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Response to NRW consultation in relation to bats at the operational Ffynnon Oer Wind Farm

Dear Giles,

Thank you for your consultation response to the Section 73 application, to extend the operational life of Ffynnon Oer Wind Farm by an additional 10 years, (Neath Port Talbot County Borough Council planning reference: P2026/0116), submitted to Natural Resources Wales (NRW) for comment on 11 March 2026.

Following receipt of the consultation response on 14 April 2026, Nadara (hereafter referred to as 'the Applicant') sent a request by email on 28 April to NRW to set up a meeting to discuss the key comments raised. NRW responded on the 30 April to advise that it would not be possible to arrange a meeting on the suggested dates and requested that queries were submitted to NRW in writing for review.

NRW expressed within their consultation response that they are content with the survey methodology carried out for bats and they have no further concerns regarding ornithology. As the key comments raised within NRW's consultation response to Section 15 - Ecology and Ornithology of the Ffynnon Oer Wind Farm Life Extension Environmental Statement (ES) Addendum, were made in relation to bats, this letter focuses on addressing these key comments. The key comments made by NRW in the consultation response are listed in Table 1, with responses to these comments provided below under the relevant headings: 'Turbine Siting and Bat Buffers' and 'Bat Activity - Targeted Mitigation'.

Table 1: Summary of key consultation responses to the Section 73 Application

NRW Response	Key Comments	Applicant Response
14 April 2026 NRW written response letter to the Section 73 Environmental Impact Assessment application to amend the wording of condition 6 (operational period) of planning permission P2002/1322 determined on 27.05.2003 to extend the operational	<i>We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding protected species (turbine siting and bat buffers). If this information is not provided, we would object to this planning application.</i> <i>In order to fully assess the proposal, we advise that further information is sought from the applicant, including:</i> - details of each turbine location in relation to the nearest bat habitat feature, including a	Addressed under 'Turbine Siting and Bat Buffers'



NRW Response	Key Comments	Applicant Response
life of Ffynnon Oer Wind Farm by an additional 10 years, to enable operation to continue until 31st July 2036.	<i>description of the feature, shown on suitably scaled drawings with bat habitat features overlaid and the 75 m buffer distances clearly indicated; and</i> <i>where the nearest habitat feature comprises woodland (specifically Turbines T9 and T14), details of any habitat manipulation proposed to achieve the required buffer distance, noting that this is likely to involve the removal of sections of plantation woodland.</i> <i>Where habitat manipulation involves the removal of plantation woodland, we advise further that the applicant;</i> <i>clarifies the extent and location of habitat loss required at these locations, to be included on an appropriately annotated plan; and</i> <i>undertakes surveys for roosting bats within an appropriate buffer of the affected turbines.</i>	
	<i>We also advise that based on the information submitted to date, conditions regarding European protected species should be attached to any planning permission granted. Without the inclusion of these conditions, we would object to this planning application.</i> Condition: Curtailment: Advised that a raised cut-in speed of up to 5 m/s is applied between April and October at T5, T10 and T16. Condition: Blade feathering: Advised that blade feathering is implemented on all turbines below the cut-in speed (3 m/s) between April and October. Condition: Post-construction monitoring: Advised that periodic post-construction monitoring is undertaken throughout the lifetime of the development.	Addressed under 'Bat Activity - Targeted Mitigation'

Turbine Siting and Bat Buffers

As requested in the consultation response, the details of each turbine location in relation to the nearest bat habitat feature are provided in Table 2. Bat habitat features are shown in a figure enclosed with this letter (Bat Buffers and Bat Habitat Features) which also shows all turbine locations with surrounding 75 m buffers (calculated using NatureScot guidance¹ based on turbine specifications). As shown on this figure, T9 and T14 are within 75 m of woodland (conifer plantation). Approximately 1,150 m² of woodland is within the 75 m buffer of T9, with approximately 3,419 m² of woodland within the 75 m buffer of T14. The woodland that is present within the buffers of T9 and T14 is under NRW ownership.

¹ NatureScot (2021). Bats and onshore wind turbines – survey assessment and mitigation. Available at: <https://www.nature.scot/doc/bats-and-onshore-wind-turbines-survey-assessment-and-mitigation>



As requested by NRW, a Ground Level Tree Assessment² was carried out on the woodland within the 75 m buffer of T9 and T14 on 27 April 2026. No potential bat roost features were identified within either coupe within the 75 m buffer of T9 or T14. The surrounding plantation woodland comprises commercially grown Sitka spruce, which is generally of low suitability for roosting bats. Typically, non-native coniferous plantations are considered of low - moderate suitability for foraging and commuting bats, dependant on the structure of woodland, as they offer less invertebrate diversity and reduced roosting resource.

As outlined in section 15.8 of the ES Addendum, the bat activity recorded within proximity to T9 and T14 at detectors 4 and 13 (adjacent to T4 and T13) was relatively low (of all bat passes recorded across the eight bat detectors in 2025, 4.3% were recorded at T4 while 7.2% were recorded at T13, respectively) compared with activity recorded at other detectors (e.g. 19.4% at T16 and 38.8% at T10). Similarly, of all bat passes recorded at sunset and/or sunrise, 4% of all passes at sunset were recorded at T4 (four passes), with 1% recorded at T13 (one pass), all of which were common pipistrelle passes recorded during spring. Common pipistrelle was the most frequently recorded species overall, however, was determined to be at low risk with predicted effects considered to be of low negative magnitude and not significant. The activity recorded within proximity to T9 and T14, in addition to the absence of carcasses recorded during carcass searches and absence of potential roost features within adjacent woodland coupes further indicates that predicted effects of collision risk at T9 and T14 are of low negative magnitude and not significant.

It is understood that these sections of woodland are part of different coupes which are subject to a draft felling plan provided to the Applicant by email from a Senior Officer of Forest Operations at NRW on 10 November 2025. According to the felling plan, the 75 m buffer of T9 overlaps with two management coupes, one that is due to be felled in 2027, with the other due to be felled in 2032. The management coupe that falls within the 75 m buffer of T14 is due to be felled in 2032. As far as the Applicant has been informed via email as of 9 June 2026, there have been no updates to this felling plan. Based on the information provided in relation to the relatively low level of bat activity, condition of the coniferous plantation woodland and the lack of potential roost features within the woodland adjacent to T9 and T14, it is our opinion that no mitigation is required. Given that the coupes are owned and managed by NRW, if NRW are still of the opinion that mitigation is required following receipt of this letter, NRW could alter their felling plans to accommodate the habitat manipulation proposed within the consultation response (removal of sections of plantation woodland) within the 75 m buffer of T9 and T14.

In relation to non-woodland bat habitat features present within proximity to turbines, all such features present within the site boundary are low-lying linear features such as watercourses, ditches and stretches of stone wall. The recommended buffer for these features is 63 m, as calculated using NatureScot guidance¹ in relation to the turbine model which comprises a hub height of 58 m and blade length of 35 m. Two turbines, T10 and T13, have non-woodland bat habitat features within 63 m. At T13, a section of stone wall passes through the 63 m buffer, the closest point is 34 m, whilst a watercourse passes through the 63 m buffer of T10, the closest point is 55 m. Despite the proximity of bat habitat features to T10 and T13, no carcasses were recovered at either of these turbines (both searched 12 times). Bat activity at T13 was relatively low in comparison to activity at other detectors (7.2% of all passes recorded). Activity at T10 was the highest recorded across all detectors (38.8% of all passes recorded), however, detector 10 was positioned approximately 182 m from T10 due to limitations in available fixture-points within proximity to T10. As no carcasses were recovered at either T10 or T13, bat activity was relatively low at T13, and detector 10 was positioned 182 m from T10, it is considered that proximity of turbines to these features results in no significant impacts, as outlined in Section 15.19 of the ES Addendum.

² Collins, J (ed.) (2023) Bat surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). The Bat Conservation Trust, London.



Table 2: Turbine locations in relation to nearest bat habitat features

Turbine ID	Location (grid reference)	Approximate distance to nearest bat habitat feature (at closest point)	Bat habitat feature*
1	SS 84445 99516	294 m	Stream
2	SS 84635 99396	280 m	Stream
3	SS 84294 99247	196 m	Woodland
4	SS 84804 98587	84 m	Stream
5	SS 84113 98637	252 m	Woodland
6	SS 84732 98813	315 m	Woodland
7	SS 84587 98979	105 m	Drystone wall
8	SS 84475 98435	335 m	Stream
9	SS 84827 98339	58 m	Woodland
10	SS 84010 98143	55 m	Stream
11	SS 84390 98639	232 m	Drystone wall
12	SS 84900 99302	168 m	Woodland
13	SS 85051 98998	34 m	Drystone wall
14	SS 85116 99234	25 m	Woodland
15	SS 84320 98983	85 m	Drystone wall
16	SS 84362 98084	72 m	Stream

*Suitable bat habitat features include woodland, streams, hedges and drystone walls.

Bat Activity - Targeted Mitigation

Curtailment

NRW advised that curtailment of T5, T10 and T16 is applied between April and October and secured through an appropriately worded planning condition due to the spatial concentration of bat activity at these turbines. The bat activity at T5, T10 and T16 was highest in comparison with activity recorded across the rest of the site with 11%, 38.8% and 19.4% of all recorded bat activity recorded at these locations and the overall Bat Activity Index (BAI) (the number of bat passes per species and detector divided by the total number of valid survey nights for each detector as shown in Table 15.13 of the ES addendum) was highest at detector 10 (110.0), followed by detector 16 (51.9) and detector 5 (31.2). The location of all three of these detectors was over 75 m from the nearest turbine. No carcasses were recovered at any of these three turbines (each searched between



8-12 times). Furthermore, the highest activity was recorded at detector 10, which due to limitations in options for placement, was positioned 182 m from T10.

The bat activity and risk relative to the development, was assessed using the online Ecobat tool (as requested by NRW during the scoping response in October 2025). Overall bat activity across the site was identified to be low-moderate for *Pipistrellus* and *Myotis* species and low for brown long-eared bat, Lesser horseshoe bat and Leisler's bat. Although *Pipistrellus* species are considered to be at high risk of collision, the predicted effects of collision were considered to be of low negative magnitude at the local level and not significant, as outlined in the ES Addendum. Curtailment of T5, T10 and T16 is therefore not considered to be justified.

Blade feathering

NRW advised within the consultation response that blade feathering is implemented on all turbines at wind speeds below cut-in speed (3-3.5 m/s) between April and October, and that this should be secured through an appropriately worded planning condition.

It was confirmed with the Asset Manager at Ffynnon Oer Wind Farm that the turbines at Ffynnon Oer Wind Farm currently operate using feathering below 3 m/s cut-in speed during all months. Therefore, it is our understanding that no further action would be required in relation to this targeted mitigation and the Applicant is content with an appropriately worded planning condition.

Post-construction Monitoring

NRW advised that periodic post-construction monitoring is undertaken throughout the operational lifetime of the development, with a post-construction monitoring scheme submitted to and approved in writing by the LPA.

An appropriate schedule of post-consent operational monitoring will be agreed with NRW, in line with a planning condition.

Yours sincerely

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Encl. Figure: Bat Buffers and Bat Habitat Features

