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Appendix 8F
Otter Report

PENNANT WALTERS

FOEL TRAWSNANT GRID CONNECTION

OTTER SURVEY REPORT



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AUGUST 2025

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PENNANT WALTERS

FOEL TRAWSNANT GRID CONNECTION

OTTER SURVEY REPORT

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CONTENTS

1 INTRODUCTION 1

1.1 PROJECT BACKGROUND 1
1.2 ECOLOGICAL BACKGROUND 1
1.3 BRIEF AND OBJECTIVES 2

2 METHODS 3

2.1 OVERVIEW 3
2.2 HABITAT SURVEY 3
2.3 PRESENCE/LIKELY ABSENCE SURVEYS 3
2.4 DATES OF SURVEY 4
2.5 NOTES AND LIMITATIONS 4

3 RESULTS 5

3.1 OVERVIEW 5
3.2 HABITAT SURVEY RESULTS 5
3.3 PRESENCE/LIKELY ABSENCE RESULTS 11

4 DISCUSSION 15

4.1 OVERVIEW 15
4.2 LEGAL COMPLICANCE 15
4.3 PLANNING POLICY COMPLIANCE 16

5 RECOMMENDATIONS 18

5.1 AVOIDANCE AND MITIGATION MEASURES 18
5.2 ECOLOGICAL ENHANCEMENT MEASURES 18

6 CONCLUSION 19

7 REFERENCES 20

7.1 PROJECT REFERENCES 20

7.2 TECHNICAL REFERENCES 20

8 FIGURES 21

TABLES

Table 2-1 - Dates of survey 4

Table 3-1 - Habitat survey results for Watercourses 1-4 6

Table 3-2 - Potential and confirmed otter features identified within Watercourse 4: Nant Sychbant and its tributaries 12

FIGURES

Figure 8F-1 – Site, Watercourse Locations and Survey Results 21

APPENDICES

APPENDIX A

PHOTOGRAPHS

EXECUTIVE SUMMARY

WSP UK Ltd (WSP) was commissioned by Pennant Walters to undertake otter *Lutra lutra* surveys to support the 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 west of Maesteg, in South Wales.

The Proposed Development will 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. Whilst the entire connection will require DNS consent, the requirement is triggered by the OHL section. This report focuses mostly on the OHL route, (the 'Site'), however, the UGC proposed route is considered at the point at which it is proposed to temporarily impact the Nant Sychbant. The impact to Nant Sychbant will enable the installation of the UGC, which will involve installing a temporary dam and laying the cable through an open cut method.

Following the recommendation within the Preliminary Ecological Appraisal (PEA) (WSP, 2025[a]), otter surveys were carried out over four watercourses and their surrounding riparian habitat. These included Watercourse 1: Nant y Ffyllon; Watercourse 2: Nant Lluest-wen; Watercourse 3: Nant y Castell; and Watercourse 4: Nant Sychbant. Surveys were carried out within 200m up and down-stream of the Site/proposed temporary dam location at each of these watercourses to establish whether otter were present or likely absent and make recommendations as to how the Proposed Development should account for these species.

One survey per watercourse was carried out over three dates: 23 April,12 May and 20 June. Suitable habitat for resting, foraging and commuting otter was identified during the survey of Watercourse 4: Nant y Sychbant. An otter slide, evidencing confirmed otter presence, was identified adjacent to a suitable resting site beyond 30m from the proposed temporary dam location. Overall, seven potential and one confirmed resting site were identified along Watercourse 4 and tributaries, however the confirmed resting site was considered at significant distance from the proposed temporary dam location [redacted] to not be at risk of disturbance. No field signs, or potential/confirmed resting sites were identified along Watercourse 1-3. These watercourses were considered suitable for commuting otter, however, there were limited foraging opportunities.

With no confirmed signs of otter presence identified with Watercourse 1, 2 and 3, nor within 30m of the proposed temporary dam location during the survey within Watercourse 4, there was no requirement for further survey such as camera trapping surveillance. However, due to the suitability of the watercourses and adjoining habitat for commuting and resting otter (with foraging suitability within Watercourse 4), it was recommended that suitable habitat for otter should be avoided where possible. Further recommendations are provided in this report, inclusive of avoidance and mitigation measures, and measures to support a Net Benefit for Biodiversity (NBB) for the Proposed Development.

Recommendations within the PEA require that two otter surveys are carried out on relevant watercourses, spread across different seasons. For this reason, this report is considered to be the 'Version 1 (V1)' draft and will act as an appendix and informant to the Environmental Statement (ES) which will be submitted in August 2025. The 'Version 2 (V2)' of this report will be the completed report, reporting on the full suite of surveys. This is due to be issued in September/October 2025.

1 INTRODUCTION

1.1 PROJECT BACKGROUND

1.1.1. 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 Bridgend and Neath Port Talbot Counties in South Wales, west of Maesteg. To support this application, WSP was commissioned to undertake otter *Lutra lutra* surveys of suitable habitats.

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 mostly on the OHL section.

1.1.3. 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. This tree removal is not relevant to or likely to impact otters and therefore is not discussed within this report. However, the UGC also crosses one watercourse, Nant Sychbant, where a temporary dam will be required to enable the installation of the UGC. The temporary dam will enable the laying of a cable using an open cut method, following best environmental practice. For this reason, this watercourse is considered as part of the assessment, in addition to those crossing the OHL route. This is considered as a temporary impact. No additional impacts are anticipated to habitats along the rest of the UGC route.

1.2 ECOLOGICAL BACKGROUND

1.2.1. In September and October 2024, a Preliminary Ecological Appraisal (PEA) was carried out by WSP (WSP, 2025a) of the OHL route, hereafter referred to as the 'Site', as shown on Figure 8F-1. An additional buffer area of 50m around the Site was also surveyed and is hereafter referred to as the 'PEA Survey Area'. This supplemented a CSA Environmental PEA report which was produced in October 2024 (CSA Environmental, 2024a).

1.2.2. As part of the PEA carried out by WSP, a desk study was carried out which identified a total of three records of otter within 2km of the Site within the last 10 years. The nearest otter record was [redacted] section of the Site, near to Nant Cynon. Nant Cynon is a watercourse which was recorded in the vicinity of the Site but was not identified to have hydrological connectivity with any of the watercourses flowing within the Site or PEA Survey Area. It did, however, have functional habitat connectivity to the PEA Survey Area via extensive woodland habitat, which was suitable for terrestrial commuting and resting of otters. The otter record near to Nant Cynon comprised a characteristic otter spraint containing fish bones within connecting woodland parcel. The Phase 1 habitat survey identified suitable habitat for otters within the PEA Survey Area in the form of riparian

habitats including watercourses and adjacent woodland parcels. There was no evidence of otter within the PEA Survey Area and no potential resting sites were identified. However, a thorough search of all watercourses and a buffer appropriate to otter was beyond the scope of the PEA and was therefore not conducted. It was recommended that follow-up otter surveys should be conducted to fully understand the extent to which otters may be using watercourses proposed to be impacted by the Proposed Development. These were recommended to be carried out during different seasons to provide results which are more representative of a full survey year, and to increase the opportunity of identifying otter/signs of otter, should they be present.

1.3 BRIEF AND OBJECTIVES

1.3.1. Pennant Walters commissioned WSP to complete an otter survey in accordance with good practice guidance (Chanin, 2003; and South Wales Otter Trust, 2024) to:

- Establish whether otter were present or likely to be absent from watercourses proposed to be impacted by the Proposed Development; and
- If present, evaluate the importance of the relevant watercourses for otter and make recommendations as to how the Proposed Development should account for these species with respect to legislation, planning and biodiversity policy.

1.3.2. Two versions of this report will be produced. This report is considered to be Version 1 (V1) and will act as an appendix and as an informant to the Environmental Statement (ES) which is due to be submitted in August 2025. The Version 2 (V2) of this report will be the completed report, reporting on the full suite of surveys. This is due to be issued in September/October 2025.

1.3.3. The results of surveys undertaken to date, and subsequent recommendations, are included within this V1 report.

2 METHODS

2.1 OVERVIEW

2.1.1. To establish whether otter were present or likely to be absent from the Site, otter surveys were conducted. The survey methodology followed current good practice guidance (Chanin, 2003; and South Wales Otter Trust, 2024).

2.2 HABITAT SURVEY

2.2.1. An assessment of the habitat suitability for otter was undertaken of all suitable watercourses and associated habitats proposed to be impacted by the Proposed Development, as part of the presence/likely absence surveys in Section 2.3.

2.2.2. These comprised:

- Watercourse 1: Nant y Ffyllon; centred at approx. SS 84654 93233.
- Watercourse 2: Nant Lluest-wen; centred at approx. SS 84510 88904.
- Watercourse 3: Nant y Castell; centred at approx. SS 84629 88725.
- Watercourse 4: Nant Sychbant; centred at approx. SS 84287 90356.

2.2.3. The locations of these watercourses, plus a 200m survey buffer up and downstream either side of the Site or proposed temporary dam location, are shown on Figure 8F-1.

2.2.4. The habitats and features of Watercourses 1-4 were assessed for their suitability to support otter. This included: broad habitat type, bank substrate, vegetation, disturbance level, bank profile, water depth, water speed and bordering land use.

2.3 PRESENCE/LIKELY ABSENCE SURVEYS

2.3.1. Each watercourse was required to be surveyed twice between April – September 2025 in accordance with good practice. At the time of reporting, the first of these surveys has been carried out. The results of the second surveys will be included in Version 2 of this report. Otter surveys can be carried out at any time of year, however surveys were not carried out after a spell of heavy rain as this may have limited the otter field signs available (Chanin, 2003).

2.3.2. Where safe access allowed, the entire length of the watercourses within the Site were subject to a thorough visual inspection of the banks, and up to 50m from the banks, for otter or their field signs. This survey was extended up to 200m up and downstream, where access allowed, and within adjacent woodland parcels.

2.3.3. Field signs for otter include: animals (alive or dead), feeding/prey remains, spraints, other secretions, pathways, slides, footprints, holts and couches. Holts and couches are hereafter collectively referred to as ‘resting sites’. Features that have high potential to be attractive to otter were examined, including bases of large trees, dense vegetation, confluences of watercourses and culverts.

2.3.4. Information was recorded using a handheld device with installed Geographical Information System (GIS) software. This was used to record the location of each field sign or feature, with photographs taken (shown within Appendix A), and details recorded.

2.4 DATES OF SURVEY

2.4.1. The otter surveys were carried out by two members of the Chartered Institute of Ecology and Environmental Management (CIEEM) with experience of carrying out otter surveys.

2.4.2. Survey dates are summarised in Table 2-1 below:

Table 2-1 - Dates of survey

Watercourse	Survey number by date	
	1	2 (Proposed date)
Watercourse 1: Nant y Ffyllon	12th May	9th September
Watercourse 2: Nant Lluest-wen	23rd April	9th September
Watercourse 3: Nant y Castell	12th May	9th September
Watercourse 4: Nant Sychbant	20th June	9th September

2.5 NOTES AND LIMITATIONS

- Terrain surrounding the southern section of Watercourse 1: Nant y Ffyllon was very steep and in some sections the watercourse was inaccessible due to health and safety concerns. This equated to approximately 10% of the watercourse section proposed for survey. Where inaccessible, surveys were conducted from vantage points using binoculars. This was not considered a significant limitation as the majority of the watercourse could be surveyed in detail with no signs of otter identified.
- Approximately 10% of Watercourse 3: Nant y Castell was heavily and densely vegetated and not accessible to survey. This was not considered a significant limitation as the majority of the watercourse could be surveyed in detail with no signs of otter identified.
- Otter surveys can be carried out at any time of year. Guidance suggests that autumn and late winter/early spring are optimal survey periods due to the lower level of vegetation cover and associated improved visibility (South Wales Otter Trust, 2024). However, there is also an advantage to carrying out surveys between May-September due to water levels being less variable (Chanin, 2003). By planning surveys at different times of year, i.e., April, May and September, this accounts for these different considerations and potential environmental variables.

3 RESULTS

3.1 OVERVIEW

3.1.1. Suitable habitat for resting, foraging and commuting otter was identified during the survey of Watercourse 4: Nant y Sychbant. Evidence of confirmed otter presence was identified in the form of an otter slide adjacent to a suitable resting site. There were also several suitable potential resting sites identified along the watercourse and its tributaries within 200m of the Site.

3.1.2. No field signs, or potential/confirmed resting sites were identified whilst surveying Watercourse 1-3. These watercourses were considered suitable for commuting otter, however, there were limited foraging opportunities.

3.1.3. Watercourses 1-3 all lie upstream of watercourses with known fish abundance. There are also no watercourse connections upstream of the Watercourses. This makes it less likely that otters will commute into Watercourses 1-3 from the more suitable downstream habitats but cannot be entirely ruled out.

3.1.4. Furthermore, the adjacent woodland parcels surrounding Watercourse 1, 2 and 4 provide potential habitat for commuting and resting.

3.2 HABITAT SURVEY RESULTS

3.2.1. The results of the habitat survey of Watercourses 1-4 are detailed below in Table 3-1. Photographs are provided in Appendix A

Table 3-1 - Habitat survey results for Watercourses 1-4

	Watercourse 1: Nant y Ffyllon	Watercourse 2: Nant Lluest-wen	Watercourse 3: Nant y Castell	Watercourse 4: Nant Sychbant
Central grid reference	SS 84654 93233 (Start: SS 84461 93353; End: SS 84707 93019)	SS 84510 88904 (Start: SS 84333 88823; End: SS 84688 89005)	SS 84629 88725 (Start: SS 84507 88552; End: SS 84750 88854)	SS 84287 90356 (Start: SS 84168 90176; End: SS 84484 90304) [Tributaries: Nant y Goblyn: Start: SS 84111 90407 Unnamed tributary: Start: SS 84151 90456]
Description	Nant y Ffyllon flows along the edge of a forestry and open fen/purple moor-grass *Molinia caerulea*/marshy grassland and rush pasture and acid grassland habitat. The northern end of the surveyed part of the watercourse was very densely vegetated and formed a part of an areas of 'fen' Priority Habitat. The watercourse at the northern end of the surveyed part of the watercourse was narrow and shallow and had a moderate flow. As the stream flowed southward, the course followed into a steep gully with	Nant y Lluest-wen flows eastward within a parcel of broadleaved woodland in the southern section of the Site. The river flowed at a moderate speed. It had a stone/shingle substrate. The banks were vegetated as per the surrounding woodland habitat. In some sections the banks were solid earth which could be walked on and in other sections the banks comprised a thick mud which was not solid enough to walk over.	Nant y Castell flows north-east within agricultural fields with sheep and lambs grazing. The river itself is bordered by lines of trees and/or bramble *Rubus fruticosus* agg. scrub which shaded the steep and mostly vegetated banks.	Nant Sychbant flows from west to east through mixed woodland habitat. Its tributary Nant y Goblyn flows into Nany Sychbant from the west, whilst an unnamed tributary joins at the same location from the north. The

	Watercourse 1: Nant y Ffyllon	Watercourse 2: Nant Lluest-wen	Watercourse 3: Nant y Castell	Watercourse 4: Nant Sychbant
	dense scrub habitat bordering both sides. At this point the stream widened up to 1.5m wide and had a fast flow. At its most southern extent within the watercourse there were possible signs of iron deposition shown by an orange/rust colouring in the river sediment.		However, there were numerous access locations to the water for sheep. The watercourse was approximately 2m wide with a rocky/shingle substrate and a moderate flow. This watercourse showed signs of potential dredging in order to artificially straighten and revegetate the banks.	northern extent of the unnamed tributary flowed from a culvert. At the time of survey, the river had a fast flow despite the dry spell of weather prior to the survey. The watercourse was very shallow within the unnamed tributary and as little as 1m wide. The watercourse became deeper and wider as it flowed downstream into Nant Sychbant. Fish were observed within the watercourse and its tributary (Nant y Goblyn) including minnow

	Watercourse 1: Nant y Ffyllon	Watercourse 2: Nant Lluest-wen	Watercourse 3: Nant y Castell	Watercourse 4: Nant Sychbant
				Phoxinus phoxinus and stickleback *Gasterosteus aculaeatus.*
% surveyed	90%	100%	90%	100%
Shore/bank	Earth banks	Earth/mud banks	Earth/rock banks	Earth/sand banks
Bordering habitat	In the northern section: fen/purple moor-grass/marshy grassland and rush pasture and acid grassland habitat. In the southern section: dense scrub and broadleaved woodland.	Broadleaved woodland.	Agricultural fields and tree line/scrub.	Mixed woodland. It should be noted that Japanese knotweed *Reynoutria japonica* was recorded within the bordering habitat.
Disturbance	Limited disturbance due to remoteness and limited signs of agricultural activity.	Some localised access to sheep grazing, although most of the woodland is fenced off and therefore disturbance is limited.	Agricultural disturbance including sheep grazing with access to the watercourse.	Human and livestock disturbance was recorded at the western extent of the watercourse, including within tributaries with habitats becoming less disturbed as

	Watercourse 1: Nant y Ffyllon	Watercourse 2: Nant Lluest-wen	Watercourse 3: Nant y Castell	Watercourse 4: Nant Sychbant
				the watercourse flowed downstream towards the east.
Water speed	Moderate in the highly vegetation northern section, and fast as it flows into the steep gully.	Fast.	Moderate.	Fast.
Depth	<0.5m	<0.5m	<0.5m	<0.5m – 1m
Width	0.5m – 1.5m	Up to 4.5m	Approx 2m	1m – 10m
Wider habitat connectivity	Watercourse 1: Nant y Ffyllon flows through a drain network under a residential estate into Afon Llynfi which is a tributary of the River Wye, known to support brown trout *Salmo trutta* and hence known for fishing activity. Otter has been historically identified within this watercourse and provides good foraging opportunities. However, the connectivity is weak due to the highly urban nature and long stretch of underground draining. Habitat connectivity for commuting otter is considered better via the adjacent woodland parcel to the west of the watercourse which has connectivity with Nant Cynon and Afon Afan, both known to historically support otter.	Watercourse 2: Nant y Lluest-wen flows into Nant y Cerdin and then into Afon Llynfi (approx. 2.5km from the Site) which is a tributary of the River Wye, known to support brown trout and hence known for fishing activity. There is no watercourse connection upstream of Watercourse 2: Nant y Lluest-wen.	Watercourse 3: Nant y Castell flows into Nant y Gadlys and then into Afon Llynfi (approx. 2.5km from the Site) which is a tributary of the River Wye, known to support brown trout and hence known for fishing activity. There is no watercourse connection upstream of	Watercourse 4: Sychbant flows into Nant y Cerdin and then into Afon Llynfi (approx. 3km from the Site) which is a tributary of the River Wye, known to support brown trout and hence known for fishing activity. There are no watercourse connections upstream of the

	Watercourse 1: Nant y Ffyllon	Watercourse 2: Nant Lluest-wen	Watercourse 3: Nant y Castell	Watercourse 4: Nant Sychbant
	There is no watercourse connection upstream of Watercourse 1: Nant y Ffyllon.		Watercourse 3: Nant y Castell	unnamed tributary or Nant y Goblyn.
Suitable for otter?	Yes - commuting and resting up within the adjacent woodland habitat.	Yes – commuting and resting up within the adjacent woodland habitat.	Yes – poor commuting habitat.	Yes – resting, commuting and foraging.

3.3 PRESENCE/LIKELY ABSENCE RESULTS

3.3.1. Seven potential and one confirmed resting site were identified within Watercourse 4: Nant Sychbant and its tributaries. The locations of these features are shown on Figure 8F-1, with photographs shown in Appendix A. A description of each feature is provided in Table 3-2.

Table 3-2 - Potential and confirmed otter features identified within Watercourse 4: Nant Sychbant and its tributaries

Feature type/reference	Location	Distance from proposed temporary dam location	Suitability	Description
Resting site (RS)1	Unnamed watercourse	58m northwest	Potential	Located within the bankside. There were no signs or evidence or signs of recent use, but a mammal path was recorded leading to/from river. The watercourse at this location was recorded as very low, less than 10cm deep.
RS2	Nant y Goblyn	80m west	Potential	Located within the earth bank and supported by a root system. There were no signs of evidence, but mammal path was recorded leading to and from the river. Fish were observed in river at this location.
RS3	Nant Sychbant	83m east	Potential	Located within a small cavity within the base of a tree near to the bankside. It was considered as a suitable resting site for a smaller otter. No definitive evidence of otter presence was recorded. A potential otter footprint was recorded but was not confirmed. There was a mammal path leading to and from watercourse/footprint location. Mammal path continues beyond RS4. Fish were observed in river at this location.
RS4	Unnamed watercourse	85m northwest	Potential	Located within the bankside, under a tree root system, providing a large area for potential resting otter. There were no signs or otter presence. The watercourse at this location was recorded as very low, less than 10cm deep.
RS5	Nant Sychbant	154m east	Potential	Located within the bankside. It has suitability for use when water levels are low. There was no evidence of otter presence recorded.
RS6	Nant Sychbant	162m east	Potential	Located within the bankside. It has suitability for use when water levels are low. There was no evidence of otter presence recorded. Furthermore, a

Feature type/reference	Location	Distance from proposed temporary dam location	Suitability	Description
				spider web was recorded over entrance indicating no recent use. Inside the resting site the surface was very smooth.
RS7	[redacted]		Confirmed	Located within the bankside. A definitive otter slide was recorded leading down to watercourse, with a path also leading up to resting site.
RS8	Nant Sychbant	192m east	Potential	Located within the bankside. It has suitability for use when water levels are low. There was no evidence of otter presence recorded.

3.3.2. All of the potential resting sites were located >30m from the location at which the temporary dam is proposed to be installed. The closest potential resting sites to the proposed temporary dam locations were RS1 and RS2, which were 58m northwest and 80m west from the proposed temporary dam location respectively. Whilst beyond 30m from the proposed temporary dam location, it should be noted that a confirmed otter resting site was recorded [redacted] This could be confirmed by the presence of an otter slide leading away from the resting place into the watercourse. The confirmed resting site was considered at significant distance from the proposed temporary dam location [redacted] to not be at risk of disturbance.

3.3.3. To date, surveys within Watercourses 1, 2 and 3 have not identified any signs of otter presence within any of the watercourses. This is prior to the collection of data later in the survey season.

3.3.4. No confirmed resting sites were identified within 30m of the proposed temporary dam location during the visits and therefore there is not considered a requirement for camera trapping surveillance as is detailed in good practice guidance (South Wales Otter Trust, 2024; CIEEM, 2024).

4 DISCUSSION

4.1 OVERVIEW

4.1.1. Otter presence was confirmed within Watercourse 4: Nant Sychbant and its tributaries during the otter surveys. Whilst presence was confirmed beyond 30m from the proposed temporary dam location, the presence of a confirmed resting site suggests that otters are using the watercourse for foraging, commuting and resting activities. It was determined that Watercourse 4: Nant Sychbant had habitats to support resting, commuting and foraging otter.

4.1.2. No signs of otter presence were identified during Watercourses 1, 2 and 3. The surveys indicated that the habitats have suitability for commuting otter. This is due to the suitability of riparian habitats surrounded by woodland and/or open rural habitat. Watercourse 1: Nant y Ffyllon and Watercourse 2: Nant Lluest-wen had more suitability for commuting otter than Watercourse 3: Nant y Castell. This is because Watercourse 3: Nant y Castell was highly disturbed by grazing sheep and lambs with limited woodland cover in the surroundings. Watercourses 1 and 2 also were connected to adjoining woodland parcels which provide suitability for resting otter, although no evidence of this activity was found during the survey.

4.1.3. Foraging opportunities were limited within Watercourses 1,3 and 4 due to their shallow depth. The watercourses may provide some suitable spawning opportunities for fish, and reptiles and amphibians are known to be present within the Site which also provide a food source to otter. However, this is not considered a prime foraging location and is likely only opportunistically used as such. In addition to this, watercourse connections downstream are known to support fish and are likely far more suitable foraging habitat for otter. This makes it less likely that otters will commute into Watercourses 1-3 from the more suitable downstream habitats but cannot be entirely ruled out.

4.1.4. With no confirmed signs of otter presence identified with Watercourse 1, 2 and 3, nor within 30m of the proposed temporary dam location during the survey, there is not considered a requirement for camera trapping surveillance as is detailed in good practice guidance (South Wales Otter Trust, 2024; CIEEM, 2024).

4.1.5. The confirmed resting site which was identified [redacted] of the proposed temporary dam location along Watercourse 4 is considered at significant distance from the proposed temporary dam location ([redacted]) to not be at risk of disturbance.

4.1.6. Otters are protected from killing, injury and disturbance under European and UK legislation; in addition, planning policy affords further protection within the planning system, as described below. A summary of the legislation and planning policy is given in section 4.2 below.

4.1.7. The results of this survey are considered valid for up to two years, after which an updated survey would be required.

4.2 LEGAL COMPLICANCE

4.2.1. Otter are fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) (HMSO, 1981) and Countryside Rights of Way Act 2000 (HMSO, 2000).

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

4.2.3. The European Commission (EC) Habitats Directive and EC Birds Directive is transposed into UK law via the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations (as amended) (HMSO, 2019), commonly referred to as the Habitats Regulations. Otter is listed under Annex IV of the Habitats Directive and therefore requires strict protection, and is known as a European Protected Species (EPS).

4.2.4. Otter are also listed under Annex II of the Habitats Directive and are afforded protection by the establishment of core areas of habitat known as Special Areas of Conservation. This means this species are a relevant consideration in a Habitats Regulations Assessment (HRA).

4.3 PLANNING POLICY COMPLIANCE

4.3.1. At the national level the Planning Policy Wales (PPW) (Welsh Government, 2024) forms the basis for planning system decisions with respect to conserving and enhancing the natural environment, including protected species such as otter.

4.3.2. PPW (Edition 12, 2024) states:

"A Resilient Wales can be supported by protecting and providing sufficient scale, extent, diversity and connectivity within, and between, landscapes and habitats to maintain and enhance biodiversity and the resilience of ecosystems. This support will enable them to withstand the pressures of change, to tackle pollution, to protect and enhance water resources, to protect soils and to enable flood mitigation, the creation of carbon sinks (especially in urban areas), and to promote opportunities for social and economic activity based on valuing and enabling access to the natural, historic and built environment."

4.3.3. The PPW sets out, amongst other points, how at an overview level the 'planning system should contribute to and enhance the national and local environment by:

- *…recognising… the wider benefits of ecosystem services; and*
- *minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures…'.*

4.3.4. A list of principles which local planning authorities should follow when determining planning applications is included in the PPW, and includes the following:

- *'if significant harm resulting from a development cannot be avoided…adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- *…opportunities to incorporate biodiversity in and around developments should be encouraged; and*
- *planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland…unless the need for, and benefits of, the development in that location clearly outweigh the loss…'.*

4.3.5. Mitigation, compensation and enhancement measures are recommended in Section 5 to enable the Proposed Development to be compliant with the above legislation and planning policy.

5 RECOMMENDATIONS

5.1 AVOIDANCE AND MITIGATION MEASURES

5.1.1. Due to the suitability of Watercourse 4 for commuting, foraging and resting otter, and the suitability of Watercourses 1, 2 and 3 for commuting otter, it is recommended that all Watercourses (e.g. Watercourses 1-4) should be avoided during the Proposed Development as far as practicable. This is also inclusive of suitable riparian habitats such as the adjoining woodland parcels to Watercourse 1, 2 and 4, due to their potential suitability for commuting and resting.

5.1.2. Where works directly to Watercourses 1, 2, 3 or 4 are required, it is recommended that a pre-works check is carried out. The pre-works check should include a check of the section of the watercourse proposed to be impacted as well as of adjoining riparian habitat within 50m where it is suitable for resting otter. 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.

5.1.3. As no confirmed otter resting sites been identified within 30m of the proposed temporary dam location during the survey there are no current licencing requirements for otters to allow the Proposed Development. However, should these be identified during further surveys or during the pre-works check, a European Protected Species (EPS) licence for otter may be required.

5.1.4. Furthermore, construction mitigation for the Proposed Development will be fulfilled through a Construction Environmental Management Plan (CEMP), under ecological supervision. The CEMP will include (but not be limited to) night working restrictions, pollution prevention measures, restriction on light spill onto suitable otter habitat, noise barriers and restricted access in order to reduce the disturbance to potential otter.

5.2 ECOLOGICAL ENHANCEMENT MEASURES

5.2.1. Net Benefit for Biodiversity (NBB) in association with development is required by PPW (Edition 12, 2024) and required under Section 6 of Part 1 of the Environment (Wales) Act 2016. The below recommendations aim to comply with a NBB approach, in the way of delivering an overall improvement in biodiversity with the absence of a metric. By engaging with these recommendations in the early stages of the Proposed Development, it is hoped that ecosystem resilience and wider ecosystem benefits can be achieved. This approach will support local authorities in achieving their Section 6 duty to “promote the resilience of ecosystems” when determining planning applications.

- Long term management of habitat adjacent to Watercourses 1, 2, 3 and 4 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; and
- Provision of standing waterbodies to provide an additional foraging and resting resource for otter in the wider landscape.

5.2.2. These measures are detailed in the NBB report (WSP, 2025b), which would describe how the Proposed Development has followed the step-wise approach and would thus lead to an NBB, as well as how the Proposed Development aligns with the DECCA framework. The step-wise approach, and the DECCA framework, are both described in PPW (2024).

6 CONCLUSION

6.1.1. Overall, Watercourses 1-4 all provided suitable commuting habitat for otters, with suitable resting habitat present within the adjoining woodland parcels of Watercourses 1, 2 and 4. Foraging suitability was limited in Watercourses 1, 2 and 3, whilst the identification of a confirmed resting site along Watercourse 4 suggests that otters are using the watercourse for foraging and commuting.

6.1.2. With no confirmed signs of otter presence identified with Watercourse 1, 2 and 3, nor within 30m of proposed temporary dam location (Watercourse 4) during the survey, there is not considered a requirement for camera trapping surveillance as is detailed in good practice guidance (South Wales Otter Trust, 2024; CIEEM, 2024).

6.1.3. The confirmed resting site which was identified [redacted] of the proposed temporary dam location along Watercourse 4 is considered at significant distance from the proposed temporary dam location ([redacted] to not be at risk of disturbance.

6.1.4. Due to the suitability of the watercourses and adjoining habitat for commuting and resting otter (with foraging suitability within Watercourse 4), it is recommended that suitable habitat for otter should be avoided during the Proposed Development.

6.1.5. Where works directly to Watercourses 1, 2, 3 or 4 (and relevant adjoining habitat) are required, it is recommended that a pre-works check is carried out by a suitably qualified ECoW immediately prior to any works being undertaken.

6.1.6. As no confirmed otter resting sites have been identified within 30m of the Site or of the proposed temporary dam location during the survey there are no current licencing requirements for otters to allow the Proposed Development. However, should these be identified during further surveys or during the pre-works check, an EPS licence for otter may be required.

6.1.7. Furthermore, construction mitigation for the Proposed Development will be fulfilled through a CEMP, under ecological supervision in order to reduce the disturbance to potential otter.

6.1.8. Ecological enhancement measures are also recommended to be implemented in order to support the Proposed Development in achieving NBB as is outlined as a requirement in policy.

6.1.9. It should be noted that the results in this report are considered prior to the collection of data later in the survey season and that this report is V1. V2 is anticipated to follow in September/October 2025.

7 REFERENCES

7.1 PROJECT REFERENCES

- CSA Environmental. (2024). Preliminary Ecological Appraisal. Foel Trawsnant Wind Farm. October 2024.
- WSP. (2025[a]). Foel Trawnsant Grid Connection. Preliminary Ecological Appraisal. February 2025.
- WSP. (2025[b]). Foel Trawnsant Grid Connection. Net Benefit for Biodiversity Report. August 2025.

7.2 TECHNICAL REFERENCES

- Chanin, P. (2003). Monitoring the Otter *Lutra lutra*. Conserving Natura 2000 Rivers Monitoring Series No. 10. Peterborough: English Nature.
- Chartered Institute of Ecology and Environmental Management (2024). Article: Do UK Survey Licence for Otter Support Best Practice. March 2024.
- South Wales Otter Trust. (2024). Otter Protection: Best Practice Guidance for Developers, Ecologists and Planning Authorities (UK) Nov24.
- HMSO. (1981). The Wildlife and Countryside Act 1981 (as amended).
- HMSO. (2000). Countryside and Rights of Way (CROW) Act 2000.
- HMSO. (2016). Environment (Wales) Act.
- HMSO. (2019). Conservation of Habitats and Species (Amendment) (EU Exit) Regulations.
- Welsh Government. (2024). Planning Policy Wales (PPW). Edition 12. 2024.

8 FIGURES

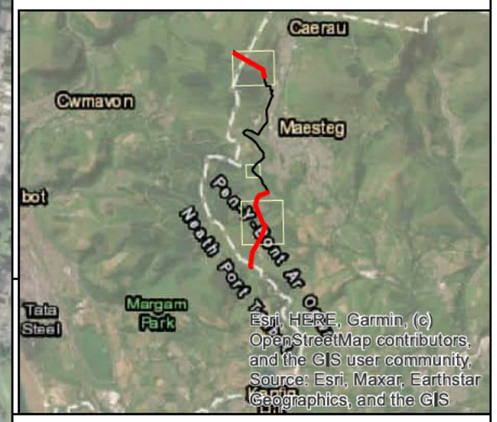
Figure 8F-1 – Site, Watercourse Locations and Survey Results

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N

Legend

- Site - Overhead Line (OHL) proposed route
- Underground Cable (UGC) proposed route
- Watercourse



Watercourse 1: Nant y Ffylion

0 100 200 Meters

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

wsp

Client: PENNANT WALTERS

Project: FOEL TRAWSNANT OTTER REPORT

Title: SITE, WATERCOURSE LOCATIONS AND SURVEY RESULTS

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N

Legend

- Underground Cable (UGC) proposed route
- Watercourse
- Approximate Location of Temporary Dam

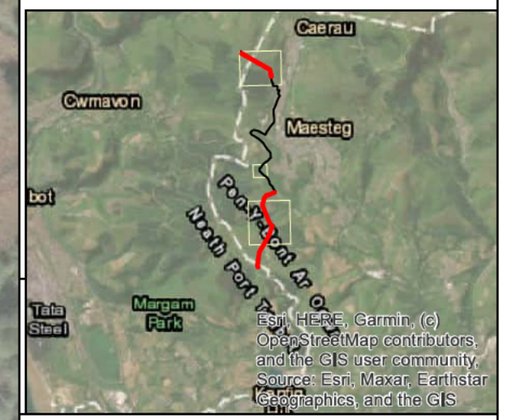
Otter evidence type

- Potential resting site
- Potential resting site - possible footprints

RS1
RS2
RS3
RS4
RS5
RS6
RS8

Watercourse 4: Nant y Goblyn
Watercourse 4: Unnamed tributary
Watercourse 4: Nant Sychbant

0 100 200 Meters



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wsp

Client: PENNANT WALTERS

Project: FOEL TRAWSNANT OTTER REPORT

Title: SITE, WATERCOURSE LOCATIONS AND SURVEY RESULTS

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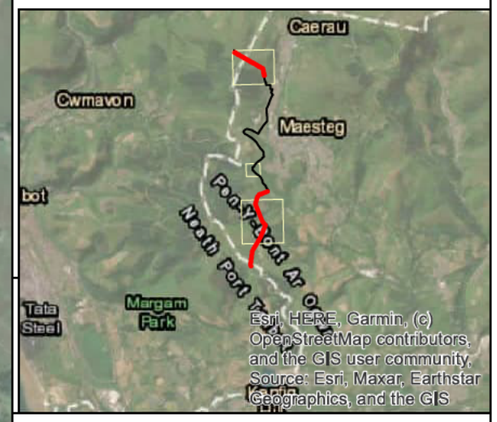
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N

Legend

- Site - Overhead Line (OHL) proposed route
- Watercourse



wsp

Client:
PENNANT WALTERS

Project:
FOEL TRAWSNANT
OTTER REPORT

Title
SITE, WATERCOURSE LOCATIONS AND SURVEY RESULTS

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Appendix A

PHOTOGRAPHS

Public

Figure A-1 - Photographs of Watercourse 1: Nant y Ffyllon

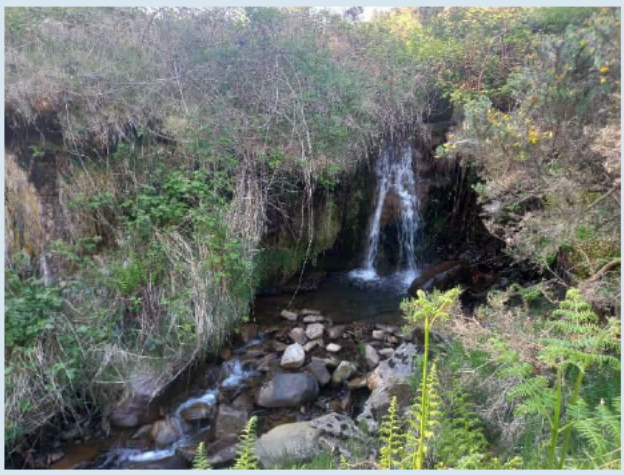
Photo 1 – Northern section of Nant y Ffyllon	Photo 2 – Northern section of Nant y Ffyllon
	
Photo 3 – Middle section of Nant y Ffyllon	**Photo 4 – Middle section of Nant y Ffyllon**
	
Photo 5 – Lower section of Nant y Ffyllon	**Photo 6 – Lower section of Nant y Ffyllon**
	

Table A-2 - Photographs of Watercourse 2: Nant Lluest-wen

Photo 7 – Middle section of Nant Lluest-wen	Photo 8 – Middle section of Nant Lluest-wen
	
Photo 9 – Eastern section of Nant Lluest-wen	**Photo 10 – Western section of Nant Lluest-wen**
	

Table A-3 - Photographs of Watercourse 3: Nant y Castell

Photo 11 – Southern section of Nant y Castell	**Photo 12 – Southern section of Nant y Castell**
	
Photo 13 – Middle section of Nant y Castell	**Photo 14 – Northeastern, vegetated section of Nant y Castell**
	
Photo 15 – Northeastern section of Nant y Castell	**Photo 16 – Northeastern section of Nant y Castell**
	

Table A-4 - Photographs of Watercourse 4: Nant Sychbant, including otter RSs

Photo 17 – Nant y Goblyn	**Photo 18 – Evidence of human disturbance along Nant y Goblyn**
	
Photo 19 – Unnamed tributary	**Photo 20 – Northern extent of unnamed tributary**
	
Photo 21 – Nant Sychbant	**Photo 22 – RS1**
	

Photo 23 – RS2	Photo 24 – RS3
	
Photo 25 – RS4	**Photo 26 – An unknown footprint at RS4**
	
Photo 27 – RS5	**Photo 28 – RS6**
	

Photo 29 – RS7	[redacted]
	
Photo 31 – RS8	
	



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