimise	Mitigate	Compensate
Avoidance of habitat removal through 'micro-siting' mast locations. Working to avoid all habitat loss in the first instance wherever possible and then 'micro-siting' to avoiding Priority habitats, focusing mast locations into open areas of agricultural grassland areas. Avoidance of ecologically sensitive features through the use of buffers (see Figure 8H-6).	Produce and adhere to a Construction Environmental Management Plan (CEMP). This will provide good construction site management practices to minimise effects on air quality, noise and vibration, traffic and water quality. It will also ensure that environmental best practice is followed so that habitats and species are safeguarded during construction and are appropriately managed during operation. A suitable lighting strategy will be outlined within the CEMP. Although no night-time working is anticipated, shorter daylight hours during the winter months may lead to the ad hoc requirement for artificial lighting during these periods. Directional lighting will be utilised to prevent light spill onto sensitive habitats.	Temporarily removed habitat will be translocated or replaced as soon as possible following an appropriate method statement.	Incorporate species-rich grassland mixes of local provenance, inclusive of native wildflowers/plugs where appropriate throughout the Site. These can be utilised to enhance retained grasslands of low biodiversity value, i.e., improved grassland. Good horticultural practice should be utilised, including the use of peat-free composts, mulches and soil conditioners.
Avoidance of long-term habitat fragmentation, e.g., no anticipated removal of hedgerows and design of working methods to result in the majority of habitat removal being temporary.	Adherence to a Precautionary Methods of Work (PMoW). This will include a pre-works check and supervision by an Ecological Clerk of Works (ECoW) to check and confirm that Site conditions have not changed and that no additional ecological receptors require consideration before works begin.	Implement a sensitive mowing strategy to maximise species-richness of grassland habitats and to encourage pollinating invertebrates. A single annual cut (removing cuttings) will maintain grassland	Creation and enhancement of existing connective habitats i.e. hedgerows through incorporation of native species of local provenance which provide food sources such as fruit, nuts and nectar. Such species may include hawthorn <i>Crataegus monogyna</i>, blackthorn <i>Prunus spinosa</i>, honeysuckle <i>Lonicera</i>

Avoidance	Minimise	Mitigate	Compensate
Maintaining connectivity of habitats protecting wildlife corridors and maintaining ecosystem resilience.	Pre-works checks are relevant to bats, badger, dormouse, otter, water vole, hedgehogs, brown hare, harvest mouse, common reptiles and amphibians, breeding birds and INNS. This will include pre-works inspections of T2 and T4 to confirm absence of roosting bats. Pre-works inspections of the Nant y Ffyllon, Nant Lluest-wen, Nant y Castell and Nant Sychbant will also be required to confirm the absence of otter, immediately prior to commencement of works. Additionally, a pre-construction survey of the footprint of the Site and a suitably sized area will be conducted to ascertain any new water vole habitats within the Site and to gain an up-to-date picture of locations of water vole populations immediately prior to construction. Full details will be provided within PMoW documentation.	areas with a taller sward height and increased botanical diversity.	<i>periclymenum</i> and hazel <i>Corylus avellana</i>. This will encourage native invertebrates, including pollinators and night-flying species (enhancing bats foraging opportunities). Compensatory trees (replaced at 3:1) will be planted. Species could include hazel, sessile oak <i>Quercus petraea</i>, and willow <i>Salix spp.</i>
Retain and protect all trees within the Site which have been assessed as having suitability for roosting bats, where possible. Any tree felling or limb removal should avoid those trees identified to have Potential Roost Features (PRF)s in	Present a Toolbox Talk (TBT) to contractors at the start of works to describe the biodiversity issues associated with the Site and the measures to be taken on Site to avoid/minimise impacts on these receptors.	Install brash and log piles as artificial hibernacula. Piles of vegetation will provide suitable egg-laying sites for reptiles. These will also provide refuge/hibernation opportunities for species such as	Install bat and bird boxes on trees within the Site to provide additional refuge for bat and bird species. Bat boxes should be provided at a 2:1 ratio to those roosting opportunities lost or damaged. Lost PRFs can also be compensated for

Avoidance	Minimise	Mitigate	Compensate
the first instance. These trees are highlighted in Figure 8H-5 of this report and full information can be found in the PEA (WSP, 2025 ^a) and combined bat survey reports (WSP, 2025 ^c).		dormouse, hedgehog, reptiles and amphibians. Brash and log piles can comprise felled vegetation resulting from the Proposed Development.	through manual creation of PRFs in retained trees.
Avoidance of habitat removal during ecologically sensitive periods. Avoid carrying out vegetation clearance within the breeding bird season where possible (considered as between March – August inclusive). Precautionary restrictions for working in locations where Schedule 1 of the WCA bird nests may be present (e.g. restrictions to movement of vehicles within access roads in woodlands to the south, where there is potential for nests, should a breeding raptor nest be recorded ahead of works). Avoid removal/dismantling of potential refugia/hibernacula during the reptile hibernation season. The reptile hibernation season is considered as between October to March inclusive. Avoid working within sensitive periods for water vole within suitable habitats in the north of the Site. To achieve this, works within	Consider storage of construction materials and cut vegetation. Materials that could be used by sheltering animals will not be stored adjacent to potentially suitable habitat, to ensure mammals, reptiles and amphibians do not move onto the construction site.	Incorporation of features into the Proposed Development design to mitigate against bird collision risk with the proposed OHL. E.g., micro-siting OHL route to avoid known bird commuting routes, use of bird flight diverters on the OHL to improve visibility for birds and reduce collision events and habitat management under OHL route to discourage sensitive species.	Consideration of long term management of habitat adjacent to Nant y Ffyllon, Nant Lluest-wen, Nant y Castell and Nant Sychbant should be considered to create an un-managed vegetative buffer along the banks at least 5m from the bank. This should include fencing to exclude livestock to reduce the impact of poaching of the banks and would provide additional cover and resting opportunities for otter using the watercourses Consideration of provision of standing waterbodies to provide an additional foraging and resting resource for otter in the wider landscape.



Avoidance	Minimise	Mitigate	Compensate
habitats suitable to support water vole should be carried out between 15 th February to 15 th April. The Proposed Development is also anticipated to avoid night-time working.			

5 NET BENEFIT FOR BIODIVERSITY

- 5.1.1 NBB in Wales is a qualitative approach that emphasises the consideration of biodiversity and wider ecosystem benefits early in the design process, hence utilising the ‘stepwise approach’. The onus is placed on not only delivering an overall improvement in biodiversity but also promoting ecosystem resilience.
- 5.1.2 Although the Welsh assessment does not utilise a metric, demonstrating an overall net benefit is often quantifiable. The Welsh approach aims to demonstrate an increase in ecosystem resilience; this is difficult to quantify as ecosystems are complex and dynamic. This is where the Welsh Government and NRW have developed the DECCA framework (see Section 1.7), which is utilised for a better understanding of aspects of ecosystem resilience.
- 5.1.3 The construction of the Proposed Development will result small-scale and mostly temporary habitat loss to make way the installation of OHL masts. This is proposed to be achieved through ‘micro-siting’ or precise placement of OHL poles. Furthermore, where required, clearance of habitat will be temporary wherever possible. Permanent removal of trees is proposed at one location within the UGC tree felling area to facilitate the UGC works.
- 5.1.4 Habitat compensation at the relevant ratio (as described in Section 3) will ensure that habitats are replaced appropriately and according to their importance for biodiversity and ecosystem resilience. This may be achieved by direct replacement of the same habitat type or by replacement with a higher ecological value habitat. It is understood that these ratios can be achieved within the footprint of the Proposed Development design. This is owing to the small areas of proposed habitat clearance required to enable the Proposed Development. Habitat replacement and all other mitigation is anticipated to be carried out on-Site. Buffers on sensitive ecological features have been set out to avoid impacting protected species and habitats.
- 5.1.5 The Proposed Development demonstrates a proactive consideration for biodiversity and the wider ecosystem throughout the design process. Where impacts to biodiversity were predicted, following the application of avoidance measures and measures to minimise impacts, mitigation was implemented, and compensation provided. The measures aim to increase ecosystem resilience could be categorised into six types of mitigation/compensation and are summarised in **Table 5-1**. Each measure’s contribution to ecosystem resilience is also discussed using the DECCA Framework.

Table 5-1– Mitigation and compensation measures and their contribution to ecosystem resilience

Mitigation/compensation measure	Contribution to the DECCA Framework				
	Diversity	Extent	Condition	Connectivity	Adaptability to change
Strengthening of existing habitats e.g., utilisation of species-rich grassland mixes/plugs of local provenance, implementing a sensitive mowing strategy to maximise species-richness of grassland habitats, incorporating native species into existing hedgerows to encourage native invertebrates including pollinators, strengthening hedgerows through incorporating native species and creating scrub margins and removal of undesirable plant species (including INNS) across the Site.	These measures will increase diversity by providing a higher number of ecological niche opportunities within the Site.	These measures will increase the extent of habitats which are of high biodiversity value within the Site.	These measures will improve the condition of the Site by establishing higher quality habitats, implementing a sensitive mowing strategy, removing undesirable plant species and replacing these with native species of local provenance.	Measures such as strengthening hedgerows and other boundary habitats will improve connectivity and enhance corridors for wildlife. Enhanced biodiversity of grasslands will contribute to invertebrate corridors. Creating scrub margins along boundary features will create refuge opportunities for species such as reptiles, thereby improving commutability of the Site for such species. Improved connectivity will improve population connectivity and dispersal for a range of protected and/or notable species, as well as ensuring continued access to potential	The improved ecological diversity, condition and connectivity of the habitats within the Site created by these measures will improve its resilience to climate change, pollution and other external factors.

Mitigation/compensation measure	Contribution to the DECCA Framework				
	Diversity	Extent	Condition	Connectivity	Adaptability to change
				foraging/nesting habitats within and around the Site.	
Turf translocation of temporarily removed habitats , e.g., grassland habitats and woodland understory.	Botanical diversity of turf will be maintained during translocation.	Extent of habitat will remain unchanged as a result of turf translocation.	Condition of habitat will remain unchanged as a result of turf translocation and future monitoring (where remedial actions will be proposed, if required – Section 6).	Connectivity of habitats will be unaffected by turf translocation.	Maintaining the botanical diversity, extent and condition of turf will help to maintain the Site's resilience to climate change, pollution and other external factors.
Creation of new habitat to exceed the agreed ratio to habitats lost , e.g., compensatory tree and hedgerow planting (3:1 ratio).	These measures have the potential to increase tree diversity by providing a higher number of ecological niche opportunities within the Site.	These measures will increase the extent of trees within the Site.	-	Planting new trees has the potential to improve connectivity between existing habitats within the Site.	The potential for improved ecological diversity, extent, and connectivity by planting compensatory trees within the Site will improve its resilience to climate change, pollution and other external factors.
Creation of opportunities for wildlife using artificial measures e.g., providing	These measures will increase	Certain species will benefit from	-	Measures such as fencing off areas will	The improved ecological diversity,

Mitigation/compensation measure	Contribution to the DECCA Framework				
	Diversity	Extent	Condition	Connectivity	Adaptability to change
artificial hibernacula and piles of vegetation for egg-laying reptiles, installing bat and bird boxes and invertebrate hotels and fencing off areas to create undisturbed areas for nature such as for otters and nesting birds along Afon Llan.	diversity by providing a higher number of ecological niche opportunities within the Site.	increased roosting opportunities within the Site such as bats and birds.		provide undisturbed wildlife corridors for species such as otter along the Site boundary and within the wider area.	extent and connectivity of the Site created by these measures will improve its resilience to climate change, pollution and other external factors.
Avoidance of ecologically sensitive features , e.g. through the use of work exclusion buffer zones or avoidance of tree removal.	Ecological diversity will be maintained by protecting ecologically sensitive features.	Extent of ecologically sensitive features will remain unchanged through establishing work exclusion buffer zones.	Condition of ecologically sensitive features will remain unchanged through establishing work exclusion buffer zones.	Connectivity of ecologically sensitive features will remain unchanged through establishing work exclusion buffer zones.	Maintaining the diversity, extent, condition and connectivity of ecologically sensitive features will help to maintain the Site's resilience to climate change, pollution and other external factors.
Implementing measures which mitigate against bird collision risk with the proposed OHL e.g., micro-siting OHL route to avoid known bird commuting routes, use of bird flight diverters on the OHL to improve visibility for birds and reduce collision events and habitat management under OHL route to discourage sensitive species.	These measures will maintain diversity by preventing bird mortality through collision with OHL.	-	-	These measures will maintain connectivity by avoiding important bird commuting routes.	These measures will work to maintain ornithological diversity through reducing mortalities. They will also support in maintaining existing important commuting routes which transect

Mitigation/compensation measure	Contribution to the DECCA Framework				
	Diversity	Extent	Condition	Connectivity	Adaptability to change
					the Site. Thereby maintaining bird populations' resilience to climate change, pollution and other external factors.

6 FUTURE MANAGEMENT AND MONITORING

- 6.1.1 To ensure the Proposed Development delivers NBB and ecosystem resilience, it will be necessary to undertake future management and monitoring. This should be undertaken during each phase of the development i.e., construction and operation.
- 6.1.2 A Conservation Plan will be produced for the Proposed Development. Details within the Conservation Plan will be finalised following discussion and agreement with the Local Planning Authority (LPA). This will detail management and maintenance measures for the habitats created and long-term monitoring of relevant species. These measures will be inclusive of:
- A management and monitoring plan for maintaining the newly enhanced, species-rich grassland parcels.
 - Specific management plans such be in place for each habitat type proposed for turf translocation i.e., purple moor-grass and rush pastures, acid grassland, woodland ground flora.
 - A management and monitoring plan for maintaining AWI parcels.
 - Connective habitat maintenance, e.g., future management of enhanced hedgerows and tree lines.
 - A low intensity, cutting regime along retained and created hedgerows and other interface scrub habitats, allowing long grass to provide cover for reptile species during summer months.
 - Long term maintenance of compensatory measures for protected and notable species, e.g., maintenance of bat and bird boxes/artificially created features and hibernacula.
 - Post-construction monitoring of bats, water vole and birds.
- 6.1.3 The Conservation Plan should identify the vision and objective for the Site and any relevant mitigation areas. It should include a clear timetable and management commitments and remedial actions over a 5-year period.
- 6.1.4 It is understood that habitat management will be carried out at years 1, 3 and 5 of the 5-year period. The monitoring of establishing habitats should include a condition assessment, including the presence of negative and positive indicator species, and any remedial actions (e.g. removal of INNS or undesirable species).
- 6.1.5 Post-construction monitoring will determine the efficacy of mitigation measures and help to identify mitigation improvements or changes where necessary. Regular reviews of the Conservation Plan, in collaboration with NRW and the LPA, will be required to assess its success and to make alterations where necessary.
- 6.1.6 In addition to this, a report outlining the 'Principles of a Conservation Plan for Water Vole' (WSP,2025^f) will be set out separately and will include conservation measures, management and monitoring specific to water vole within the Site.
- 6.1.7 The implementation of the above measures will help to ensure the delivery of NBB and ecosystem resilience in the long-term.

7 CONCLUSION

- 7.1.1 In conclusion, the Proposed Development demonstrates a proactive consideration for biodiversity and the wider ecosystem throughout the design process. Where impacts to biodiversity were predicted, following the application of avoidance measures and measures to minimise impacts, mitigation was implemented, and compensation provided. The measures aiming to increase ecosystem resilience could be categorised into six types of types of mitigation/compensation comprising; strengthening of existing habitats; turf translocations of temporarily removed habitats; creation of new habitats to exceed the agreed ratio to habitats lost; creation of opportunities for wildlife using artificial measures; avoidance of ecologically sensitive features; and implementing measures which mitigate against bird collision risk with the proposed OHL.
- 7.1.2 By following the approach, as laid out within this report, the Proposed Development will have the opportunity to fulfil its intention in creating the proposed grid connection, whilst also providing an enhanced area for biodiversity. The measures discussed will lead to an overall NBB and improve ecosystem resilience.

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9 FIGURES

Figure 8H-1 – Site Location

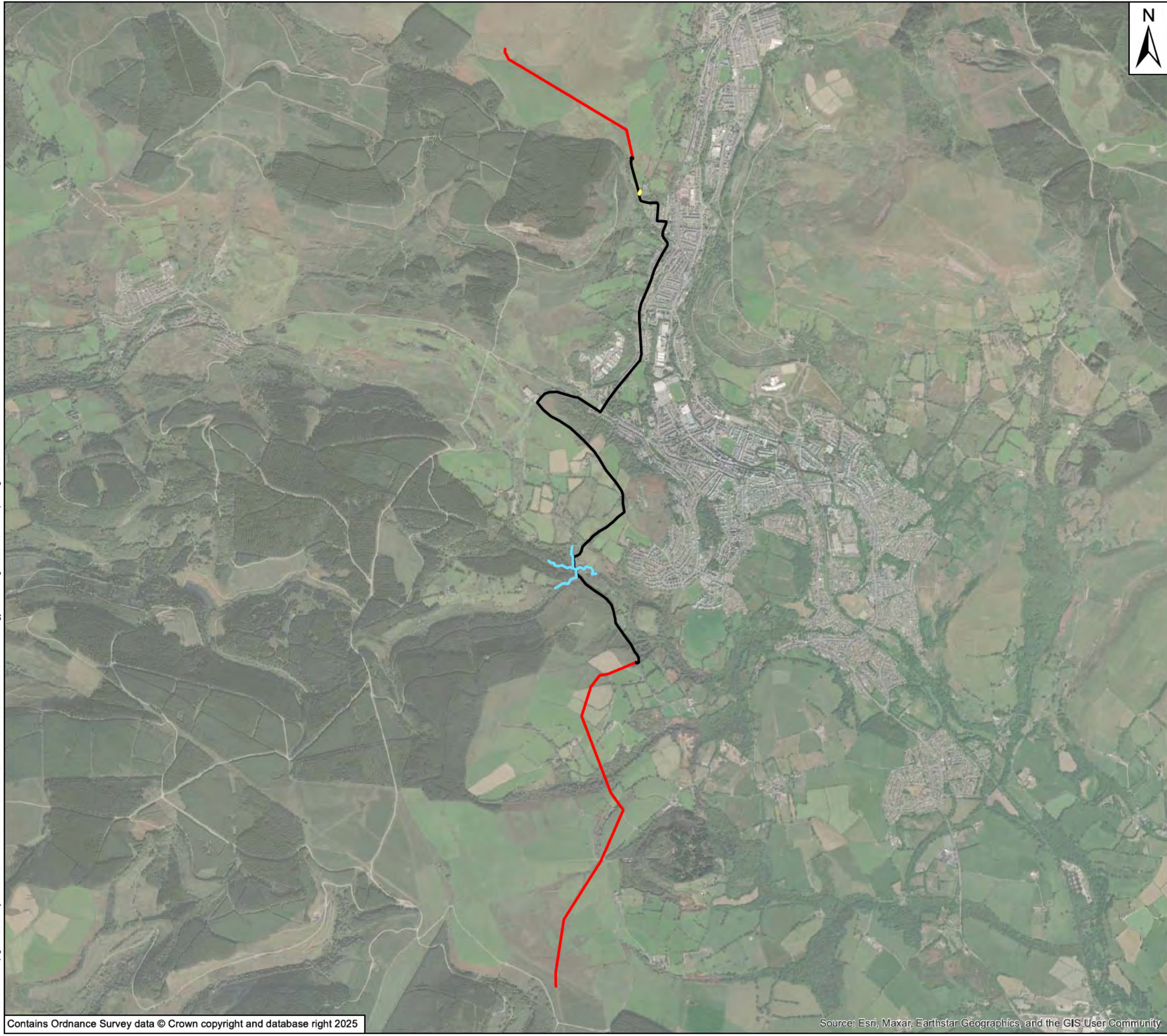
Figure 8H-2 – Phase 1 Habitat Results

Figure 8H-3 – Priority Habitats and Ancient Woodlands within the Site

Figure 8H-4 – SINCs within the Site

Figure 8H-5 – Trees with Bat Roosting Suitability

Figure 8H-6 – Mitigation and Enhancement Plan



Legend

- Site - Overhead Line (OHL) proposed route
- Underground Cable (UGC) proposed route
- UGC tree felling area
- Temporary impact to Nant Sychbant

0 0.5 1 Kilometers

Client:

PENNANT WALTERS

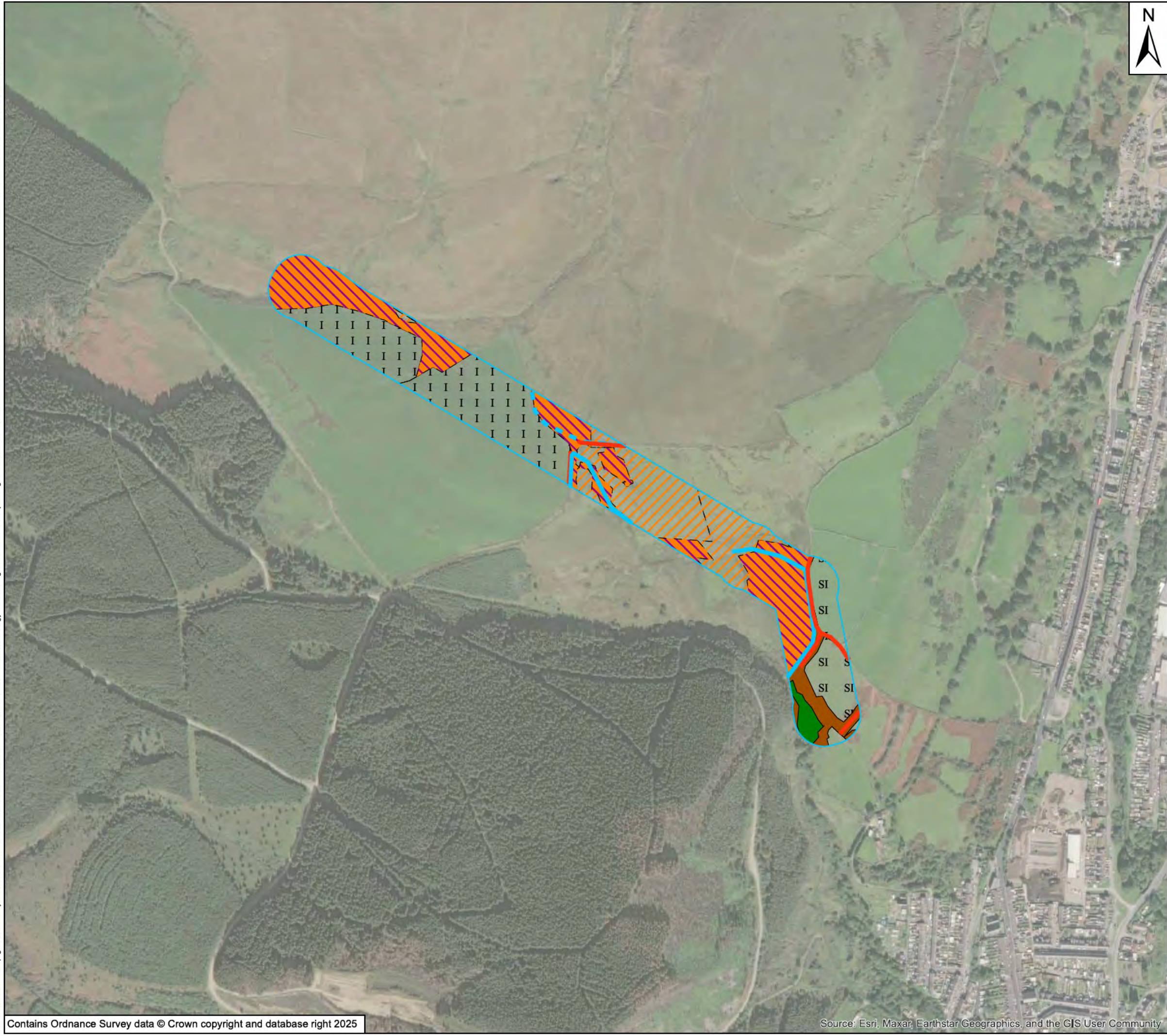
Project:

FOEL TRAWSNANT
NBB REPORT

Title

SITE LOCATION

Drawing No:	Figure 8H-1	Drawn:	AM
Date:	8/4/2025	Checked:	GH
Scale:	25,722 @ A3	Approved:	JB



Legend

PEA Survey Area

Phase 1 Habitat Classification

Broadleaved woodland - semi-natural

Acid grassland - semi-improved

Improved grassland

Marsh/marshy grassland

Poor semi-improved grassland

Bracken - continuous

Running water

Wall

Dry ditch

0100200

m

Client:

PENNANT WALTERS

Project:

FOEL TRAWSNANT
NBB REPORT

Title

PHASE 1 HABITAT RESULTS

Drawing No:

Figure 8H-2

Date:

7/1/2025

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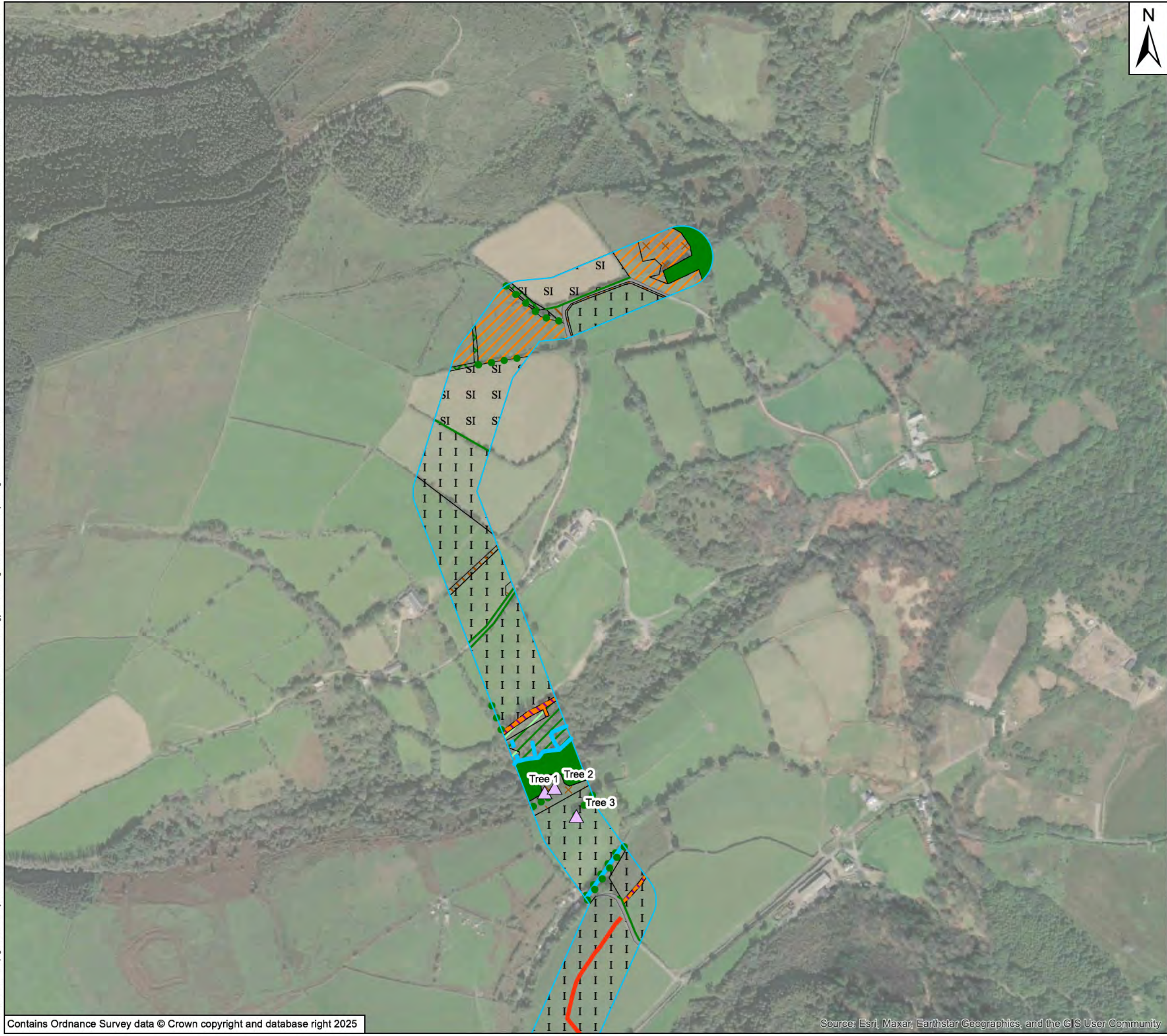
LT

Checked:

AM

Approved:

GH



Legend

- PEA Survey Area
- Phase 1 Habitat Classification**
 - Broadleaved woodland - semi-natural
 - Broadleaved woodland - plantation
 - Coniferous woodland - plantation
 - Scrub - dense/continuous
 - Acid grassland - semi-improved
 - Improved grassland
 - Marsh/marshy grassland
 - Poor semi-improved grassland
 - Bracken - scattered
 - Other tall herb and fern - ruderal
 - Hard standing
 - Broadleaved Parkland/scattered trees
 - Running water
 - Intact hedge - species-poor
 - Wall
 - Dry ditch
 - Broad-Leaved Parkland/scattered trees
- Trees with Bat Roosting Suitability**
 - PRF

0 100 200 m

Client:

PENNANT WALTERS

Project:

FOEL TRAWSNANT
NBB REPORT

Title:

PHASE 1 HABITAT RESULTS

Drawing No:	Figure 8H-2	Drawn:	LT
Date:	7/1/2025	Checked:	AM
Scale:	5,910 @ A3	Approved:	GH



Legend

PEA Survey Area

Phase 1 Habitat Classification

- Broadleaved woodland - semi-natural
- Scrub - dense/continuous
- Scrub - scattered
- Improved grassland
- Marsh/marshy grassland
- Poor semi-improved grassland
- Bracken - scattered
- Hard standing
- Broadleaved Parkland/scattered trees
- Running water
- Intact hedge - species-poor
- Wall
- Dry ditch
- Broad-Leaved Parkland/scattered trees

0 100 200 m

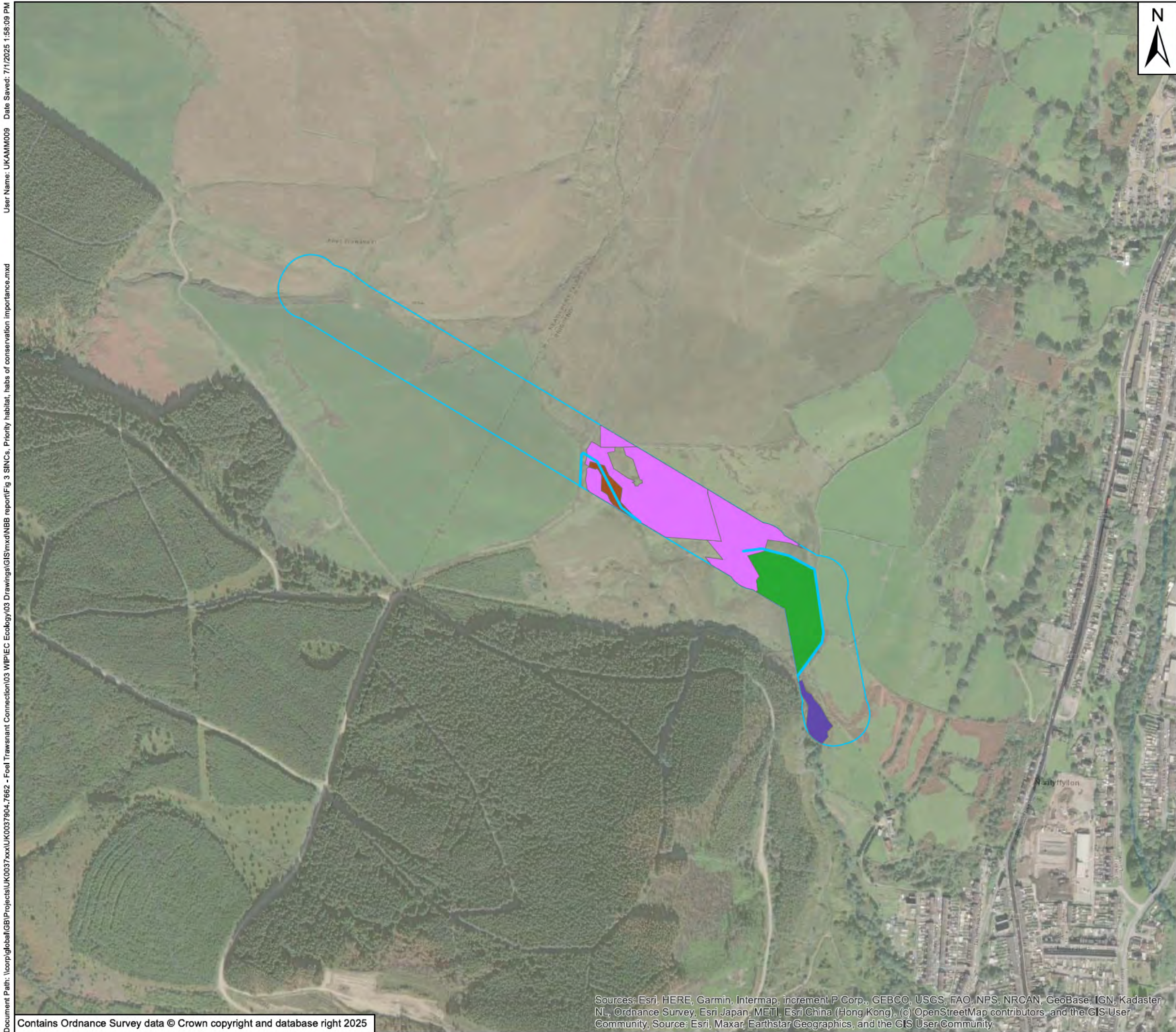
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Client: PENNANT WALTERS

Project: FOEL TRAWSNANT NBB REPORT

Title: PHASE 1 HABITAT RESULTS

Drawing No:	Figure 8H-2	Drawn:	LT
Date:	7/1/2025	Checked:	AM
Scale:	5,660 @ A3	Approved:	GH



Legend



PEA Survey Area

Priority Habitats



Lowland dry acid grassland



Lowland fen



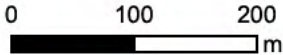
Purple moor-grass and rush pasture



Upland oakwoods



Rivers



Client:

PENNANT WALTERS

Project:

FOEL TRAWSNANT

Title

PRIORITY HABITATS AND
ANCIENT WOODLAND MAP

Drawing No: Figure 8H-3

Drawn: FK

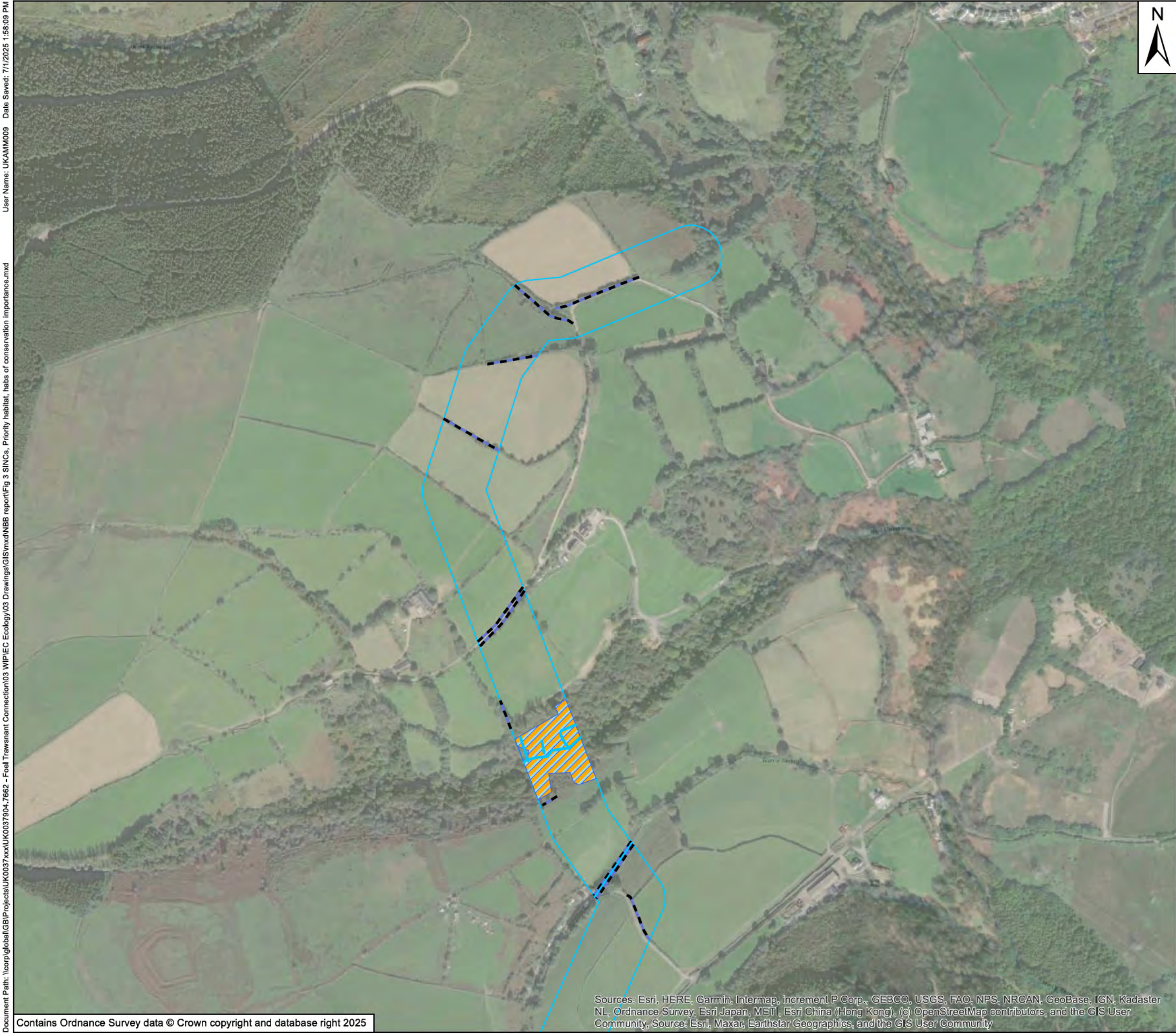
Date: 7/1/2025

Checked: AM

Scale: 6,150 @ A3

Approved: GH

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



N

0100200

m

PEA Survey Area

Lowland mixed deciduous woodland

Hedgerows

Rivers

Ancient Semi-Natural woodland

0

100

200

m

Client:

PENNANT WALTERS

Project:

FOEL TRAWSNANT

Title

PRIORITY HABITATS AND ANCIENT WOODLAND MAP

Drawing No:

Figure 8H-3

Date:

7/1/2025

Scale:

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Drawn:

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Checked:

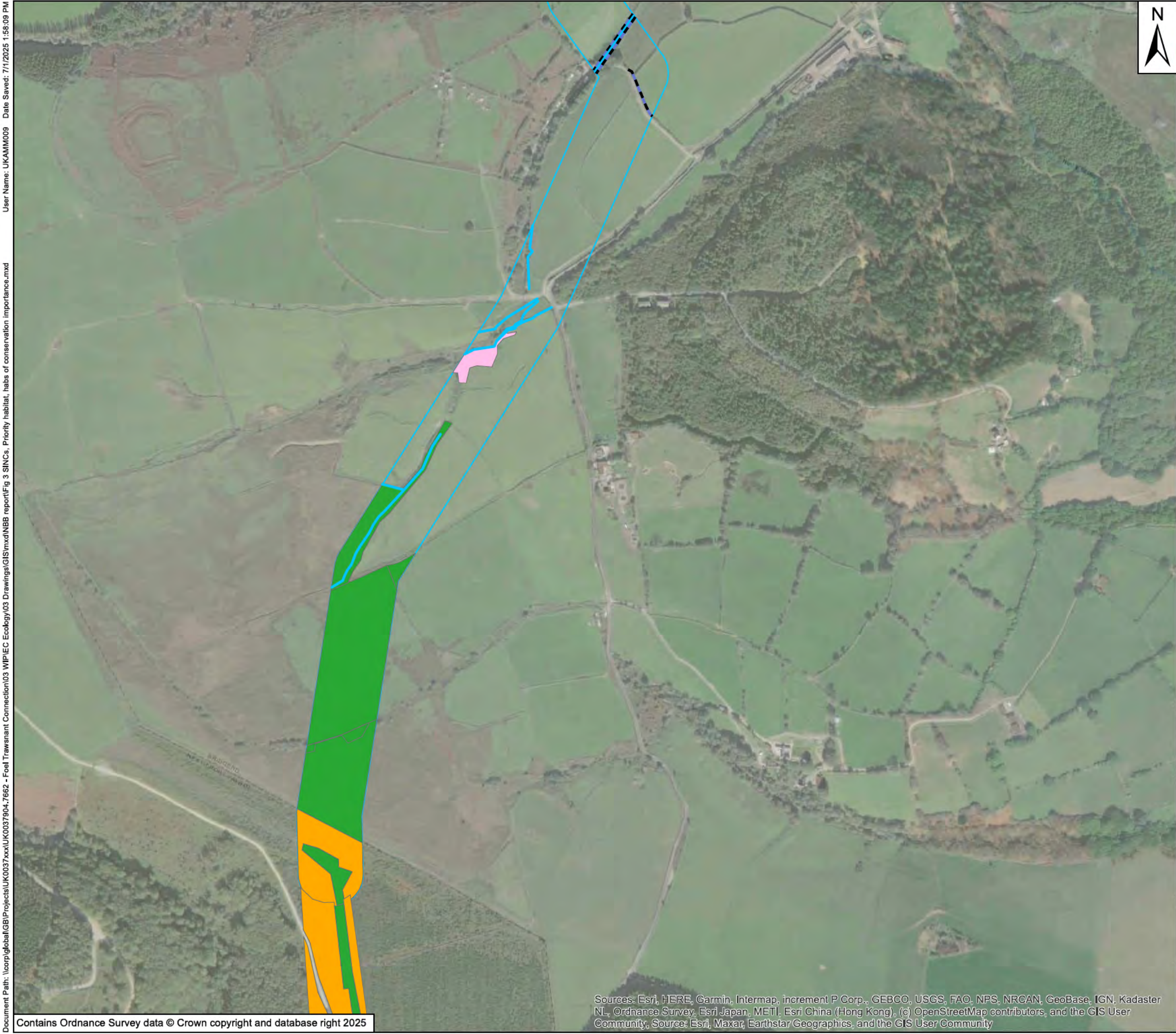
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Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

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Legend



PEA Survey Area

Priority Habitats



Wet woodland



Lowland mixed deciduous woodland



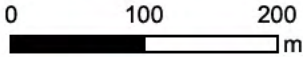
Purple moor-grass and rush pasture



Hedgerows



Rivers



Client:

PENNANT WALTERS

Project:

FOEL TRAWSNANT

Title

PRIORITY HABITATS AND
ANCIENT WOODLAND MAP

Drawing No: Figure 8H-3

Drawn: FK

Date: 7/1/2025

Checked: AM

Scale: 5,670 @ A3

Approved: GH

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Legend

PEA Survey

Sites of Importance for Nature Conservation (SINCS)

0100200

m

wsp

Client:

PENNANT WALTERS

Project:

FOEL TRAWSNANT
NBB REPORT

Title:

SINCS WITHIN THE SITE

Drawing No:

Figure 8H-4

Date:

6/26/2025

Scale:

6,150 @ A3

Drawn:

AM

Checked:

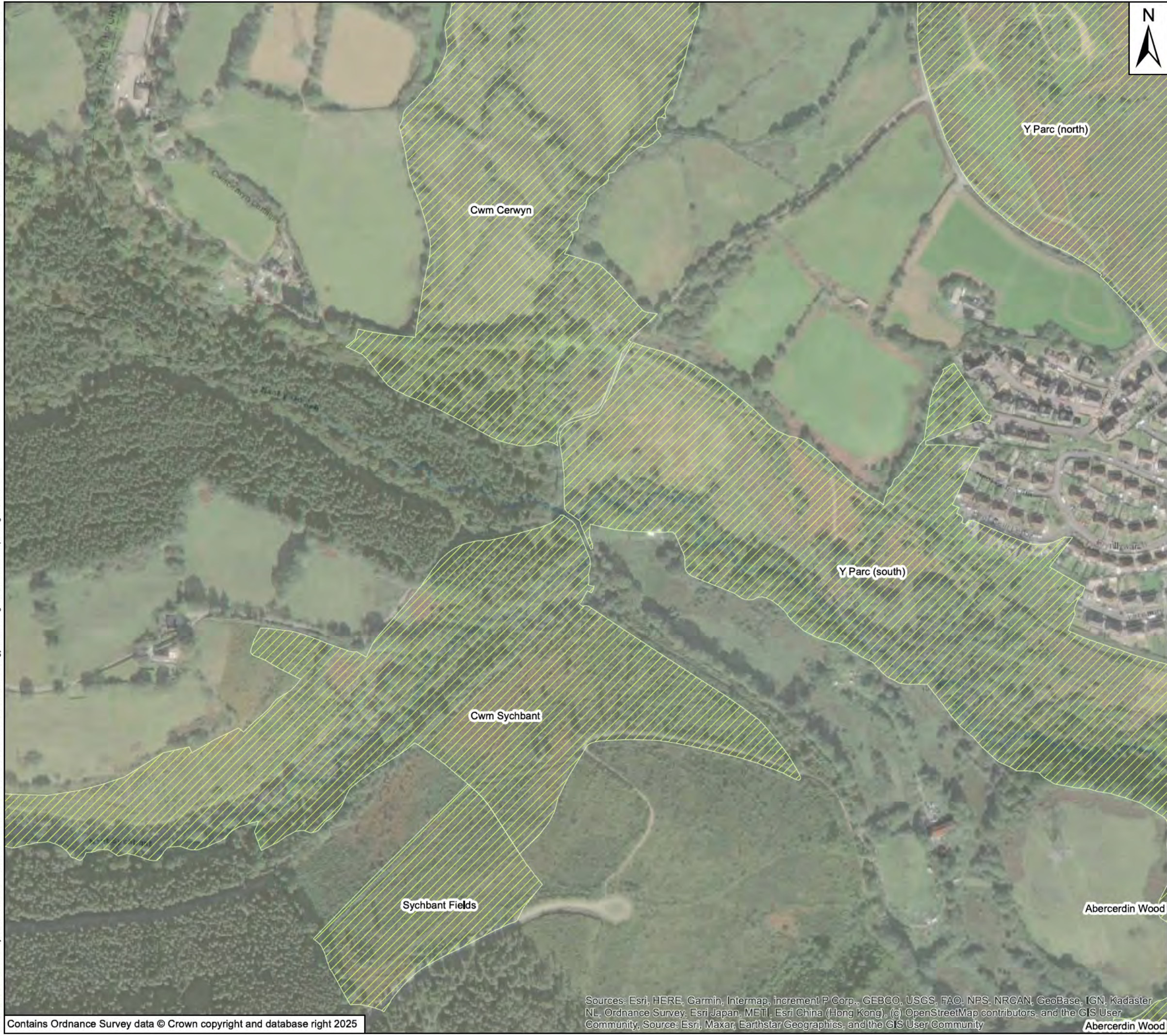
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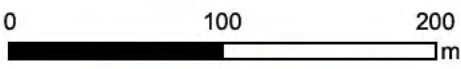
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Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

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Legend
 Sites of Importance for Nature Conservation (SINCs)





Client:

PENNANT WALTERS

Project:

FOEL TRAWSNANT
NBB REPORT

Title:

SINCS WITHIN THE SITE

Drawing No:

Figure 8H-4

Date:

6/26/2025

Scale:

3,550 @ A3

Drawn:

AM

Checked:

ES

Approved:

GH

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

Abercerdin Wood



Legend

PEA Survey Area

Sites of Importance for Nature Conservation (SINCs)

0 100 200 m

Client:

PENNANT WALTERS

Project:

FOEL TRAWSNANT
NBB REPORT

Title:

SINCS WITHIN THE SITE

Drawing No: **Figure 8H-4**

Date: **6/26/2025**

Scale: **5,910 @ A3**

Drawn: **AM**

Checked: **ES**

Approved: **GH**

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Client: **PENNANT WALTERS**

Project: **FOEL TRAWSNANT
NBB REPORT**

Title

SINCS WITHIN THE SITE

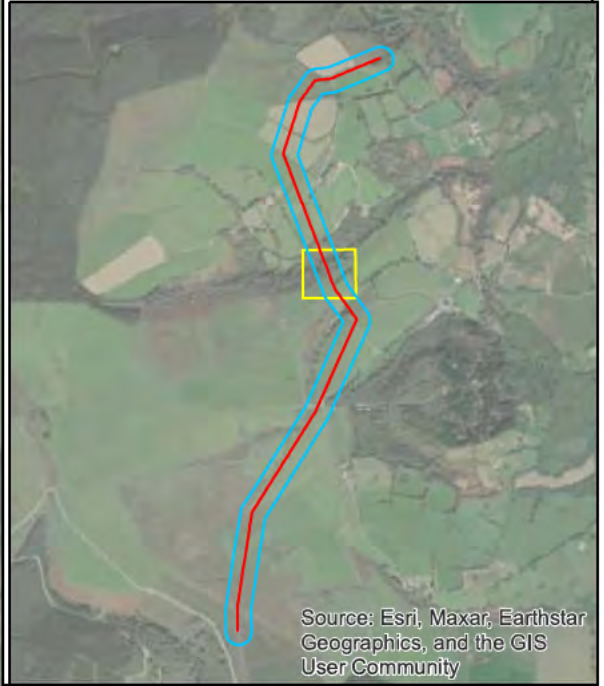
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Scale:	5,660 @ A3	Approved:	GH

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community. Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Legend

- Site
- PEA Survey Area
- Trees with bat roosting suitability**
 - △ None
 - ▲ PRF-I



Client:	PENNANT WALTERS		
Project:	FOEL TRAWSNANT NBB REPORT		
Title:	TREES WITH BAT ROOSTING SUITABILITY		
Drawing No:	Figure 8H-5	Drawn:	AM
Date:	6/26/2025	Checked:	ES
Scale:	972 @ A3	Approved:	GH



Legend

- Site - Overhead Line (OHL) proposed route
- Underground Cable (UGC) proposed route
- 5m work exclusion buffer on sensitive ecological features

Sensitive Ecological Feature

- Otter commuting corridor
- Water vole likely absence
- Water vole potential presence - working methods to be followed (see Principles of Water vole Conservation report)
- Bat commuting corridor
- Species-rich acid grassland/purple moor grass and rush pastures
- Species-rich grassland
- New Tree Lines

Enhancement Areas - to enhance into:

- Species-rich acid grassland/purple moor grass and rush pastures
- Species-rich grassland
- New Tree Lines

0 100 200 m



Client:	PENNANT WALTERS		
Project:	FOEL TRAWSNANT NBB REPORT		
Title	MITIGATION AND ENHANCEMENT PLAN		
Drawing No:	Figure 8H-6	Drawn:	AM
Date:	8/4/2025	Checked:	ES
Scale:	6,150 @ A3	Approved:	GH



N

Legend

— Underground Cable (UGC) proposed route

5m work exclusion buffer on sensitive ecological features

30m work exclusion buffer on other features

Sensitive Ecological Feature

Otter commuting corridor

Otter evidence type

Potential resting site

Potential resting site - possible footprints

0100200

m

wsp

Client:

PENNANT WALTERS

Project:

FOEL TRAWSNANT
NBB REPORT

Title

MITIGATION AND
ENHANCEMENT PLAN

Drawing No:

Figure 8H-6

Date:

8/4/2025

Scale:

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Drawn:

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Checked:

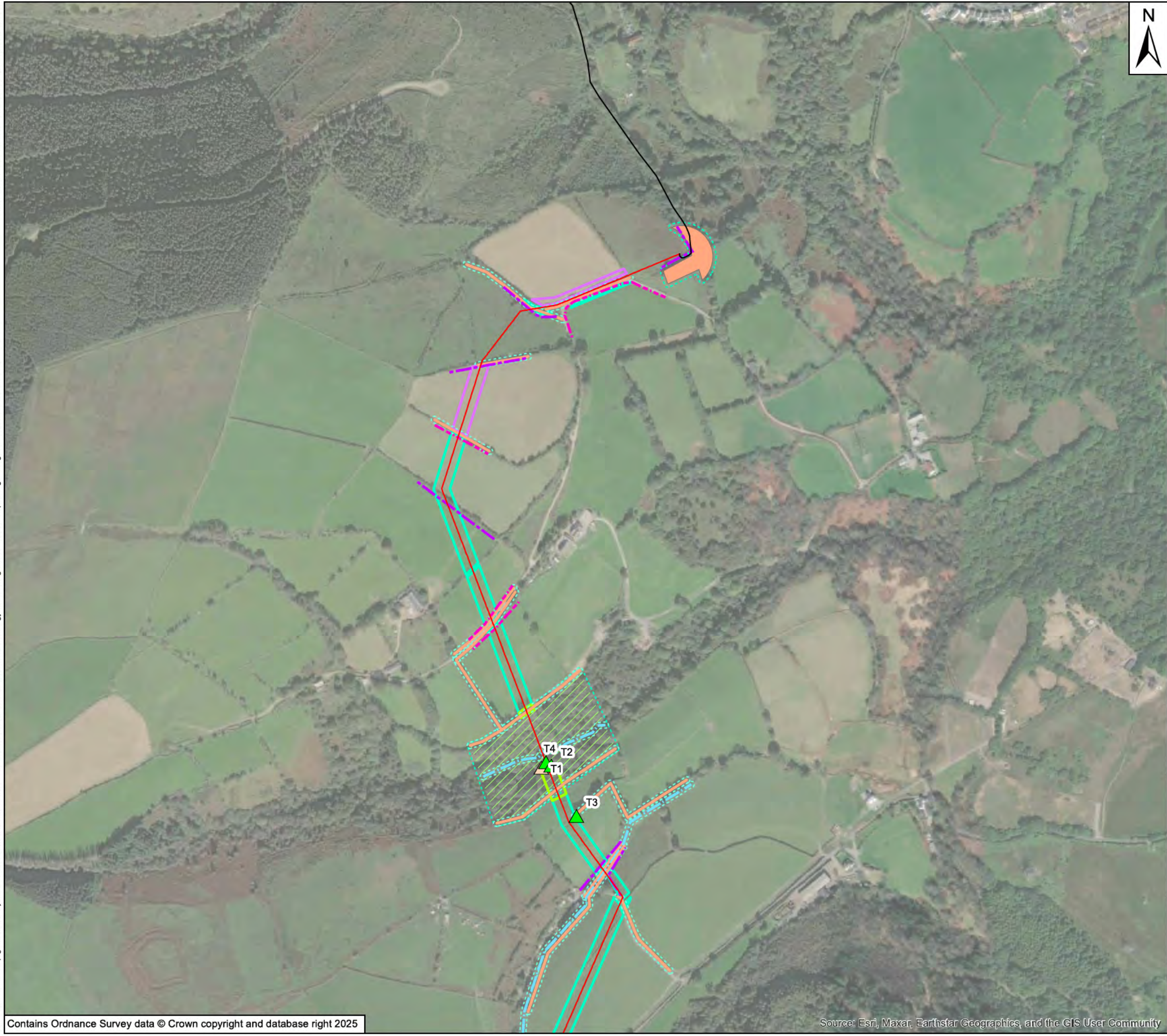
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Approved:

GH

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Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Legend

- Site - Overhead Line (OHL) proposed route
- Underground Cable (UGC) proposed route
- 5m work exclusion buffer on sensitive ecological features

Sensitive Ecological Feature

- Bat commuting corridor
- Otter commuting corridor
- Ancient Woodland
- Bat commuting corridor

Enhancement Areas - to enhance into:

- Species-rich acid grassland/purple moor grass and rush pastures
- Species-rich grassland
- Tree planting area
- New Tree Lines
- New Hedgerows

Suitability of trees with bat roosting potential

- None
- PRF-I

0 100 200 m

Client:

PENNANT WALTERS

Project:

FOEL TRAWSNANT
NBB REPORT

Title

MITIGATION AND
ENHANCEMENT PLAN

Drawing No:	Figure 8H-6	Drawn:	AM
Date:	8/4/2025	Checked:	ES
Scale:	5,910 @ A3	Approved:	GH



Legend

- Site - Overhead Line (OHL) proposed route
- 5m work exclusion buffer on sensitive ecological features
- Sensitive Ecological Feature**
 - Bat commuting corridor
 - Otter commuting corridor
 - Bat commuting corridor
- Enhancement Areas - to enhance into:**
 - Purple moor grass and rush pastures
 - Species-rich acid grassland/purple moor grass and rush pastures
 - Species-rich grassland
 - New Tree Lines

0 100 200 m

Client:

PENNANT WALTERS

Project:

FOEL TRAWSNANT
NBB REPORT

Title

MITIGATION AND
ENHANCEMENT PLAN

Drawing No:	Figure 8H-6	Drawn:	AM
Date:	8/4/2025	Checked:	ES
Scale:	5,660 @ A3	Approved:	GH

Appendix A

RELEVANT LEGISLATION AND PLANNING POLICY

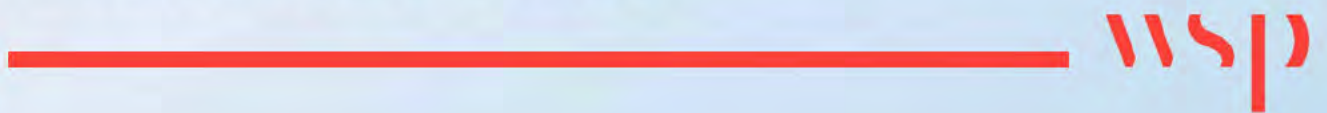


Table A-1 – Descriptions of relevant legislation and planning policy

Legislation/policy	Overview
The Environment (Wales) Act 2016	The Environment (Wales) Act 2016 replaced the existing biodiversity duty (in the Natural Environment and Rural Communities Act 2006) which required public authorities to have a regard to conserving biodiversity. The new Section 6 duty takes this further, requiring all public authorities, when carrying out their functions in Wales, to seek to “maintain and enhance biodiversity” where it is within the proper exercise of their functions. In doing so, public authorities must also seek to “promote the resilience of ecosystems”. This was introduced to plan and manage Wales’ natural resources in a sustainable and joined-up way and is intended to work alongside the Wellbeing of Future Generations Act 2015.
The Wellbeing of Future Generations Act 2015	The Wellbeing of Future Generations Act 2015 requires national government, local government, local health boards and other specified public bodies to carry out sustainable development and work towards objectives that contribute to seven wellbeing goals. Sustainable development in the Act means “the process of improving the economic, social, environmental and cultural wellbeing of Wales by taking action, in accordance with the sustainable development principle (i.e. not compromising the ability of future generations to meet their needs), aimed at achieving the well-being goals”.
Nature Recovery Action Plan Wales (NRAP) – the Biodiversity Strategy for Wales, Part 1: Our Strategy for Nature (2015) and Part 2: Nature Recovery Action Plan (2020 – 2021)	The NRAP complements The Well-being of Future Generations (Wales) Act 2015 and the Environment Act (Wales) 2016. The Plan sets out how the United Nations Environment Programme’s Convention on Biological Diversity’s (CBD) Strategic Plan for Biodiversity (and the associated Aichi Biodiversity Targets for 2011-20 in Wales) is addressed in Wales. The ambition of the plan is ‘To reverse the decline in biodiversity, for its intrinsic value, and to ensure lasting benefits to society’. The NRAP is split into three parts. Part 1: Our Strategy for Nature, sets out the commitment to reversing the loss of biodiversity in Wales, and the objectives for action, these objectives are listed below: ■ Engage and support participation and understanding to embed biodiversity throughout decision making at all levels. ■ Safeguard species and habitats of principal importance and improve their management. ■ Increase the resilience of our natural environment by restoring degraded habitats and habitat creation. ■ Tackle key pressures on species and habitats. ■ Improve our evidence, understanding and monitoring. ■ Put in place a framework of governance and support for delivery. Part 2: Our Action Plan set out those actions which had been specifically identified to meet our objectives to reverse the decline of biodiversity. Part 3: The Nature Recovery Framework sets out the governance and partnerships involved in nature recovery in Wales, and the relationships between them.
Planning Policy Wales, 2024	NBB in association with development is encouraged by PPW (2024).

	It states 'By protecting, maintaining and enhancing biodiversity, increasing the resilience of ecosystems and our natural environment more generally, it will be possible to future proof economic assets in response to the challenges presented by the climate emergency, to promote low carbon and appropriate resource choices which address the causes of climate change and to provide cost effective ecosystems services such as clean air and water.'
Future Wales – The National Plan 2040	Future Wales – the National Plan 2040 is a national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities. The plan contains Policy 9 – Resilient Ecological Networks and Green Infrastructure, a high bar strategic planning system. Policy 9 seeks "To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure". The Welsh Government now requires strategic action to safeguard ecological networks and secure biodiversity enhancement.
Welsh Government's Chief Planner Letter on Biodiversity Enhancements	In 2019, the Welsh Government's Chief Planner issued a letter to the Heads of Planning to set out how biodiversity enhancements should be secured as part of a development proposal. The letter stated that development applications which do not propose biodiversity enhancements will be refused unless they include other significant material considerations. The letter reiterated the importance of incorporating biodiversity enhancements into development proposals at the earliest possibility and into local development policies. It also stated that a net benefit for biodiversity should be proportional to the extent and impact of a development and should contribute to a bigger, better, more joined up approach to a resilient and biodiverse ecological network in Wales.
Swansea Council Adopted Local Development Plan (LDP) (2010-2025), with particular reference to: ■ ER 6 Designated Sites of Ecological Importance; ■ ER 8 Habitats and Species; and ■ ER 9 Ecological Networks and Features of Importance for Biodiversity.	The Swansea LDP states the following in relation to Biodiversity: ER 6: 'Development will not be permitted that would result in a likely significant adverse effect on the integrity of sites of international or national nature conservation importance, except in the circumstances specified in relevant legislation.' ER 8: 'Development proposals that would have a significant adverse effect on the resilience of protected habitats and species will only be permitted'...in specified circumstances as listed within the LDP. ER 9: Development proposals will be expected to maintain, protect and enhance ecological networks and features of importance for biodiversity. Particular importance will be given to maintaining and enhancing the connectivity of ecological networks which enable the dispersal and functioning of protected and priority species.
Swansea Council Supplementary Planning Guidance (SPG): Biodiversity and Development (2021)	This document provides guidance based on the biodiversity chapters of the LDP to provide guidance and clarity on ensuring that development within Swansea maintains and enhances the County's biodiversity and delivers long term ecosystem resilience. It states that 'all proposals should follow the Stepwise Approach' to ensure that biodiversity is considered at every stage of the development process. It

	also provides a 'framework to demonstrate that proposals have responded to a robust ecological understanding of a site, and that appropriate ecological mitigation, compensation, enhancement and aftercare will be provided'.
Swansea Local Biodiversity Strategy and Action Plan (2005).	Promoting Swansea's natural environment (2005) is working 'to protect, manage, enhance and promote Swansea's outstanding natural environment and biodiversity'



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