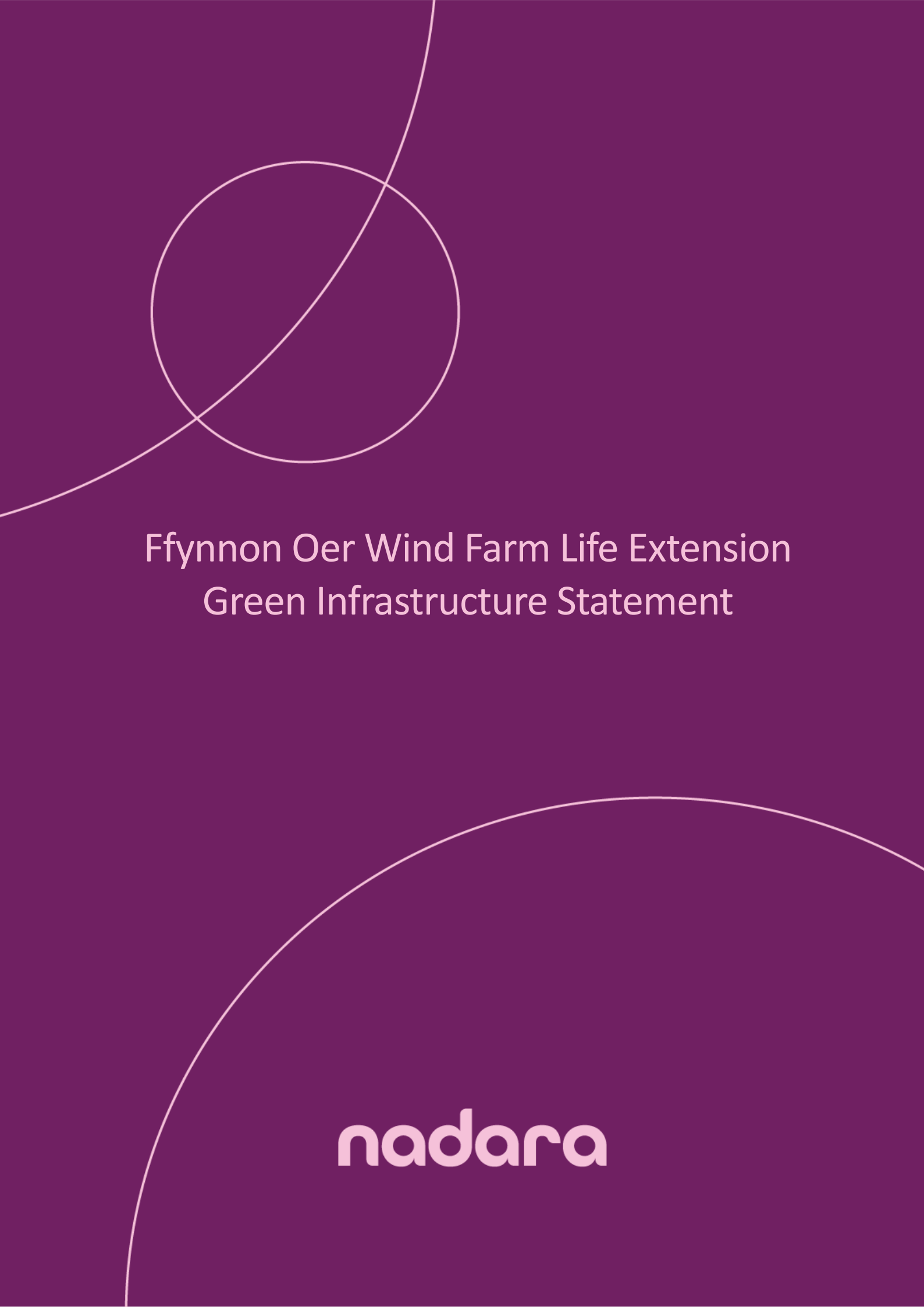




Ffynnon Oer Wind Farm Life Extension Green Infrastructure Statement

nadara



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Glossary

Term	Definition
Applicant	Ffynnon Oer Windfarm Limited
Baseline	The existing conditions that prevail against which the effects of the wind farm life extension are assessed against.
EIA Regulations	The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended).
Environmental Impact Assessment (EIA)	EIA is a means of carrying out, in a systematic way, an assessment of the likely significant environmental effects from a development.
Environmental Statement (ES)	A document reporting the findings of the EIA and produced in accordance with the EIA Regulations.
ES Addendum	A supplementary document to the original ES that provides additional and updated environmental information.
Proposed Life Extension	The proposed life extension for Ffynnon Oer Wind Farm to continue operating for an additional 10 years.
Section 73	Section 73 of the Town and Country Planning Act 1990 (as amended). An application under section 73 is an application to remove or vary planning conditions attached to a previous planning permission.
Site boundary	The land occupied by Ffynnon Oer Wind Farm.

Abbreviations

Abbreviation	Definition
BDP	Biodiversity Duty Plan
DECCA	Diversity, Extent, Condition, Connectivity and Aspects
ES	Environmental Statement
EIA	Environmental Impact Assessment
GWh	Gigawatt hours
HMP	Habitat Management Plan
km	Kilometre
LDP	Local Development Plan
LNP	Local Nature Partnership
m	metre
MW	Megawatt
NPT	Neath Port Talbot
NPTCBC	Neath Port Talbot County Borough Council
NPT LNP	Neath Port Talbot Local Nature Partnership
NRAP	Nature Recovery Action Plan
NRW	Natural Resources Wales
PPW	Planning Policy Wales
RLDP	Replacement Local Development Plan
SMNR	Sustainable Management of Natural Resources
TAN	Technical Advisory Note

1. INTRODUCTION

- 1.1.1 This Green Infrastructure Statement has been prepared by Natural Power Consultants Limited (herein Natural Power) on behalf of Nadara Limited (herein in Nadara) in support of an application being made via Section 73 of the Town and Country Planning Act 1990 (hereafter Section 73 application) to amend the existing permission in order to extend the operational life of Ffynnon Oer Wind Farm.
- 1.1.2 In 2002, an Environmental Impact Assessment (EIA) was prepared for Ffynnon Oer Wind Farm as part of an application for planning permission to Neath Port Talbot County Borough Council (NPTCBC) (planning application reference P2002/1322). The original Environmental Statement (ES) submitted for the application can be found in Volume 1, Appendix A1.2: Ffynnon Oer Scoping Report, Scoping Opinion and Pre-Application Consultation of the ES Addendum submitted with the Section 73 Application.
- 1.1.3 NPTCBC granted consent for Ffynnon Oer Wind Farm on 27th May 2003, subject to a number of conditions, including Condition 6 which restricts the operational life to 20 years (a copy of the decision notice can be found in Volume 1, Appendix A1.1: Planning approval with consented planning conditions of the ES Addendum).
- 1.1.4 Ffynnon Oer Wind Farm commenced generation of electricity on 31st July 2006 and has continued operation since this date. The existing consent is due to expire on the 31st July 2026 (as per Condition 6 of the current planning permission). The Applicant is seeking to amend Condition 6 to extend the operational life of Ffynnon Oer Wind Farm by an additional 10 years, to enable operations to continue until 31st July 2036 (referred to as the Proposed Life Extension).
- 1.1.5 The document has been produced in line with Planning Policy Wales 12 (PPW).¹
- 1.1.6 Green infrastructure has been defined in Section 6.2 of PPW as:

“the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Component elements of green infrastructure can function at different scales and some components, such as

¹ Planning Policy Wales, Edition 12 (February 2024). Available from: <https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf> [Accessed 18/03/2026]

trees and woodland, are often universally present and function at all levels. At the landscape scale green infrastructure can comprise entire ecosystems such as wetlands, waterways, peatlands and mountain ranges or be connected networks of mosaic habitats, including grasslands. At a local scale, it might comprise parks, fields, ponds, natural green spaces, public rights of way, allotments, cemeteries and gardens or may be designed or managed features such as sustainable drainage systems. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks."

- 1.1.7 In April 2019, the Welsh Government declared a climate emergency, aiming to trigger more focus and action to address the climate crisis, with a target to achieve net-zero emissions by 2050, and a carbon-neutral public sector by 2030². NPTCBC's Decarbonisation and Renewable Energy Strategy³, was published in May 2020 both as a response to the Welsh Government declaration of a climate emergency and also to provide leadership in reducing carbon emissions within its jurisdiction.
- 1.1.8 The State of Nature Report for Wales (2019)⁴ reported that *"Since 1970, pressure on Wales' diverse landscapes and seascapes has resulted in both losses and gains for biodiversity."* and that *"on average, Wales' wildlife has declined in recent decades."* The report also stated that *"securing good condition and appropriate management remains a challenge, and further action is needed to secure resilient ecosystems"*. In June 2021, the Welsh Government declared a nature emergency. Responding to the increased awareness of the loss of nature, NPTCBC produced its first Biodiversity Duty Plan in December 2017.⁵
- 1.1.9 This Green Infrastructure Statement is structured as follows, taking local and national policy into consideration:
- Planning and Legislation Context;

² Welsh Government Press Release, 29th April 2019. Available at: <https://www.gov.wales/welsh-government-makes-climate-emergency-declaration> [Accessed 18/03/2026]

³ Decarbonisation and Renewable Energy Strategy (2020). Available at: <https://media.npt.gov.uk/media/ushdtddq/dare-the-neath-port-talbot-decarbonisation-and-renewable-energy-strategy.pdf?v=20240724153038> [Accessed 18/03/2026]

⁴ State of Nature: A Summary for Wales (2019). Available at: <https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-Wales-summary.pdf> [Accessed 18/03/2026]

⁵ <https://www.npt.gov.uk/culture-and-tourism/countryside-and-wildlife/wildlife-law-and-advice/biodiversity-duty-plan/biodiversity-duty-plan-2020-2023/introduction/#:~:text=As%20part%20of%20that%20duty,reversing%20the%20decline%20in%20bio diversity.> [Accessed 18/03/2026]

- The Proposed Life Extension;
- Demonstration of Policy Compliance;
- Biodiversity Enhancement; and
- Conclusion.

2. PLANNING AND LEGISLATION CONTEXT

2.1 Planning Policy Wales 12 (PPW)

2.1.1 Chapter 6 of PPW¹, states that:

"A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal."

2.1.2 PPW includes that the Green Infrastructure Statement should:

"Highlight any baseline data considered and surveys and assessments undertaken, including but not limited to, habitats and species surveys, arboricultural surveys and assessments, sustainable drainage statements, landscape and ecological management plans."

2.1.3 PPW also states that the Green Infrastructure Statement should provide evidence that a 'step-wise approach' to biodiversity enhancement has been followed, and ensure that a plan for net benefit for biodiversity is provided. However, because the Proposed Life Extension does not include any physical changes to the operational wind farm, the step-wise approach is not relevant to this Section 73 Application and so is not considered in this Green Infrastructure Statement.

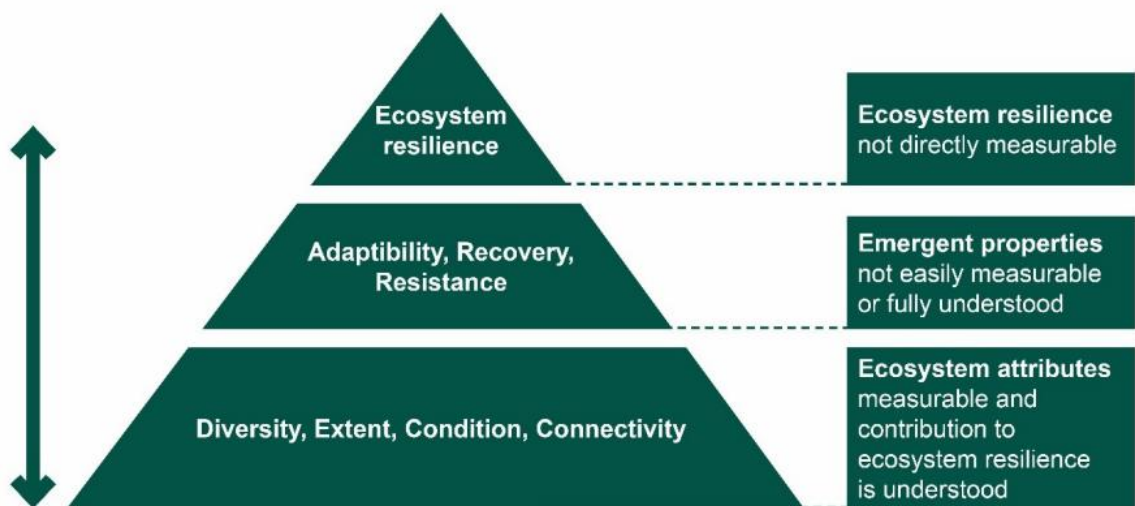
2.1.4 Biodiversity enhancement in relation to the Proposed Life Extension is discussed in section 5 of this Green Infrastructure Statement.

2.2 Diversity, Extent, Condition, Connectivity and Aspects (DECCA) Framework⁶

2.2.1 Natural Resources Wales (NRW) has developed the DECCA framework for the evaluation of ecosystems and their resilience based on the five attributes:

- Diversity;
- Extent;
- Condition;
- Connectivity; and
- Aspect.

2.2.2 The DECCA framework is presented in Figure 1.1.



Source: Natural Resources Wales (NRW)

Figure 1.1: DECCA Framework and the relationship between the attributes and emergent properties of resilience

2.2.3 NRW state in “Defining and assessing ecosystem resilience”⁶ that:

“Under the Environment (Wales) Act, Natural Resources Wales and other bodies should seek to maintain and enhance biodiversity and the resilience of ecosystems. To this end we have developed a conceptual resilience framework for Wales, and new tools to put it into practice. Resilience is core to the new, integrated approach to the environment, which is based on the flow from

⁶ Defining and assessing ecosystem resilience. NRW (2020). Available at: <https://cdn.cyfoethnaturiol.cymru/696279/ecosystem-resilience-in-a-nutshell-1-what-is-ecosystem-resilience.pdf> [Accessed 18/03/2026]

ecosystems, through ecosystem services and benefits, to well-being. Sustainable Management of Natural Resources (SMNR), is the means by which the Welsh environment is managed to achieve this flow, and resilience is the property of ecosystems that allows the flow to persist in the face of impacts and change”.

- 2.2.4 The approach to biodiversity enhancement (discussed in Section 5 below) for the Proposed Life Extension builds ecosystem resilience via the DECCA framework.

2.3 Well-being of Future Generations Act⁷

- 2.3.1 The Well-being of Future Generations Act states that a ‘Prosperous Wales’ can be achieved through investment in renewable and low carbon energy sources. It also states a ‘Resilient Wales’ can be achieved and that ‘Wales’ topography also lends itself to renewable energy generation’.

- 2.3.2 The Act states:

“Above all, a Globally Responsible Wales is promoted by reducing our carbon footprint through integrated public transportation infrastructure, encouraging globally responsible business and the promotion of renewable energy over carbon-emitting sources and resource choices through which multiple benefits can be realised”.

2.4 Neath Port Talbot County Borough Council

NPTCBC Green Infrastructure Assessment

- 2.4.1 PPW requires Local Planning Authorities to undertake Green Infrastructure Assessments in order to “*provide key evidence to support the preparation of development plans*”¹. Accordingly, in December 2024, NPTCBC developed a Green Infrastructure Assessment⁸ to support their Replacement Local Development Plan (2023-2038).⁹

⁷ *The Well-being of Future Generation Act*. Welsh Government (2015). Available at: <https://www.gov.wales/well-being-of-future-generations-wales> [Accessed 18/03/2026]

⁸ *Replacement Local Development Plan 2023-2038 Green Infrastructure Assessment*, Neath Port Talbot Council (December 2024). Available at: <https://media.npt.gov.uk/media/uhqjxtyl/doc-13-green-infrastructure-assessment.pdf> [Accessed 18/03/2026]

⁹ *Replacement Local Development Plan 2023-2038*, Neath Port Talbot Council. Available at: <https://www.npt.gov.uk/planning-and-building-control/planning-policy/replacement-local-development-plan-rldp-2023-2038/preferred-strategy/> [Accessed 18/03/2026]

- 2.4.2 The NPTCBC Green Infrastructure Assessment *“Provides a strategic overview of Neath Port Talbot’s Green Infrastructure and nature network, identifying the existing network, the resilience of the network and identifies the key issues and opportunities for Green Infrastructure”*.¹⁰

Neath Port Talbot Nature Recovery Action Plan

- 2.4.3 NPTCBC is the Secretariat of the Neath Port Talbot Local Nature Partnership (NPT LNP) which is a local framework designed to halt biodiversity loss and restore habitats in NPT through collaborative, locally-driven action.
- 2.4.4 In 2024, The NPT LNP produced an assessment of the State of Nature in the county, which classified its habitats into 11 broad categories, divided further these into sub-categories or specific habitats. Four of these categories (heathland and moorland, semi-natural grassland, wetland habitats and freshwater) are the dominant habitats within Ffynnon Oer Wind Farm. The State of Nature assessment categorised the natural state of these habitats (as good, fair, poor or unknown). Linked to the State of Nature assessment of the county was the production of a Nature Recovery Action Plan (NRAP)¹¹ for NPT by NPT LNP.
- 2.4.5 The objectives of the NPT NRAP¹² are to:
- *“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 its evidence, understanding and monitoring; and*

¹⁰ *Replacement Local Development Plan Evidence Base*. Available at: <https://www.npt.gov.uk/planning-and-building-control/planning-policy/replacement-local-development-plan-rldp-2023-2038/evidence-base/#:~:text=Green%20Infrastructure%20Assessment%20-Provides%20a%20strategic,key%20issues%20and%20opportunities%20for%20Green%20Infrastructur> [Accessed 18/03/2026]

¹¹ *Nature Recovery Action Plan*, Neath Port Talbot Local Nature Partnership. Available at: https://www.naturenpt.cymru/actions#:~:text=The%20NRA%20also%20includes%20a%20facilitation%20role,places%20*%20Making%20plans%20for%20the%20future [Accessed 18/03/2026]

¹² *Appendix D - The Nature Recovery Action Plan for Wales Objectives*. Available at: <https://www.npt.gov.uk/culture-and-tourism/countryside-and-wildlife/protecting-nature-in-neath-port-talbot/biodiversity-duty-plan/biodiversity-duty-plan-2020-2023/appendices/appendix-d-the-nature-recovery-action-plan-for-wales-objectives/> [Accessed 18/03/2026]

- *Put in place a framework of governance and support for delivery."*

2.4.6 The NPT NRAP outlines actions for the recovery of all habitat types in NPT.

Neath Port Talbot Biodiversity Duty Plan 2023-2026

2.4.7 NPTCBC's current Biodiversity Duty Plan (BDP)¹³ is a road map for shaping a more biodiverse and resilient NPT. It builds on current policy and legislation to set out what NPTCBC must do to meet its legal requirements regarding its biodiversity and ecosystem resilience duties through the NRAP objectives.

3. THE PROPOSED LIFE EXTENSION

3.1.1 Ffynnon Oer Wind Farm is an operational wind farm located between the Afan and Neath valleys in South Wales, comprising 16, two-Megawatt (MW) turbines, with a total installed capacity of 32 MW.

3.1.2 Ffynnon Oer Wind Farm is situated approximately 2 km west of Glyncorrwg, fully within the NPTCBC jurisdiction. The location of the wind farm is shown in Figure 1.1: Site Location of the ES Addendum. Figure 1.2: Site Layout shows the site boundary and infrastructure layout of Ffynnon Oer Wind Farm.

3.1.3 The Proposed Life Extension is for the continued operation of the existing Ffynnon Oer Wind Farm. Renewable energy would continue to be produced for an additional 10 years, without additional construction phase disturbance and/or displacement to habitats and species. Therefore, the Proposed Life Extension would result in no material changes to the operational wind farm.

3.1.4 In support of the Proposed Life Extension and the application, ecological and ornithological surveys and assessments have been undertaken.

3.2 Statutory Designated Sites and Ecology background

3.2.1 The Proposed Life Extension is not located within any statutory or non-statutory sites designated for ecological or ornithological features. An assessment of potential effects upon ecological and ornithological features of the Proposed Life Extension is presented in Section 15 of the ES Addendum submitted with the Section 73 Application.

¹³ Neath Port Talbot Council Biodiversity Duty Plan 2023 - 2026. Available at: <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.npt.gov.uk%2Fmedia%2Ffigfb5me%2Fbiodiversity-duty-plan-2023-2026.docx%3F%3D20240212114622&wdOrigin=BROWSELINK> [Accessed 18/03/2026]

- 3.2.2 Consultation was carried out with NPTCBC in March and April 2025 to discuss and agree the scope of ecological and ornithological surveys for the Proposed Life Extension. Following this initial consultation, a Scoping Report was submitted and Scoping Opinion issued by NPTCBC.
- 3.2.3 The site is used primarily for sheep and cattle grazing and is surrounded by commercial conifer plantation. Although potential effects on a range of ecological and ornithological features, including habitats, mammals, amphibians, reptiles, invertebrates and birds are usually assessed when considering a new wind farm development, the application for the Proposed Life Extension will not result in any physical changes to infrastructure. This includes no changes to the turbines, tracks or associated infrastructure, which will all remain in situ, with no change in the size or layout of the wind farm. Therefore, only the potential effects on birds and bats from the ongoing operation of the turbines and potential effects of decommissioning were considered within the ES Addendum.
- 3.2.4 A walkover survey of the original habitat enhancement areas was also undertaken to inform a review of the Habitat Management Plan (HMP)¹⁴.
- 3.2.5 Since the original ES was submitted in 2002, significant updates to legislation and new guidance have been published, specifically in relation to the methods for assessing the impacts of wind developments on both bats and birds, and provision of appropriate survey methodologies. However, no guidance provides specific information in relation to life extensions, therefore a proportionate approach to survey and assessment with reference to guidance for repowering of wind farms was agreed in consultation with NPTCBC.
- 3.2.6 As a result, the following targeted surveys were undertaken between April and October 2025:
- Bat static activity surveys using eight full spectrum detectors deployed for a minimum of ten nights during spring, summer and autumn 2025;
 - Bat and bird carcass searches at eight turbines completed weekly between 1 July and 30 September 2025 (13 visits in total);
 - Searcher efficiency and carcass persistence trials between 3 July and 25 September 2025;
 - Breeding bird surveys between April and July 2025 (inclusive); and

¹⁴ Entec UK Limited. (2005). Ffynnon Oer Windfarm Habitat Management Plan. RWE nPower Renewables.

- Breeding raptor surveys between April and July 2025 (inclusive).

- 3.2.7 Analysis of the bat static activity surveys identified that bat activity was highest during summer, followed by autumn then spring. Overall, common pipistrelle were the most frequently recorded bat species, followed by *Myotis* species. Soprano pipistrelle, Nathusius' pipistrelle, unidentified *Pipistrellus* species, brown long-eared, Leisler's and lesser horseshoe bats were also recorded. The full results of these surveys can be found in Appendix A15.2: Ecology and Ornithology Technical Appendix.
- 3.2.8 A single small *Pipistrellus* species (either common or soprano pipistrelle) carcass was recovered at Turbine 3 during the carcass searches on the 8th August. No other bat carcasses were recorded during the carcass searches. Using the carcass search results, bat fatality analysis calculated that between the 1 July and 30 September 2025, there were likely 0.05 bat fatalities per day at Ffynnon Oer Wind Farm. The searcher efficiency trials resulted in 100% searcher efficiency. On average, carcasses persisted for six days during the carcass persistence trials.
- 3.2.9 A total of three bird carcasses and three feather spots were recovered during the carcass searches at turbines 3, 4, 5, 10 and 15. The three bird carcasses were identified as passerines: one probable song thrush, one stonechat and one probable tree pipit. The three feather spots were identified as corvid (crow) species.
- 3.2.10 A total of 20 bird species were recorded during the breeding bird survey, of which 12 are species of conservation concern. Of the species of conservation concern, breeding territories were identified for six species: cuckoo, skylark, willow warbler, song thrush, wheatear and meadow pipit.
- 3.2.11 During the breeding raptor surveys, two target species were recorded, goshawk and red kite. A single secondary species, buzzard, was also recorded. No breeding behaviour was observed during the surveys and no nests were located within the survey area.
- 3.2.12 Following assessment, potential effects of the Proposed Life Extension on ecological and ornithological features are considered to be not significant and no additional mitigation measures are required. Potential cumulative effects on identified Important Ecological Features for which the magnitude of effect was higher than negligible were also considered to be not significant.

4. DEMONSTRATION OF POLICY COMPLIANCE

- 4.1.1 The PPW step-wise approach provides an opportunity for new developments to demonstrate a structured approach to policy compliance, and to ensure biodiversity net benefit through their Green Infrastructure Statements. However, given that the Proposed Life Extension involves no physical changes to the operational wind farm, the step-wise approach is not relevant, and is therefore omitted from this Green Infrastructure Statement.
- 4.1.2 However, the legislation and policy described in Section 2 of this Green Infrastructure Statement also demonstrate that biodiversity enhancement needs to be considered by planning applications, and that a net benefit for biodiversity needs to be demonstrated.
- 4.1.3 Biodiversity enhancements associated with the Proposed Life Extension are discussed in Section 5 below. These are proposed to align with PPW¹ to achieve a net benefit for biodiversity within the site which builds ecosystem resilience via the DECCA framework; as well as two objectives of the NPT NRAP, namely to *"increase the resilience of our natural environment by restoring degraded habitats and habitat creation"* and *"improve its evidence, understanding and monitoring."*

5. BIODIVERSITY ENHANCEMENT

- 5.1.1 The proposed life extension of Ffynnon Oer Wind Farm will provide continued production of renewable energy with no identified significant effects on ecological features. It is anticipated that the potential effects of the decommissioning phase will be similar to potential effects of a construction phase. However, potential effects of decommissioning will be mitigated via embedded mitigation that will be outlined in a Decommissioning Plan as per Planning Condition 6 of current consent prior to decommissioning. Enhancements to benefit the biodiversity assemblage within the site will be secured for the Proposed Life Extension resulting in a net benefit for biodiversity throughout the proposed 10-year extended operational lifetime of Ffynnon Oer Wind Farm.
- 5.1.2 The habitats at Ffynnon Oer Wind Farm comprise blanket bog, heathland, acid grassland and flush. The current Habitat Management Plan (HMP)¹⁴ objectives include enhancement of blanket bog and heathland habitat within the site. These objectives are reviewed in Appendix A15.1 of the ES Addendum: Habitat Management Plan Review and Biodiversity Enhancements. Given the focus on enhancement of these habitats and the use of much of the site as grazing pasture, there is a limited area for further enhancement which will not result in a change in land use or reduction in

grazing area. Similarly, enhancement within proximity to turbines (75 m) has been avoided to reduce the possibility of enhancements encouraging bird and bat species to forage near the turbines which would increase the potential risk of collision. Instead, biodiversity enhancements targeting improved habitat diversity or condition are being considered in accordance with the DECCA framework.

- 5.1.3 It is proposed that biodiversity enhancements would be confirmed post consent in a detailed updated HMP as a planning condition attached to the Section 73 consent. Habitat enhancements would be proposed to benefit the biodiversity assemblage within the site to align with actions laid out in the local NRAP¹² under the RLDP⁹. Suitable locations for enhancements will be identified following completion of a Phase 1 habitat survey in summer 2026.
- 5.1.4 Further details of the HMP objectives and proposed updates are provided in Appendix A15.1 of the ES Addendum.

6. CONCLUSION

- 6.1.1 This Green Infrastructure Statement, and the ES Addendum submitted with the Section 73 Application, demonstrate that the Proposed Life Extension complies with a number of legislative and policy measures, such as:
- Technical Advice Note 5: Nature Conservation and Planning (2009)¹⁵;
 - PPW;
 - Future Wales¹⁶; and
 - Well-being of Future Generations Act⁷.
- 6.1.2 The biodiversity enhancements that would be confirmed post consent would be proposed to benefit biodiversity within the site to align with actions laid out in the NPT NRAP.¹¹
- 6.1.3 The ecological improvements included within the Proposed Life Extension will target improved habitat diversity and/or condition, in accordance with the DECCA framework. It is proposed that biodiversity enhancements would be confirmed post consent in a detailed updated HMP as a planning condition attached to the Section 73 consent. The ecological improvements would aim

¹⁵ Welsh Assembly Government (2009). *Planning Policy Wales Technical Advice Note 5: Nature Conservation and Planning*. Available at: <https://www.gov.wales/technical-advice-note-tan-5-nature-conservation-and-planning> [Accessed 18/03/2026]

¹⁶ *Future Wales: The National Plan 2024*. Available at: <https://www.gov.wales/future-wales-national-plan-2040> [Accessed 18/03/2026]

to contribute towards broader local, regional, and national goals for improving Wales' green infrastructure and biodiversity.