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Appendix 8K
Principles of a Conservation Plan for Water Vole

PRINCIPLES OF A CONSERVATION PLAN FOR WATER VOLE

DATE:	05 August 2025	**CONFIDENTIALITY:**	Public
SUBJECT:	Principles of a Conservation Plan for Water Vole		
PROJECT:	Foel Trawsnant Grid Connection	**AUTHOR:**	Amber Martin [redacted]
CHECKED:	Gabrielle Horup [redacted]	**APPROVED:**	Janine Burnham [redacted]

INTRODUCTION

Project background

WSP UK Ltd (WSP) 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 the counties of Bridgend and Neath Port Talbot in South Wales, west of Maesteg. To support this application, WSP was commissioned to produce a technical note covering the principles of a conservation plan for water vole *Arvicola amphibius*.

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.

With regards to ecology, it has generally not been necessary to consider the UGC section, as the UGC will be located beneath roads and is not considered to affect ecological receptors. There are two locations which are exceptions to this; one location within the UGC boundary crosses the watercourse Nant Sychbant where there will be a requirement for the instalment of a temporary dam, and one location where localised and small-scale tree felling is required to enable the works. Neither location is set within habitat that is suitable for supporting water vole and will not be considered further in this report.

Ecological background

Habitat suitable to support water vole and evidence of water vole presence was recorded within the boundary of the OHL route, hereafter referred to as the 'Site', during a suite of ecological surveys which commenced in 2024 in support of the Proposed Development. These are discussed in the Ecological Baseline Data section and form a basis for the conservation measures set out in this technical report.

Consultation

WSP issued a draft Environmental Impact Assessment (EIA) on behalf of the client in March 2025 (WSP, 2025b). With regards to water vole, the following measures were included:

- Working under a Constructional Environmental Management Plan (CEMP) to reduce disturbance to water vole resulting from constructional activities.

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- A pre-construction survey to ascertain the presence of any new water vole habitats within the Site prior to works commencing, and supervision of works by a suitability experienced Ecological Clerk of Works (ECoW).
- Any impact on confirmed water vole habitat will be subject to a conservation licence application to Natural Resources Wales (NRW).
- The production and adherence to an appropriate Conservation Plan in consultation with the Local Planning Authority (LPA). This will incorporate long-term management and monitoring of the habitats present within the Site to ensure long-term protection measures for water vole, as well as maintenance and enhancement of habitats.

Following submission, NRW responded with the following further measures:

- A minimum work exclusion buffer of 5m should be demarcated around sensitive watercourses that have suitability to support water vole to protect both the watercourse and the adjoining habitat. This should be indicated on a relevant drawing/plan; and
- Submission of the principles of a Conservation Plan for water vole with the final EIA.

Brief

In response to the above consultation, WSP were commissioned by Pennant Walters to produce a Technical Note outlining the Principles of a Conservation Plan for Water Vole. The Technical Note will provide high-level, general principles for conservation of water vole during construction and post-construction. This will include the following:

- A summary of water vole surveys undertaken to date;
- Site management and ecological oversight during construction to maintain shelter and foraging resources for water vole. Where required, potential restrictions on construction activities during sensitive times of year, such as during breeding;
- Minimum buffers from construction activities (5m work exclusion buffers) to protect watercourses and associated habitat identified for supporting water vole (to be marked on a plan);
- Management of the potential risks from increased human presence and pollution;
- Maintenance or improvement of water quality and water levels during and post construction; and
- Post construction monitoring of water vole populations.

This Technical Note is considered to be a high-level outline of general principles only in order to support the Ecology Chapter in the Environmental Statement (ES). It will be necessary to expand on these principles in detail in a ‘Conservation Plan’, which will be produced following the determination of the planning application.

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ECOLOGICAL BASELINE DATA

Initial habitat assessment

In May 2024, a Preliminary Ecological Appraisal (PEA) of the Site (CSA Environmental, 2024a) was carried out. A UK Habitat Classification (UKHab) survey identified habitats suitable to support water vole in the form of purple moor-grass *Molinia caerulea* and rush pastures which were present in southern most and northern most ends of the Site. A latrine site, confirming water vole presence, was identified within the northern parcel during the survey. It was recommended that a targeted water vole survey was carried out within the two areas of suitable habitat to confirm presence and population distribution of the species and enable assessment of the potential scale of impacts to water vole as a result of the Proposed Development.

Targeted water vole surveys

In June and September 2024, targeted water vole surveys were carried out (CSA Environmental, 2024b). The surveys involved a habitat assessment and a detailed search for water vole field signs along watercourses which ran through previously identified suitable habitat. Three watercourses were identified in the north of the Site; Watercourse A, A.1 and A.2 (as shown in **Figure 8K-1**), whilst one watercourse was identified in the south; Watercourse B[1].

Additional evidence of water vole presence, in the form a second latrine, was identified in a similar location to the latrine identified in May 2024. Additional records of latrines comprised one on the southern bank of Watercourse A and one adjacent to Watercourse A.1. Feeding remains were found on the northern bank of Watercourse A. Whilst no burrows were identified along these northern watercourses, likely due to the bank face substrate (which was predominately comprising cobble and gravel, presenting difficulty to burrowing), several runs and potential burrows were found within the adjoining purple moor-grass tussocks, which provided a dense thatch of vegetation cover for shelter. No evidence of water vole presence was identified in association with Watercourse A.2.

Owing to the confirmation of water vole presence within Watercourse A, A.1 and associated habitats, a second visit was carried out in September 2024. This survey identified lower levels of evidence of water vole presence. One latrine and nearby feeding remains were identified centrally within the adjoining parcel of purple moor-grass and rush pasture. No further evidence was found in association with any of the watercourses during this visit.

No evidence of water vole was identified during the visit to Watercourse B. It was considered that water vole are likely absent due to poor habitat suitability and lack of survey evidence.

[1] As water voles were later considered likely absent from Watercourse B, this is not shown on Figure 8K-1.

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Overall, the surveys confirmed that Watercourses A and A.1 supported water vole, as well as the adjoining parcel of purple moor-grass. It was assessed that the populations associated with these watercourses were at a low relative population density due to the limited number of latrines identified. Water vole were considered likely absent from Watercourse A.2 and B.

Subsequent habitat assessment

In September 2024, a Phase 1 habitat survey was carried out of the Site in support of a PEA (WSP, 2025b). This supported the findings of the CSA Environmental surveys and identified suitable habitat within the same locations described in the CSA Environmental PEA. The WSP PEA took prior survey data into account and concluded that the Proposed Development could result in potential negative implications to water vole and their habitat within the Site.

It was recommended that impacts to watercourses and habitats identified as suitable to support water vole should be avoided wherever practicable and works should be carried out following environmental best practice to avoid impacts to river habitat. Where avoidance of suitable habitats is not feasible, it was recommended that a conservation licence should be sought from NRW in order to carry out works associated with the Proposed Development.

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IMPLICATIONS OF THE PROPOSED DEVELOPMENT

Legislative protection

Water voles are protected from killing and injury and disturbance in their places of rest or shelter, and their places of rest or shelter are protected from damage, destruction or obstruction under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) (WCA). Activities that would otherwise constitute an offence under this legislation may be licensed by NRW for certain purposes.

Water voles are also listed as Priority species in accordance with Section 7 of the Environment (Wales) Act 2016. Public bodies have an obligation under Section 7 to have regard for these species when carrying out their functions.

Implications to water vole

Temporary removal of habitat suitable for supporting water vole will be required to support the Proposed Development during the installation of OHL poles. The installation of the OHL poles will involve temporary loss to habitats during wooden pole placement and digging of a trench proposed to be between 0.6m – 1.5m wide (dependent upon the final design specification), widening to 1.5m closer to the surface. Habitats will be immediately reinstated following the completion of the trench digging.

Since the water vole surveys carried out in June and September 2024, the design of the Proposed Development has been adjusted to relocate the OHL poles northward, away from Watercourse A and A.1. This has limited the extent of removal of highly sensitive habitat, however, removal of the purple moor-grass and rush pasture associated with Watercourse A, A.1 and A.2 is still required to support the Proposed Development. The Proposed Development is also anticipated to be located in proximity (not closer than 5m) to Watercourse A.2 where water vole is considered likely absent.

Considering this, the Proposed Development presents the following risks to water vole:

- Disturbance to water voles and/or their resting places.
- Loss of suitable habitat.
- Indirect effects to river habitat such as pollution run-off.

As there have been no water vole burrows identified within the Site and watercourses are not anticipated to be impacted directly, a NRW conservation licence for water vole has been deemed not currently required. This requirement will be reviewed following pre-construction surveys.

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CONSTRUCTION PHASE MITIGATION

OVERVIEW

In the first instance, avoidance measures should be followed to avoid impact to water vole resulting from the Proposed Development. Where habitats suitable to support water vole cannot be avoided, then further mitigation measures are set out below. These measures have been considered following the 'step-wise approach' as outlined in policy (Planning Policy Wales (PPW) (Welsh Government, 2024); firstly avoiding, then minimising, mitigating and, as a last resort, compensating for adverse impacts on the environment that occur as part of a development. These will be set out in the Conservation Plan and will include details in line with the information below. The measures below have also been considered in accordance with good practice guidance (Dean, M. *et al*., 2016).

AVOIDANCE

The Proposed Development has been designed to avoid habitat suitable for water vole where possible, particularly within watercourses where evidence of water vole presence has been identified, i.e., Watercourse A and A.1. Following on from the targeted water vole surveys, the Proposed Development design was adjusted to relocate the OHL poles northward, away from Watercourse A and A.1.

In addition to the above, pre-defined work exclusion buffers on ecologically sensitive features will be set out during construction to support avoidance of various ecological features and 'micro-siting' of OHL masts. These will be applied to Watercourse A and A.1 and will also include Watercourse A.2, to prevent impacts to water quality via works related pollution or impacts to water levels. In the case of water vole, these will comprise 5m work exclusion buffers surrounding Watercourse A, A.1, A.2 and where possible the associated parcel of the purple moor-grass and rush pasture. These work exclusion buffers are set out within **Figure 8K-1,** with water vole suitable habitats and work exclusion buffers shown on Page 1 of this Figure.

Complete avoidance of the purple moor-grass and rush pasture will not be possible, and OHL masts are proposed for installation in a least three locations within this parcel. These are proposed to the north of locations where water vole presence has been confirmed, however, owing to the suitability of the habitats, presence of water vole cannot be ruled out. For this reason, further mitigation measures are set out below.

MINIMISE

Where the installation of OHL masts is required within habitat suitable for water vole, Precautionary Methods of Working (PMoW) will be followed to minimise potential for impacting water vole and/or their habitat. These measures will be secured within a CEMP and adhered to during construction.

Timings/avoidance of sensitive periods

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Works within habitat suitable to support water vole should be carried out between 15th February – 15th April, as this is the least vulnerable period for water voles in the unlikely event that they should they be displaced as a result of the disturbance caused by the Proposed Development.

Management of pollution and water quality

Works will follow environmental best practice, as outlined in the current best practice guidelines regarding working in or near water (NetRegs, 2018) and those outlined by the Construction Industry Research and Information Association guidance (CIRIA, 2015). In addition to working outside of buffers for ecological sensitivity wherever possible, the following minimum standards must be adhered to prevent ecological impacts beyond the Site:

- Measures must be taken to prevent dust and other emissions from construction impacting land beyond the Site.
- Chemicals and fuels must be stored in secure containers located away from watercourses or water bodies. Spill kits must be available.
- Excavations must be covered or securely fenced (with no potential access points beneath fencing) when the construction site is closed (e.g. overnight) to prevent entrapment of animals.
- Noise and vibration must be controlled and kept to the minimum necessary.

As the OHL masts will be micro-sited away from Watercourses A, A.1 and A.2, with no direct impact on the watercourses, there is no further requirement for maintenance or improvement of water quality and water levels during and post construction.

Management of human disturbance

Temporary water vole resistant fencing will be installed adjacent to the Site boundary within suitable purple moor-grass and rush pasture habitat, as shown in **Figure 8K-1**. This fencing will be installed with the aim to protect Watercourses A, A.1 and A.2 from construction and human related disturbance and prevent water vole displacement during the period of works. Whilst the fencing cannot be relied upon to exclude water voles entirely, it will limit foraging and commuting activity within the parcel of purple moor-grass and rush pasture which falls within the Site whilst the works are being carried out. Fencing will be removed postconstruction and will not limit water vole access to the parcel in the long-term.

Pre-construction survey

A pre-construction survey should be carried out where works directly impact suitable habitat for water vole, i.e., during the installation of OHL masts within suitable purple moor-grass and rush pasture. The pre-construction survey area should include the footprint of the Site and a suitably sized area (250m radius based on the Zone of Influence (ZoI) of disturbance impacts). It will be conducted to ascertain whether any new areas of water vole habitat have established within the Site and to provide updated information on

locations of water vole populations. The check should be carried out by a suitably qualified Ecological Clerk of Works (ECoW). This should be carried out immediately prior to any works being undertaken.

Should presence of water vole burrows be identified during this check, works will be paused, and a licence will be sought from NRW in order to continue the works.

MITIGATION

Translocation of temporarily removed habitat

Where removal of suitable water vole habitat is required to support the Proposed Development, clearance of habitat will be temporary. This will be achieved using turf translocation which will maintain the species diversity of the temporarily removed habitats. It will result in no long-term loss of suitable habitat to support water vole.

COMPENSATION

Compensatory measures 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. It is not considered that compensatory measures will be required as long as the mitigation measures are followed. The DECCA framework, outlined within policy (PPW) (Welsh Government, 2024), requires planning authorities to take account of and promote the resilience of ecosystems when assessing planning applications. Long-term measures for ecological enhancement have been set out in following section.

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LONG-TERM MEASURES

Long-term ecological enhancement measures will secure the conservation of the water vole population within the Site and provide suitable habitat of enhanced resilience. These measures are designed to support both the current and future populations of water vole within the Site.

Creation of suitable habitat

Habitat creation is proposed through the enhancement of habitats with low ecological value 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 of species present in adjacent parcels to create new areas of purple moor-grass and rush pasture where appropriate.

These enhancements will benefit several species, however, with relevance to water vole it is proposed that the existing parcel of purple moor-grass and rush pasture adjacent to Watercourse A, A.1 and A.2 will be extended into an area of poor semi-improved grassland through habitat creation and enhancement. This will increase the area of suitable commuting and foraging habitat for water vole in the long-term.

Enhanced habitats will be subject to long-term management to maintain botanical diversity, potentially including the use of stock-proof fencing to allow establishment of enhanced parcels and protection from grazing livestock.

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MONITORING

As part of the long-term measures which will be set out in the Conservation Plan, habitats suitable for water vole will be subject to post-construction monitoring following the completion of the Proposed Development. This is to ensure that populations are not negatively affected by anticipated low levels of increased human presence and pollution associated with the Proposed Development once it is in operation.

A five-year period of monitoring will be set out in the Conservation Plan. This will comprise of two annual visits to Watercourse A and A.1 and adjoining suitable habitat including one spring visit and one late summer/early autumn visit. This five-year period will commence in the season following completion of the Proposed Development and re-instatement of the habitats within the Site.

The post-construction monitoring will confirm whether the re-establishment of translocated habitat has been effective and whether water vole are using the habitat enhancement areas.

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CONCLUSION

This Technical Note has set out the principles of a conservation plan for water vole in order to support the Proposed Development, following evidence of water vole presence within the northern section of the Site. These principles set out measures for construction, long-term management, and post-construction monitoring.

This Technical Note is considered to be a high-level outline of general principles only in order to support the Environmental Statement (ES). It will be necessary to expand on these principles in detail in a 'Conservation Plan', which will be produced following the determination of the planning application.

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PROJECT REFERENCES

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FIGURES

Figure 8K-1 (Pages 1 – 4) – Mitigation and Enhancement Plan



N

Legend

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

Sensitive Ecological Feature

- Otter commuting corridor
- Water vole likely absence
- Bat commuting corridor
- Water vole potential presence - working methods to be followed (see Principles of Water vole Conservation report)

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

wsp

Client: PENNANT WALTERS

Project: FOEL TRAWSNANT PRINCIPLES OF A CONSERVATION PLAN FOR WATER VOLE

Title: MITIGATION AND ENHANCEMENT PLAN

Drawing No: Figure 8K-1 | Drawn: AM
Date: 8/4/2025 | Checked: ES
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Legend

- Underground Cable (UGC) proposed route
- 5m work exclusion buffer on sensitive ecological features
- 30m work exclusion buffer on otter features

Sensitive Ecological Feature

- Otter commuting corridor

Otter evidence type

- Potential resting site
- Potential resting site - possible footprints

0 100 200 m

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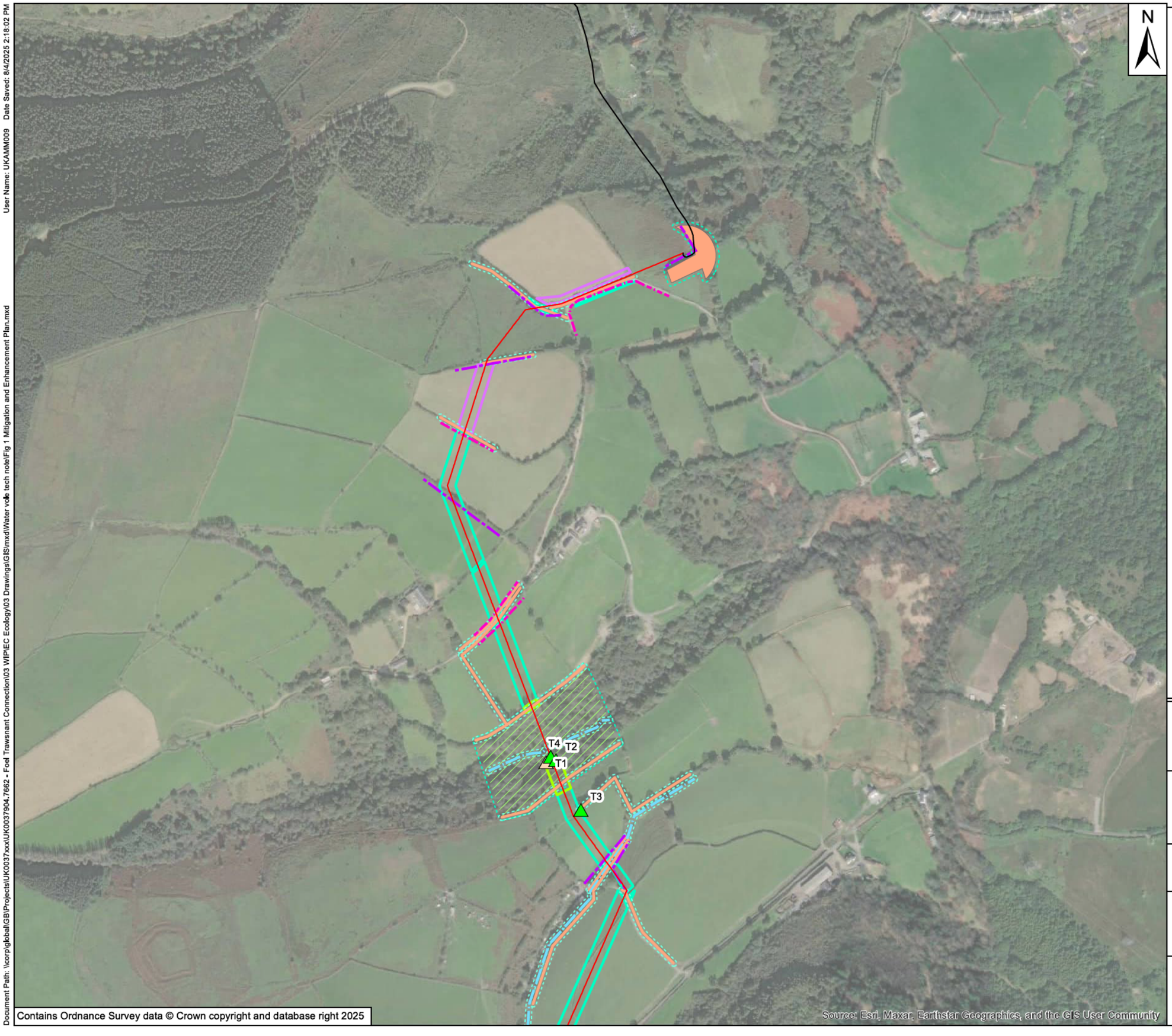
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Title: MITIGATION AND ENHANCEMENT PLAN

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N

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

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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

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