Pennant Walters Ltd

FOEL TRAWSNANT

Green Infrastructure Statement

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2 INTODUCTION

2.1 BACKGROUND

2.1.1. This Green Infrastructure Statement has been prepared by WSP UK Ltd (WSP) on behalf of Pennant Walters Ltd (the Applicant). The statement supports a planning application to be submitted to Planning and Environment Decisions Wales (PEDW) for the installation of a 66 kV Underground and Overhead Cable Line connection from the Foel Trawsnant Wind Farm, situated within South Wales, to the wider national grid (referred to as the 'Project' from here on).

2.1.2. The Project falls within the bounds of two local planning authorities; the majority of the line is situated within the Bridgend Borough County Council (BCBC), however, the start and end of the connection falls within Neath Port Talbot Borough Council (NPTBC).

2.1.3. This statement should be read in conjunction with the accompanying **Planning Statement,** which sets out the planning policy context for the application, the **Design and Access Statement**, which explains the design rationale for the project, and the Draft **Environmental Statement (ES)** which sets out an assessment of the likely significant environmental effects of the Project.

2.1.4. This statement has been prepared in line with Planning Policy Wales (PPW) Edition 12, which includes a requirement for a green infrastructure statement to be submitted with all planning applications (paragraph 6.2.12).

"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. In the case of minor development, this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (Paragraph 6.4.15) has been applied.

2.1.5. It has also been informed by the 'Delivering High Quality Green Infrastructure in Wales' briefing paper published by Building with Nature (November 2023).

2.2 SUMMARY OF THE PROJECT

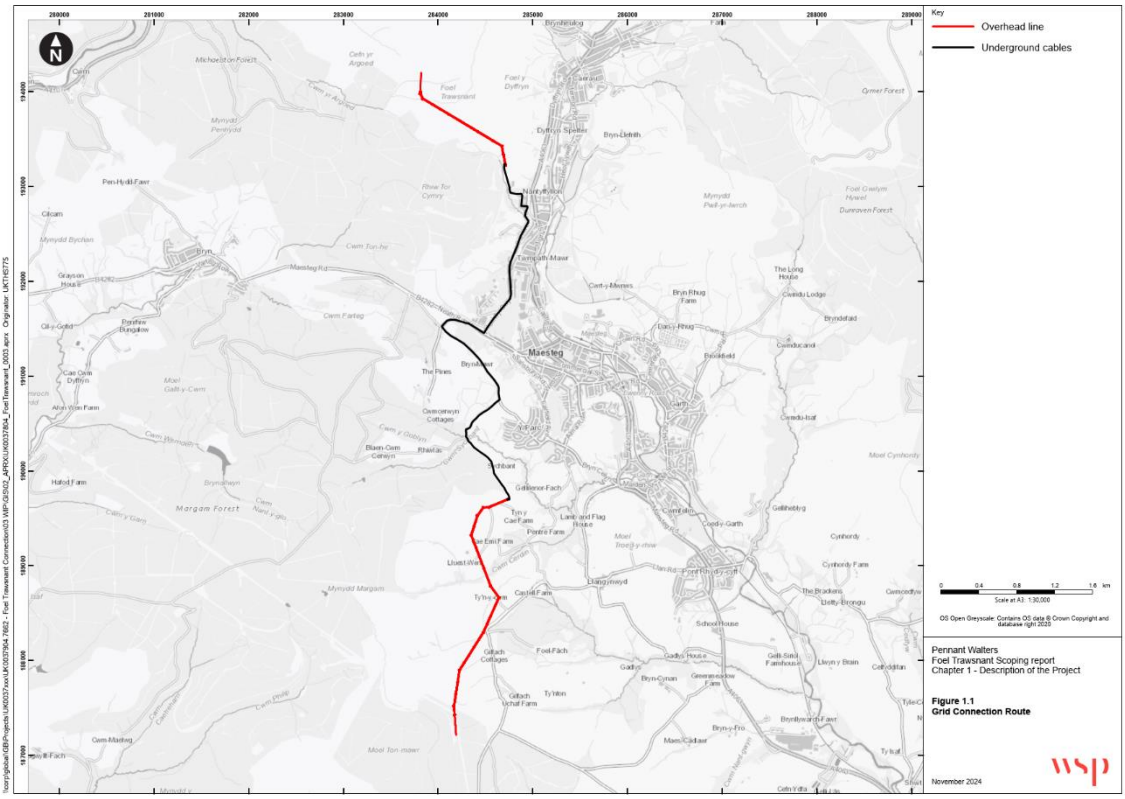
2.2.1. The Project covers a total length of 9.7km. In total, approximately 8.8km falls within BCBC, and 0.9km falls within NPTBC. Starting at the northernmost section, the grid connection begins as an overhead line, running for approximately 350m from the Foel Trawsnant wind farm to a location north west of Nantyffyllon, at which point it transitions to underground cables laid in roads and lanes from Kings Terrace heading south. The cable route then mainly follows the existing highway network south for approximately 5.1km. Once south of Maesteg, the connection reverts to an overhead line on private land and continues for approximately 3.1km, where it then connects to the existing wider national grid.

2.2.2. The main elements of the Project will consist of:

- 4.6km of Over-Head Line cables;
- 5.1km of Under-Ground Line cables; and
- Wooden H-Poles carrying the OHL.

2.2.3. Further information in relation to the Project and its objectives can be found within the accompanying Planning Statement and Design and Access Statement. The site location is shown in **Figure 2-1** below. The red lines relate to the overhead sections. Black relates to underground cables.

Figure 2-1 - Site Location



2.2.4. The design of the route has evolved in response to a number of environmental and technical constraints, as well as achieving land owner agreements for the siting of wooden poles, the installation of overhead lines and underground cables.

2.3 PURPOSE AND STRUCTURE OF THE REPORT

2.3.1. Green Infrastructure refers to the network of natural and semi-natural features that make up a landscape. This includes green spaces, rivers and lakes that interconnect various places. These elements of green infrastructure can function and operate at different scales, with some, such as trees and woodland, being universally present and functional at all levels.

2.3.2. This statement aims to outline the proposed integration of Green Infrastructure into the design of the Project and how the 'Step-Wise' approach has been applied. This document seeks to demonstrate the multi-functional benefits and sustainable management of natural resources that the Project can provide. An assessment is included within the statement which utilises The Building with Nature standards. As set out within PPW (paragraph 6.2.14), these standards represent good practice.

2.3.3. The statement is structured as follows:

- **Section 1: Introduction** – The introduction provides an overview of the scheme, sets out the purpose of the statement and explains the methodology that has been utilised;
- **Section 2: Context** – Sets out the relevant local, national and regional policy and guidance. It also includes mapping of the area which demonstrates the historic and cultural heritage, and how blue and green infrastructure connects with the Site;
- **Section 3: Scheme Strategy** – Explains the objectives and design strategy for the scheme, and sets out the GI opportunities across the proposed scheme;
- **Section 4: Green Infrastructure Assessment** – Uses the Building with Nature Standards Framework to assess the scheme; and
- **Section 5: Conclusion** - reaches conclusions on the overall provision and design of Green Infrastructure.

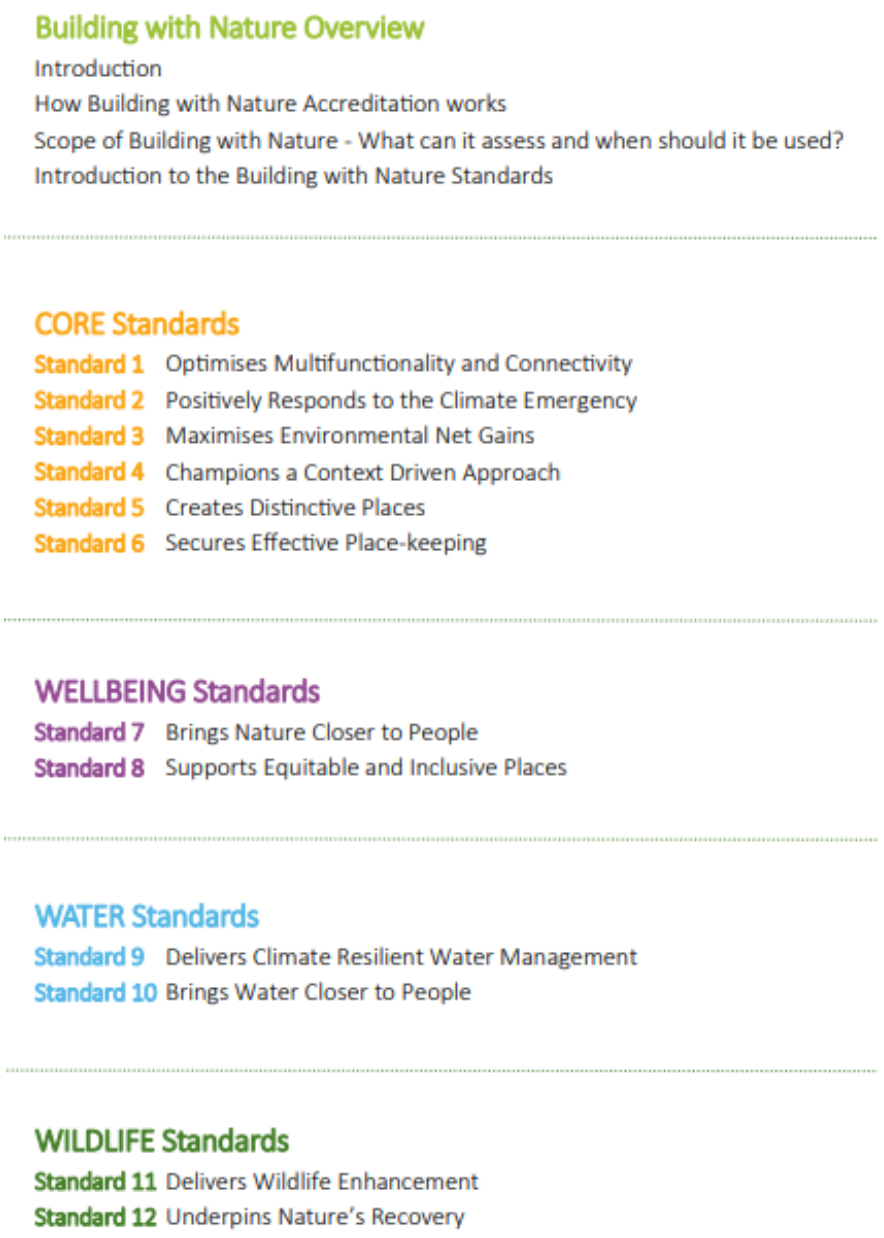
2.4 METHODOLOGY

2.4.1. This GI statement follows PPW, Natural Resource Wales (NRW), and relevant Local guidance on how to integrate and assess GI as part of the Project. The following explains the assessment methodology of the GI Statement:

1. Policy and guidance context: Due to the absence of a Green Infrastructure Assessment in BCBC, guidance from NPTBC has only been used. A review of national, regional and local policy has also been carried out in order to ensure that the Project incorporates best practice and GI priorities;
2. Green infrastructure assets: Contextual existing GI data sets from NRW's Data Map Wales / LandMap have informed the GI baseline of the proposals;
3. Scheme development: The Project seeks to respond to the BCBC/ NPTBC aspirations through a number of key objectives and design principles;
4. Green infrastructure assessment: The Building with Nature (BwN) Standards Framework 2.0[1] has been used to assess the proposed GI. The twelve standards shown in **Figure 2-2** provide a pathway for and recognition of early and sustained engagement in the design, implementation and long-term stewardship of high-quality GI. They focus on opportunities to put existing and planned-for habitats and wildlife at the centre of development. Each standard is defined by its purpose and key characteristics, which are presented in the form of questions. Within the assessment, the questions are used to advise how the design meets each of the Standards. Please note that the Project is not pursuing official BwN Accreditation, the BwN Standards Framework has been used as good practice to assess the GI priorities and opportunities.

[1] Build with Nature (2024) Standards Framework (BwN 2.0) Available at: Building with Nature (Accessed April 2024)

Figure 2-2 - Building with Nature Standards



3 POLICY AND SITE CONTEXT

3.1 POLICY AND GUIDANCE

3.1.1. National, regional and local planning policy relevant to this Green Infrastructure Statement has been summarised below. Further details of all of the applicable policies are set out within the **Planning Statement** and **Chapter 5** of the Environmental Impact Assessment **(Volume 1)**, which should be read alongside this document.

NATIONAL PLANNING POLICY

Planning Policy Wales (February 2024)[2]

3.1.2. Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which, together with PPW, provide the national planning policy framework for Wales.

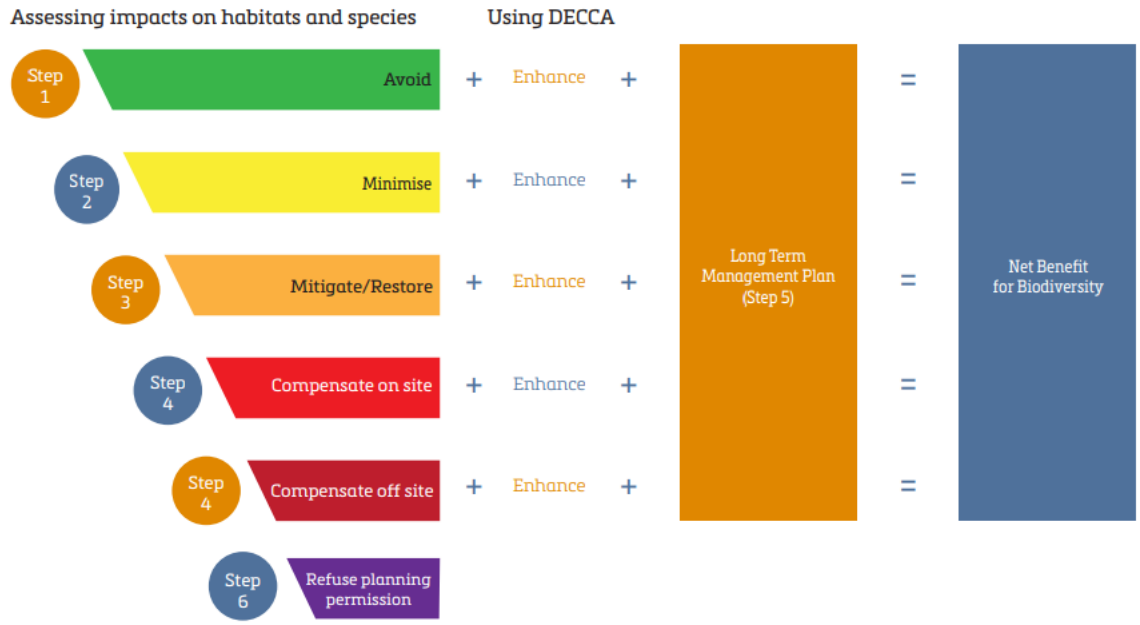
3.1.3. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.

3.1.4. In February 2024, edition 12 of the PPW was published. The main changes were in relation to green infrastructure, securing net benefit for biodiversity, strengthening protection of Sites of Special Scientific Interest (SSSI) and promoting new tree planting. Further information concerning these changes is provided below:

- **Green Infrastructure –** text around Green Infrastructure assessments was strengthened, with additional responsibilities given to Local Planning Authorities to adopt a strategic and proactive approach to green infrastructure. Paragraph 6.2.12 of PPW12 states that a 'proportionate' Green Infrastructure Statement should be submitted with all planning applications. The statement should highlight any baseline data considered and surveys and assessments undertaken, including habitats and species surveys, arboricultural surveys, sustainable drainage statements, landscape and ecological management plans, open space assessments and green space provision and active travel links;
- **Net Benefit for Biodiversity and the Step-Wise Approach –** PPW12 sets out a requirement for development to provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems through the application of the step-wise approach. It states the need to consider enhancement and long-term management at each step. Paragraph 6.4.14 confirms that this can be secured by attaching planning conditions and/or other obligations to a planning permission.
- The use of green infrastructure statements as a means of demonstrating the 'step-wise' approach is explicit. A diagram that provides a summary of the step-wise approach using DECCA is set out in Figure 12 of PPW12 and has been extracted below within **Figure 3-1**.
- Paragraphs 6.4.15 details the different stages of the approach,

[2] Welsh Government, (2024). Planning Policy Wales, Edition 12. Available online at: https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf [Accessed March 2025].

Figure 3-1 - Summary of the Step-Wise Approach



- **Protection for Sites of Special Scientific Interest** – PPW12 strengthens the protection given to SSSIs, stating that development within an SSSI must be avoided unless it is necessary for the management of the site. There is also a presumption against development that is not situated within an SSSI but likely to result in a significant negative impact. Paragraph 6.4.27 advises that development will only be acceptable in wholly exceptional circumstances and where it is considered appropriate, is not likely to damage the SSSI, and there is broad and clear agreement for mitigation and enhancement as part of a development;
- **Trees and Woodland –** additional text has been included relating to trees, woodlands and hedgerows and, in particular, the compensation that should be provided for any losses. Paragraph 6.4.42 states that planning authorities must first follow the step-wise approach where trees and hedgerows are removed as part of a proposed scheme. Where loss is unavoidable, compensation will be required through replacement planting.

Future Wales – the National Plan 2040 (February 2021)[3]

3.1.5. Future Wales: The National Plan 2040 (FWNP) was published in February 2021 and sets out the national development framework for development in Wales up to 2040. FWNP sets out a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate resilience, developing strong ecosystems, and improving the health and well-being of communities.

- Policy 9, 'Resilient Ecological Networks and Green Infrastructure,' is considered to be of particular relevance to this statement. This policy seeks to ensure that *"action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development*

[3] The Welsh Government (2021). Future Wales: The National Plan 2040. (Online) Available at: https://www.gov.wales/future-wales-national-plan-2040 (Accessed March 2025).

proposals through innovative, nature-based approaches to site planning and the design of the built environment".

Technical Advice Note (TAN) 5: Nature Conservation and Planning (September 2009)[4]

3.1.6. The Nature Conservation and Planning TAN provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.

3.1.7. While the TAN was published before the introduction of Green Infrastructure statements, the TAN still provides relevant information. In terms of green infrastructure, the TAN states that development policies and supplementary planning guidance should promote opportunities for the incorporation of wildlife and geological features within the design of the development.

3.1.8. This TAN sets out the key principles of planning for nature conservation, provides advice about the preparation and review of development plans, including the relevant statutory requirements, and addresses nature conservation in development control procedures.

3.1.9. It also deals with the conservation of internally, nationally and locally designated sites and habitats and also the conservation of protected and priority species.

REGIONAL PLANNING POLICY

South Central Wales Area Statement (2019)[5]

3.1.10. The South-Central Wales Area Statement outlines a landscape approach to address the increasingly complex and widespread environmental, social, and political challenges that transcend traditional management boundaries. It covers the local authority areas of Bridgend, the Vale of Glamorgan, Merthyr Tydfill and Rhondda Cynon Taff, as well as Cardiff.

3.1.11. The statement is subdivided into the themes of: *'Building Resilient Ecosystems', 'Connecting People with Nature', 'Working with Water', 'Improving our Health' and 'Improving our Air Quality'*.

3.1.12. Building resilient ecosystems is a key theme within this statement. It highlights two key players that are threats to the ecosystem: climate change and the loss of biodiversity. The theme recognises the importance of valuing and protecting the ecosystem.

South West Wales Area Statement (2019)[6]

3.1.13. The South-West Area Statement covers the authority areas of South West Wales, including Neath and Port Talbot.

3.1.14. The statement is subdivided into the themes of *'Reducing Health Inequalities', 'Ensuring Sustainable Land Management', 'Reversing the Decline of and Enhancing Biodiversity', and 'Cross-cutting theme: Mitigating and adapting to a changing climate'*.

3.1.15. Reversing the decline of, and enhancing, biodiversity is a key theme regarding this GI statement, It is highlighted that overall biodiversity is in decline, and it is therefore urgently needed for significant

[4] Welsh Government (2009) Technical advice note (TAN) 5: nature conservation and planning. Available at Technical advice note (TAN) 5: nature conservation and planning | GOV.WALES (Accessed April 2024)
[5] Natural Resources Wales (2019) South Central Wales Area Statement. Available at: https://naturalresources.wales/about-us/what-we-do/strategies-plans-and-policies/area-statements/south-central-wales-area-statement/introduction-to-south-central-area-statement/?lang=en (Accessed March 2025)
[6] Natural Resources Wales (2019) South West Wales Area Statement. Available at: https://naturalresources.wales/about-us/what-we-do/strategies-plans-and-policies/area-statements/south-west-wales-area-statement/introduction-to-south-west-area-statement/?lang=en (Accessed March 2025)

improvements to be made to the way the environment is managed. Ensuring sustainable land management recognises that the way in which land is managed is important in supporting and creating a high-quality environment.

LOCAL PLANNING POLICY

3.1.16. As stated previously, the Project falls within the authoritative bounds of two administrative areas:

- Bridgend County Borough Council; and
- Neath Port Talbot County Borough Council.

Bridgend County Borough Council Replacement Local Development Plan (RLDP), adopted March 2024[7]

3.1.17. The Replacement Local Development Plan (RLDP) was adopted in March 2024, this Plan replaced the previous Local Development Plan (LDP 2006 – 2021). The RLDP sets out key policies and land use allocations that will be used to shape and guide development taking place within Bridgend County Borough.

3.1.18. The policies of greatest relevance to this statement are set out below in **Table 3-1**.

Table 3-1 - Bridgend County Borough Council RLDP Relevant Policies

Adopted LDP Policy	Policy Summary
Policy DNP 1: Development in the Countryside	Policy DNP1 aims to protect the countryside from inappropriate development. The policy states that *"all development outside defined settlement boundaries must ensure that that integrity of the countryside is conserved and enhanced"* while the policy states that overall, there is a presumption against development in the countryside, renewable energies is listed under point 8, as an acceptable use. Its further states that *"countryside development must be of a sustainable form with prudent management of natural resources and respect for the cultural heritage of the area"*.
Policy DNP 4: Special Landscape Areas	Policy DNP4 seeks to ensure that the character and quality of the Country's Landscape is protected from inappropriate development. While the Project will travel through an SLA (SLA1: Foel y Dyffrn) the proposal would not be considered inappropriate, referring to the Landscape and Visual Impact Assessment undertaken as part of this Draft ES submission (see Volume 1, Chapter 6) the assessment concludes that the Project would not result in a negative impact to the surrounding landscape.
Policy DNP 5: Local and Regional Nature Conservation Sites	Policy DNP5 seeks to provide protection to locally and regionally important areas of nature conservation, stating that the development within or adjacent to highlighted sites *"must be compatible with the nature conservation or scientific interest of the area".* Two SINCs have been identified as being located within the bounds of the Project. Due to the nature of the Project and the proposed mitigation, it is

[7]Bridgend County Borough Council (2014). Bridgend County Borough Council Replacement Local Development Plan. (Online) Available at: https://www.bridgend.gov.uk/residents/planning-and-building-control/replacement-local-development-plan/adopted-bridgend-replacement-local-development-plan-2018-2033/ (Accessed 07 February 2025.

Adopted LDP Policy	Policy Summary
	considered unlikely that the Project would result in an adverse impact on sites of local and regional importance.
Policy DNP 6: Biodiversity, Ecological Networks, Habitats, and Species	Policy DN6 aims to achieve a balance between the need for development and the need to conserve biodiversity. The policy states that *"all development proposals must provide a net benefit for biodiversity and improved ecosystem resilience".*
Policy DNP 7: Trees, Hedgerows, and Development	Policy DNP7 recognises the importance of retaining trees and seeks to ensure that suitable trees are not harmed due to development. The policy states that *"development that would adversely affect trees, woodland and hedgerows of public amenity or natural/ cultural heritage value […] would not be permitted"*.
Policy SP 13: Decarbonisation and Renewable Energy	Policy SP13 supports renewable and low-carbon development proposals which contribute to meeting national and local renewables and low-carbon energy and energy efficiency targets.
Policy SP 18: Conservation of the Historic Environment	Policy SP18 aims to protect the historic environment within the County Borough. The policy states that *"development proposals must protect, conserve, and where appropriate, preserve and enhance historic assets".*

SPG 19: Biodiversity and Development (July 2014)[8]

3.1.19. SPG 19, which was published in July 2014, is part of a wider suite of Planning Practice Guidance published by the Council and used to inform and expand upon the existing biodiversity and green infrastructure policies within the LDP.

3.1.20. This SPG outlines how the Council will expect habitats to be considered as part of development proposals within the County Borough of Bridgend. Section A of the document introduces the concept of the 'green infrastructure approach'.

3.1.21. Paragraph 5.2 states that *'green infrastructure provides the spatial framework for a range of natural functions and uses. By adopting the Green Infrastructure Approach, development schemed may be adapted or designed to provide a range of important benefits'*.

Green Infrastructure

3.1.22. BCBC provides some brief information in regard to Green Infrastructure[9], which states that *'Bridgend Local Development Plan and our planning policies state, we are committed to enhancing and protecting Bridgend County Borough's natural assets. By considering the natural environment in your planned changes, you can help make Bridgend County Borough a greener, healthier place'*.

[8] Bridgend Borough Council (2014). SPG 19: Biodiversity and Development. Available at: https://uat.bridgend.gov.uk/residents/planning-and-building-control/local-development-plan/supplementary-planning-guidance/ [Accessed March 2025]
[9]Bridgend County Borough Council. Green Infrastructure Information. Available at: https://www.bridgend.gov.uk/residents/planning-and-building-control/green-infrastructure/ [Accessed March 2025]

NEATH PORT TALBOT COUNTY BOROUGH (NPTCBC) COUNCIL LOCAL DEVELOPMENT PLAN (LDP), ADOPTED JANUARY 2016[10]

3.1.23. The Neath and Port Talbot County Borough Council Local Development Plan was adopted in January 2016 and covers the plan period of 2011 – 2026. The LDP aims to help the County to look strategically and tackle the many challenges that they currently face, as well as providing the basis for decisions on land use planning in the County Borough.

3.1.24. The policies of greatest relevance to this statement are set out below in **Table 3-2**.

Table 3-2 - Neath Port Talbot County Borough Council LDP Relevant Policies

Adopted LDP Policy	Policy Summary
Policy SP 1: Climate Change	Policy SP1 is an overarching policy with the NPTCBC LDP, the measures highlighted within the policy should influence both the plan itself and proposals within the borough.
Policy SP 15: Biodiversity and Geodiversity	Policy SP15 aims to conserve, enhance and protect important species, habitats and sites of geological interest. Overall, it is considered that the Project will not result in significant negative impacts to important sites for nature and biodiversity.
Policy EN 2: Special Landscape Area	Policy EN2 highlights Special Landscape Areas which are *"protected as far as possible from any development that would harm their distinctive features and characteristics"*
Policy SP 18: Renewable and Low Carbon Energy	Policy SP18 aims to accord with national guidance and strategy and seeks to deliver proportionate contributions to meet Wales' national renewable energy targets and energy efficiency targets. Point (1) of the Policy states that, where appropriate all forms of renewable energy and low-carbon technology will be encouraged. The Project is considered to be both appropriate and necessary as it will enable a renewable energy project to be connected to the wider national grid.

SPG: Landscape and Seascape (May 2018)[11]

3.1.25. This SPG was published in May 2018 and provides information and guidance setting out the expectations on all development proposals to protect and enhance all landscapes and seascapes. Paragraph 3.1.5 of the SPG states that *'opportunities to enhance landscape character and minimise negative impacts should be addressed through the development, location, and design process'*.

[10] Neath Port Talbot County Borough Council (2016). Neath Port Talbot County Borough Council (NPTCBC) Local Development Plan (Online) Available at: https://www.npt.gov.uk/planning-and-building-control/planning-policy/ (Accessed on 07 February 2025).
[11] Neath Port Talbot County Borough Council (2018). SPG: Landscape and Seascape. Available at https://media.npt.gov.uk/media/j42dzulp/spg_landscape_seascape_may18.pdf?v=20241209172432 Accessed March 2025].

SPG: Biodiversity and Geodiversity (May 2018)[12]

3.1.26. The biodiversity and geodiversity SPG was published in May 2018 and provides information and guidance setting out the expectations on all development proposals to protect, conserve, enhance and manage important habitats, species and sites of geological interest.

Green Infrastructure Strategy

3.1.27. NPTCBC does not have a designated document highlighting Green Infrastructure.

3.2 GREEN INFRASTRUCTURE ASSETS

3.2.1. PPW12 (paragraph 6.12.13) states that green infrastructure statements should highlight any baseline data considered and surveys and assessments undertaken. The baseline ecology conditions are described in Draft ES **Chapter 8: Ecology**. Additionally, with regard to ornithology, the baseline conditions are described in **Appendix X of Chapter 8**.

3.2.2. In addition to the ecological aspects of the Project, consideration has been given to historic environment impacts (Draft ES Chapter 9: Historic Environment) and landscape impacts (Draft ES Chapter 6: LVIA), with extensive surveys undertaken and embedded measures included to reduce impacts. Consideration has additionally been given to the water environment (Draft ES Chapter 10: Water Resource and Flood Risk).

3.2.3. A summary of the site, surroundings, and GI assets is set out below.

SITE AND SURROUNDINGS

3.2.4. The Study Area encompasses an approximate 3km buffer on either side of the proposed cable route's site boundary. The northern section of the proposed OHL primarily traverses improved grassland and marshy grassland, with some areas extending into bracken, broadleaved woodland, and scrub. The southern section of the OHL crosses mainly improved and poor semi-improved grassland, with minor areas of broadleaved woodland, bracken, and marshy grassland.

3.2.5. Most of the underground cable (UGC) is situated within the existing built environment. A small section, approximately 250m in length, to the north of Nant-y-ffyllon (in the northern section of the route), passes through poor semi-improved grassland and areas of bracken before connecting to existing tracks. In the southern section of the route, approximately 350km of underground cable passes through parcels of semi-improved acid grassland south of Maesteg.

3.2.6. There are a number of Public Rights of Ways (PRoW) situated within the Study Area; other features of note include the Maesteg Golf Course. These are explored further within the Planning Statement and associated Draft ES Chapters.

National and Local Landscape Character

3.2.7. The Project is situated within multiple National and Regional Landscape Character Areas (LCA). The Site falls within the National Landscape Character Area (NLCA)[13] 37 Cymoedd y De/South Wales Valleys, which is described as having the following key characteristics:

[12] Neath Port Talbot County Borough Council (2018). SPG: Biodiversity and Geodiversity. Available at: https://media.npt.gov.uk/media/nqpnpgge/spg_biodiversity_geodiversity_may18.pdf?v=20241209172432 [Accessed March 2025]

[13] Natural Resources Wales (2021). National Landscape Character Areas (NLCA). Available online at: https://naturalresources.wales/evidence-and-data/maps/nlca/?lang=en. [Accessed 27 February 2025].

- *"Extensive upland plateaux – typically wild and windswept, often with unenclosed trats, running roughly north-south as 'fingers' parallel between intervening deep valleys; and*
- *Large blocks of coniferous plantation and deciduous woodland fringes – covering many steep hillsides and hilltops, most notably in the middle to the western portion of the area, providing a softer contemporary landscape where there was once industry"*

3.2.8. The northern section of the Project falls within the Landscape Character Assessment for Bridgend County Borough [14] LCA 1: Llangnwyd Rolling Uplands and Forestry, this is located along the north-western fringes of the County Borough, to the west of Maesteg, which is described as:

- *"Strongly undulating upland with a series of north-east facing slopes and has summits ranging from 120 to 365 metres AOD; and*
- *Dark, straight plantation edges providing a stark contrast to the adjacent muted grasslands on rounded slopes."*

3.2.9. A further two BCBC LCAs that coincide with the Project's ZTV and LVIA Study Area, these are:

- LCA 2 – Llynfi Valley Floor and Lower Slopes; and
- LCA 3 – Llynfi & Garw Uplands and Forestry.

3.2.10. There are also 12 LCAs within Neath Port Talbot as identified within Neath Port Talbot Landmap Landscape Assessment December 2004[15] which coincide with the ZTV and LVIA Study Area as LCA 3 – Margam Country Park;

- LCA 4 – Coedhirwaun;
- LCA 5 - Coedhirwaun Scarp and open scarp tops;
- LCA 7 – Mynydd Margam;
- LCA 8 - Goytre Valley;
- LCA 9 – Cefn Cethin;
- LCA 10 - Mynydd Bycham;
- LCA 11 – Cwm Afan and Cwm Pelenna;
- LCA 12 – Mynydd Penhydd;
- LCA 13 – Foel Trawsnant;
- LCA 14 – Foel Fawr; and
- LCA 18 - Mynydd Resolfen, Craig-y-Llyn & Mynydd Ynyscorrwg.

3.2.11. LCA 3 and 10 lie completely outwith the ZTV and so have been scoped out of the assessment. LCAs 4, 5, 8, 9, 11, 12, 14 and 18 have minimal to low ZTV coverage with some areas lying within forested areas reducing the visibility towards the Project, therefore, these have also been scoped out of the assessment.

3.2.12. Further information regarding the LVIA is situated within Chapter 6 of the Environmental Statement.

[14] LUC (2013). Landscape Character Assessment for Bridgend County Borough. Available online at: https://www.bridgend.gov.uk/media/1149/bridgend-landscape-character-assessment.pdf. [Accessed 27 February 2025].
[15] Neath Port Talbot LandMap Landscape Assessment https://media.npt.gov.uk/media/ponjgtte/spg_landmap_landscape_assessment_2004.pdf?v=20241209172433

LANDMAP[16]

3.2.13. LANDMAP is a complete all-Wales landscape resource where landscape characteristics, qualities and influences on the landscape are recorded and evaluated in a nationally consistent data set. The five LANDMAP spatial datasets are called the Geological Landscape, Landscape Habitats, Visual and Sensory, Historic Landscape and Cultural Landscape.

3.2.14. An assessment of the effects of the Project on LANDMAP Aspect Areas is set out within **Section 6.6** of **Draft ES Chapter 6: LVIA**. The selection of LANDMAP Aspect Areas included in the LVIA has been carried out in accordance with the methodology provided in Using LANDMAP in Landscape and Visual Impact Assessments[17].

3.2.15. There are no statutory landscape designations, such as National Parks or National Landscapes, within the Site or Study Area.

3.2.16. There are two locally designated Special Landscape Areas (SLAs) as defined by BCBC Designation of Special Landscape Areas – March 2010[18] within the Study Area and 2 SLAs as defined by NPTCBC Landscape and Seascape SPG (May 2018)[19]. These SLAs are:

- SLA 1: Foel y Dyffryn (BCBC);
- SLA 3: Western Uplands (BCBC);
- SLA 4: Margam (NPTCBC); and
- SLA 6: Foel Trawsnant (NPTCBC).

3.2.17. There are no historic landscapes situated within the Study Area.

Biodiversity

3.2.18. PPW12 (paragraph 6.12.13) states that green infrastructure statements should highlight any baseline data considered and surveys and assessments undertaken.

3.2.19. The baseline biodiversity conditions have been described within **Draft ES Chapter 8: Ecology**, as well as assessing the likely significant effects of the Project upon ecological receptors, outline mitigation measures proposed to reduce adverse effects and promote biodiversity gains and summarises the overall predicted ecological effects of the Project.

3.2.20. The Draft ES Chapter was informed by the following surveys and reports undertaken between September 2024 and September 2025:

Surveys Undertaken

- Preliminary Ecological Appraisal (PEA) 10 – 12.09.2024
- Bird scoping survey 30.01.2025
- Winter raptor roost survey 11.03.2025

[16] Natural Resource Wales. LANDMAP. Available at: https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/evidence-to-inform-development-planning/landmap-the-welsh-landscape-baseline/?lang=en [Accessed March 2025]
[17] Natural Resources Wales. (2021). Using LANDMAP in Landscape and Visual Impact Assessments GN46. (Online). Available at: https://naturalresourceswales.gov.uk/guidance-and-advice/business-sectors/planning-and-development/evidence-to-inform-development-planning/using-landmap-in-landscape-and-visual-impact-assessments-gn46/?lang=en (Accessed April 2024).
[18] BCBC SLA https://www.bridgend.gov.uk/media/3102/sd87.pdf
[19] NPTCBC SLA https://media.npt.gov.uk/media/j42dzulp/spg_landscape_seascape_may18.pdf?v=20241209172432

Planned Surveys

- Winter raptor roost survey 12.03.2025
- Breeding raptor surveys w/c 14.04.2025, w/c Mon 12.05.2025, and w/c 09.06.2025.
- Vantage point surveys (birds) – monthly, April to August 2025.
- Moorland bird survey - four visits from April to July 2025
- Breeding Night jar Survey – x 2 surveys in June and July 2025.
- Bat activity surveys – x3 static surveys. To be undertaken April, May and September 2025
- Night-time bat walkover – May 20205
- Bat roost survey – April 2025
- Otter surveys – 1st survey April 2025, and second survey September 2025.

3.2.21. The surveys undertaken demonstrate that the area where the overhead lines are proposed are comprised of x, y and z.

3.2.22. The value of the faunal species surveyed within the wider site are summarised below in **Table 3-3**.

Table 3-3 - Ecological Value of the Main Species Identified

Species	Value	Rationale
Bats	County	A total of 31 records of at least eight different bat species were returned during the desk study. A daytime bat walkover has been carried out, which identified trees within the Survey Area with suitability to support roosting bats. No confirmed roosts have been recorded to date. The Survey Area provides suitable habitat for foraging and commuting bats in the form of dense scrub, woodland, and linear habitats such as running water, tree lines and hedgerows.
Badger	Site	Two records of badger were returned during the desk study. No evidence of badger was present during the field survey. However, suitable habitat for commuting, foraging and sett-building existed within the Survey Area in the form of grassland, scrub and woodland, particularly in the southern extent.
Otter	County	A total of three records of otter were returned by the desk study. Watercourses throughout the Survey Area are suitable for supporting commuting and resting otter, with watercourses in the southern section also suitable to support foraging otter due to the likely presence of fish. Riparian habitats, notably the woodland habitats adjacent to watercourses in the southern section of the Survey Area, were also considered suitable to support commuting and resting otter.
Water vole	National	Evidence of water vole was recorded during two surveys carried out in 2024. The first of these surveys identified evidence of water vole in running water in the northern section of the Site. It was considered likely that water vole are present in the surrounding areas due to the suitability of the habitat, which includes acid and marshy grassland. The second of the two water vole surveys found water vole signs in this area to be lower in frequency. The water vole surveys did not identify any evidence of water voles in the southern section of the Site.
Other mammals (brown hare,	Site	Records of brown hare, hedgehog and harvest mouse were returned during the desk study. Although no evidence of these species has been recorded, the Survey Area is considered suitable to support these

hedgehog and harvest mouse)		species, within the mosaic of grasslands and hedgerows, and woodland edges.
Reptiles	County	Records of adder, common lizard, grass snake and slow worm were returned by the desk study. No evidence of reptiles was identified during the field survey. The habitats within the Survey Area were considered to provide suitability to support reptile species, with lower suitability in the southern section of the Survey Area due to a short sward height within the grassland. As the habitats on Site are suitable for reptiles, they are assumed to be present although they are unlikely to occur at high densities in the habitats affected.
Amphibians (excluding GCN)	Local	Records of common frog, common toad, and palmate newt were returned during the desk study. During the Phase 1 habitat survey, no amphibians nor evidence of amphibians were identified, however, suitable terrestrial habitat for common and widespread amphibian species was recorded in the form of scrub, grassland, and woodland habitat.
Breeding birds (common / widespread)	Local	Records of common and widespread species of birds were returned during the desk study. The habitats within the Survey Area were considered suitable for common and widespread breeding birds.
Protected or notable birds (including barn owl, goshawk, honey buzzard, nightjar)	National	The desk study returned records of protected and/or notable bird species. During the Phase 1 habitat survey, seven bird species were sighted or heard. These species were dipper, red kite, swift, house martin, skylark, wheatear and meadow pipit. It was also considered that some species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), such as red kite and honey buzzard, may nest in the habitats in the southern section of the Site. Habitats were identified with suitability for supporting moorland species including nightjar.
Fish	Local	One record of brown trout was returned by the desk study. The streams within the southern section of the Site are considered suitable to support brown trout.
Invertebrates	Site	A total of 50 invertebrate species which are listed as Priority Species in accordance with Section 7 of the Environment (Wales) Act 2016 were returned during the desk study. These species included small heath, anomalous, autumnal rustic, flounced chestnut, neglected rustic, sallow, and small phoenix. The habitats within the Site are considered suitable for supporting common and widespread species.

3.2.23. There are no statutory designated nature conservation sites situated within the boundary of the Project. The closest, Glaswelltiroedd Cefn Cribwr / Cefn Cribwr Grasslands SAC, is situated 4.3km to the south.

3.2.24. In terms of non-statutory designations, there are approximately four SINCS situated within the boundary of the Project.

3.2.25. **Table 3-4** below summarises the relevant ecological designations and their key attributes:

Table 3-4 - Statutory and Non-Statutory Designations

Designation	Nature Conservation Importance	Approximate Distance from the Site and Key Attributes
International Sites		
Glaswelltiroedd Cefn Cribwr / Cefn Cribwr Grasslands	SAC	4.3km south
Cwm Du Woodlands	SSSI	2.6km east
Cwm Cyffog	SSSI	7.1km east
Kenfig / Cynffig	SAC/ SSSI	6.1km southwest
Kenfig Pool and Dunes	NNR	6.1km southwest
Cwm Risca Meadow	SSSI	4km southeast
Bryn – Back, Cefn Cribwr	SSSI	4.6km southeast
Caeau Cefn Cribwr	SSSI	4km southeast
Waun Cimla	SSSI	3.9km south
Waun-fawr Cefn Cribwr	SSSI	5.4km south
Penycastell Cefn Cribwr	SSSI	4.9km south
Stormy Down	SSSI	5.9km south
Eglwys Nunydd Reservoir	SSSI	4.8km southwest
Margam Moors	SSSI	5.9km southwest
Blackmill Woodlands	SAC / SSSI	8.2km southeast
Local Sites		
Abercerdin Wood	Wildlife Site/ SINC (Adopted)	Within the project boundary.
Caerau West	Wildlife Site/ SINC (Adopted)	Within the project boundary.
Cwm Cerdin	Wildlife Site/ SINC (Adopted)	Within the project boundary.
Gilfach Uchaf	Wildlife Site/ SINC (Adopted)	Within the project boundary.
Nant-y-Castell Grasslands	Wildlife Site/ SINC (Adopted)	Within the project boundary.
Sychbant Fields	Wildlife Site/ SINC (Adopted)	0.2km west

Designation	Nature Conservation Importance	Approximate Distance from the Site and Key Attributes
Y Parc (south)	Wildlife Site/ SINC (Adopted)	0.4km north
Waun-y-Gilfach woods	Wildlife Site/ SINC (Adopted)	0.4km east
Y Parc (north)	Wildlife Site/ SINC (Adopted)	0.4km north
Cwn Sychbant	Wildlife Site/ SINC (Adopted)	0.4km north
Tudor West	Wildlife Site/ SINC (Adopted)	0.6 east
Llan Road Woods	Wildlife Site/ SINC (Adopted)	0.6 east
Cwm Cerwyn	Wildlife Site/ SINC (Adopted)	0.8km north
Caerau North	Wildlife Site/ SINC (Adopted)	0.8km north
Nant-y-Crynwydd	Wildlife Site/ SINC (Adopted)	1.0km south
Craig Tal-y-Fan	Wildlife Site/ SINC (Adopted)	1.2km east
Llwydarth Wood	Wildlife Site/ SINC (Adopted)	1.2km east
Drysity'n-y-waun	Wildlife Site/ SINC (Adopted)	1.2km east
Nant Brycynan Woods	Wildlife Site/ SINC (Adopted)	1.3km east
B-Lines	Bug Life – insect pathway	1.5km south
Afan Mineral Railway	Wildlife Site/ SINC (Adopted)	1.7km north
Ty'n-y-Waun	Wildlife Site/ SINC (Adopted)	1.9km east

3.2.26. Regarding arboriculture, it is considered that all existing trees on the Site are to be protected, with the majority being retained except for a small area of tree removal for the UGC. The root protection zones of any trees adjacent to the proposed works are to be protected by temporary fencing as outlined within BS 5837:2012.

3.2.27. **Draft ES Chapter 6: LVIA, Chapter 8: Ecology**, and the **Construction Environmental Management Plan (CEMP)** set out an assessment of likely effects on tree and hedgerow habitats and identifies likely mitigation, compensation or management requirements.

Historic Environment

3.2.28. **Draft ES Chapter 9: Historic Environment** sets out the relevant information highlighting the statutory and non-statutory historic designations in and near the Project.

3.2.29. The Draft ES Chapter has been informed by an Archaeological Desk-based Assessment (ADBA) prepared by Heneb: The Welsh Trust for Archaeology (2024). This was then further informed by a site visit carried out by Hene.

3.2.30. Another site visit was conducted by WSP on 19 and 20 February 2025 to undertake an additional baseline survey, including Stage 2 and 3 Settings Assessment of designated assets within a 3km Study Area in accordance with Cadw (2017) guidance. The following statutory historic designations have been identified and considered:

- Historic Landscapes;
- Scheduled Monuments; and
- Listed Buildings.

3.2.31. **Table 3-5** below details the statutory historic designations situated within the Study Area. Draft ES Chapter 9 details these further:

Table 3-5 - Designated Assets within the Site

Site Name	Designation	Approximate distance from the Site
Margam Mountain	Historic Landscape	Approx. 3.1km of the proposed cable route passes through the Historic Landscape.
Y Bwlwarcau Hillfort, Llangnwyd Middle (Cadw ref: GM059)	Scheduled Monument	250m west
Maesteg blast furnaces (Cadw ref: GM418)	Scheduled Monument	200m east
Maesteg Sports Centre, The Cornstores, Grade II* listed (Cadw ref: 11257)	Listed Building	300m east
Siloh Independent Chapel, Grade II listed (Cadw ref: 11356)	Listed Building	230m east
Blast Furnace at Maesteg Sports Centre, Grade II listed (Cadw ref: 18492)	Listed Building	290m east
Salem Welsh Baptist Chapel, Grade II* listed (Cadw ref: 18495)	Listed Building	115m east
Capel Saron, Grade II listed (Cadw ref: 18496)	Listed Building	210m east
Nantyffyllon Workmen's Institute, Grade II listed (Cadw ref: 18507)	Listed Building	260m east

3.2.32. There are four records of non-designated historic assets located within the Site boundary, whilst within the bounds of the scoping study area, there are a further 26 non-designated historic assets. These range from early medieval to post-medieval archaeological finds and features; however, these primarily consist of remains from 19th-century industrial activities like farmsteads and industrial structures.

3.2.33. An additional 37 non-statutory historic assets, as recorded by the RACAHMW, are located beyond the scoping boundary but within the study area. These primarily reflect the former industrial structures and infrastructure associated with the post-medieval and modern iron industry but also include prehistoric archaeological finds and features, including Iron Age enclosures and Bronze Age cairns.

Water Environment

3.2.34. The baseline conditions are described in **Draft ES Chapter 10: Water Resources and Flood Risk**, which also assesses the potential impacts of the Project on surrounding watercourses, waterbodies, surface water and groundwater.

3.2.35. The Project is set to cross a number of surface water features directly, as well as a number of features being situated within the Project's Study Area. All the water bodies that have been highlighted are located within the Western Wales River Basin District.

3.2.36. Ffrwd Wyllt is an ordinary watercourse and WFD-designated waterbody that is situated approx. 2km km to the west of the Project's boundary. To the south, there are two additional WFD-designated waterbodies within the study area; these are the Kenfig River, which is situated close to the western and southeast boundary of the Project and the River Lynfi, which is situated to the west of the Project.

3.2.37. In terms of Fluvial/ Tidal Flood Risk, the Project largely lies within Flood Zone 1, meaning that there is a low likelihood (less than 0.1%) of the Project being impacted by flooding. A small section of the UGC along the alignment of Nant Sychbant to the west of Y Parc crosses through a narrow Flood Zone 2 area, meaning that there is a 0.1 – 1% chance of flooding.

3.2.38. Further information regarding the Water Environment can be found in associated Draft ES Chapters.

4 SCHEME STRATEGY

4.1 OBJECTIVES AND DESIGN STRATEGY

4.1.1. Underlying the design of the Project is the intention to provide a grid connection for an approved wind farm. The wind farm will provide a source of renewable energy to support the energy needs of Wales, whilst also minimising significant environmental effects. This means that the overhead line element of the proposed grid connection has been located and designed to ensure that effects are minimised on ecology, historic assets, and the water environment and landscape through which the development passes. In addition, the proposed grid connection has been designed to ensure that the residential and environmental amenity of features in and around the site are protected.

4.2 THE PROPOSAL

4.2.1. The Project comprises of 66Kv grid connection, comprising of both overhead and underground cables.

4.2.2. Further information in relation to the design evolution of the Project is provided in the **Design and Access Statement,** which accompanies the application.

EMBEDDED ENVIRONMENTAL MEASURES

4.2.3. A number of embedded environmental measures are proposed as part of the development in order to reduce the environmental effects. These are detailed within the Environmental Statement, which accompanies this submission. A number of measures of key relevance to this statement have been summarised below:

Landscape and Visual

4.2.4. The Project has been developed through an iterative design process which considered balanced environmental, technical and economic factors. Minimising the number of potential visual receptors and reducing landscape effects by avoiding the requirement to create corridors through forested areas where possible, ensuring the Project is generally backdropped by existing forestry and/ or elevated topography and following the existing topography reflecting the guidance provided in the Holford Rules.

4.2.5. Landscape and visual mitigation of the Project has been embedded in the route selection process, which gives substantial weight to potential effects on landscape character, landscape designations and visual amenity.

4.2.6. In terms of construction and operation, the Project would include the following aspects of mitigation:

- Tidy site management to reduce visual clutter associated with the works (construction);
- Use of construction lighting in accordance with best practice to minimise lighting intrusion to surrounding sensitive receptors (construction);
- Presence of an OHL route. The height of the wooden poles will be between 11-15m above ground level (operation);
- Potential for localised tree pruning/cutting to retain clearance distances (operation).

4.2.7. Further information regarding the embedded mitigation measures for Landscape is found in Section 6.9 of **Draft ES Chapter 6: LVIA**.

Traffic and Transport

4.2.8. In terms of Traffic and Transport, details of embedded mitigation are located within the associated Outline CTMP and Outline PRoWMP that have been appended to the Chapter.

4.2.9. The Outline CTMP sets out the details of the impacts of the Project construction traffic on the road network and the mitigation measures and management strategy for the effects. The mitigation measures to be implemented include:

- Working hours;
- Escort vehicles;
- Timing of movements;
- Temporary traffic signage;
- Wheels/ street cleaning;
- Construction information packs and communications;
- Road condition surveys;
- Temporary traffic management; and
- Traffic diversions.

4.2.10. The Outline PRoWMP sets out details of the impacts of the Project on the PRoW network and the mitigation measures and management strategy for the effects. The three main overarching elements will form the PRoW mitigation measures as follows:

- Inspection and maintenance;
- Communication on Project works – commencement and programme; and
- Signage – Warning signage will be situated at appropriate PRoW junctions to warn users of construction works and unexpected vehicle movements.

4.2.11. Additional management measures that may be introduced include:

- The use of qualified personnel (banksperson) at key locations such as in the vicinity of Project access points, where construction traffic or PRoW users cross each other (with appropriate street works licences in place);
- Information provision and training to drivers regarding the content of the PRoWMP, including construction routes, protocols and Code of Good Practice; and
- Timing of works to minimise impacts on the PRoW network sections interacting with the Project and as a whole.

Ecology

4.2.12. A range of embedded mitigation measures have been implemented into the Project. The proposed measures include:

- Habitat loss will be avoided in the first instance to minimise the overall habitat loss resulting from the Project.
- Where habitats are subject to temporary loss, these will be replaced as soon as possible following construction.
- Disturbance to features that could support reptiles or amphibians (e.g. scrub, dense tussocky grassland, rocks) will be kept to a minimum, and works in these areas will take place outside the hibernation period for those species.

- The construction compounds for the consented wind farm development will be used for the construction of the OHL. Poles will be stored at the construction compound and transported to the works area on the day of installation.
- Biosecurity measures, such as boot wash stations, will be implemented throughout construction to avoid the introduction or spread of INNS
- Micro siting of the OHL route from the nearest point of linear/ foraging features considered likely to be well-used by bats such as treelines, woodland, and some waterbodies.

4.2.13. The full details of the embedded mitigation measures are within table 8-9 of Draft ES Chapter 8: Ecology.

Historic Environment

4.2.14. A range of embedded mitigation measures are proposed to be introduced regarding the Historic Environment. These include:

- The construction phase will be temporary, totalling 9 months, with 2 months planned for OHL installation.
- Micro-siting of H-pole pylon foundations (OHL), underground cable (UGC) or construction compound to avoid known historic assets.
- Avoidance maps of known non-designated historic assets within the CEMP.
- Micro-siting of H-pole pylon foundations (OHL), underground cable (UGC) or construction compound to avoid historic assets.
- Peat surveys were conducted to enable the identification of peat deposits of potential paleoenvironmental significance.
- Micro-siting H-pole foundations or underground cable routes to avoid disturbing known peat deposits.
- The proposed OHL design using wooden H-poles has kept effects on setting to a minimum.
- The underground cable route will not directly impact any designated assets, nor will it be visible due to its position below the ground.

4.2.15. Further details regarding these measures are located within **Section 9.8** of **Draft ES Chapter 9: Historic Environment**.

Water Environment

4.2.16. In terms of the Water Environment, the following embedded mitigation measures have been recommended, these have been informed by the Construction Environment Management Plan (CEMP) which has been prepared.

4.2.17. In terms of mitigation measures during construction, the following have been proposed:

- Existing access tracks will be used to transport construction materials to and from the compound;
- The method of works will consider the potential for impacts to Water Environment and Flood Risk receptors, particularly where works are undertaken within 10m of a surface water feature;
- Buffer strips and silt mitigation should be installed where works are within 10m of a surface water feature;
- Where possible, topographical gradients should be kept as shallow as possible in order to minimise the risk of watercourse contamination from silt runoff;
- Surface water runoff should be captured at the source and disposed of in accordance with best-practice guidance and allocated permits;

- The refuelling of construction and maintenance vehicles should be undertaken in a controlled area with measures in place to prevent spillages from contaminating surface water and groundwater resources, such as drip trays and bunds, if necessary;
- Regular visual inspection of watercourses in close proximity of current works should be undertaken to monitor changes to discolouration and identify increased sediment loading;
- Those conducting the works should have an understanding of the hydraulic connectivity of the site, including the watercourses and urban drainage networks, to ensure work can be undertaken in such a way that minimises pollution to sensitive water features;
- A permit may be required for the abstraction and discharge of water should dewatering of excavations be required during installation of the Project. Consultation with NRW is recommended once groundwater levels are better understood following ground investigation; and
- Any discharge of groundwater to receiving watercourses should be passed through appropriate treatment for sediment removal prior to discharge. Water should not be discharged during periods of high flow in receiving watercourses to reduce the risk of downstream flood risk.

4.2.18. In terms of mitigation measures during operation, the following have been proposed:

- The location of poles will be considered through detailed design to ensure they are located a minimum of 10m from the top of the bank of all watercourses and outside high-risk flood zones, while understanding there are a number of engineering design requirements that will also need to be satisfied through detailed design.

4.2.19. Further information relating to embedded mitigation is held with **Draft ES Chapter 10: Water and Flood Risk** and the **CEMP**.

5 GREEN INFRASTRUCTURE ASSESSMENT

5.1 DEMONSTRATING THE STEP-WISE APPROACH

5.1.1. PPW12 (paragraph 6.2.12) states that the green infrastructure statement must be used for demonstrating how the step-wise approach (illustrated in **Figure 3-1** of this document) has been applied.

5.1.2. Full details of the approach to mitigation and enhancement are provided in **Draft ES Chapter 8: Ecology** and the various supporting documents which have been produced. A number of the proposed embedded environmental measures have also been summarised in **Section 3** of this statement above.

5.1.3. The key aspects of the step-wise approach and a summary of the measures proposed for implementation in relation to the approach are set out in **Table 5-1** below:

Table 5-1 - Application of the step-wise approach at the site

Assessing Impacts on Habitats and Species Through the Step-Wise Approach	Measures Proposed for Implementation
Step 1 – Avoid	The proposed cable route has been designed in a precautionary manner, avoiding sensitive areas and taking into account impacts upon: ▪ Locally Designated Sites; ▪ Habitat features with the potential to support bat roosts; ▪ Breeding birds; and ▪ Habitat features with the potential to support the great crested newt and other protected/notable species
Step 2 – Minimise	The Project area does not contain any sites that are statutorily designated. The proposed cable route has been sensitively sited to minimise the impacts to: ▪ Locally Designated Sites; ▪ Habitat features with the potential to support bat roosts; ▪ Breeding birds; and ▪ Habitat features with the potential to support the great crested newt and other protected/notable species
Step 3 – Mitigate / Restore	The delivery of mitigation and restoration associated with the Project is set out within the relevant technical chapters and the CEMP.
Step 4 – Compensate On Site	Embedded mitigation measures have been incorporated into the design and construction of the Project to avoid, prevent or minimise significant adverse environmental effects where possible. These embedded mitigation measures are captured and discussed in the relevant technical chapters.
Step 4 – Compensate Off Site	Due to the absence of significant impacts, no offsite compensation has been included with all impacts and mitigation measures delivered within the footprint of the Project. As such, this step is not applicable.

Assessing Impacts on Habitats and Species Through the Step-Wise Approach	Measures Proposed for Implementation
Step 5 – Long-Term Management Plan and Additional Measures	The long-term approach to management is set out within the CEMP and relevant technical chapters.

5.2 DECCA FRAMEWORK

5.2.1. The DECCA Framework sets out the approach to net benefit through five key attributes;

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

5.2.2. Although the requirements for the Green Infrastructure Statement set out in PPW12 do not explicitly reference the DECCA Framework, the approaches described in **Draft ES Chapter 8: Ecology** and supporting documentation DECCA Framework summarise how it applied to the Project.

Diversity

5.2.3. Maintaining and enhancing diversity at every scale, including genetic, structural, habitat and between-habitat levels. This supports the complexity of ecosystem functions and interactions that deliver services and benefits. The Step-Wise approach has been used to avoid or minimise all impacts relating to biodiversity.

Extent

5.2.4. Steps to avoid loss of sensitive habitats have been included throughout the design phase, including the siting of the cable route away from key habitats and making use of existing roads for proposed access routes and the installation of underground cables in existing roads and lanes.

Condition

5.2.5. The long-term management and monitoring of habitats and species associated with the Project have been considered. Both direct and wider impacts should be considered; for example, avoiding or mitigating pressures such as climate change, pollution, invasive species, land management neglect, etc will help to enhance the condition of habitats on site and increase diversity and therefore the overall condition of the site.

5.2.6. Securing and enhancing non-statutory designated habitats will help to safeguard the site in the long-term and drive improvements of condition which would be unlikely to occur in the absence of the Project.

Connectivity

5.2.7. Connectivity refers to the links between and within habitats, which may take the form of physical corridors, stepping stones in the landscape, or patches of the same or related vegetation types that together create a network that enables the flow or movement of genes, species and natural

resources. Developments should take opportunities to develop functional habitat and ecological networks within and between ecosystems, building on existing connectivity.

5.2.8. Measures to enhance the site will increase potential connectivity between the site and adjacent habitats. In addition, the restoration of existing habitats is designed to decrease fragmentation to improve broader connectivity throughout the site. Existing public rights of way and access will be maintained. As a result, the connectivity of the area will remain unaffected by the proposal.

Adaptation

5.2.9. The step-wise approach has been used to ensure that loss of habitat is avoided and minimised and impacts on protected and priority species are appropriately mitigated where necessary.

5.2.10. The proposed mitigation measures should ensure that the site condition is retained and enhanced in such a way that biodiversity of the site is increased, securing biodiversity net benefit which would be unlikely to occur in the absence of the Project.

5.3 BUILDING WITH NATURE FRAMEWORK

5.3.1. PPW12 establishes the submission of proportionate Green Infrastructure Statements with planning applications and refers to the Building with Nature (BwN) Standards as good practice.

5.3.2. As set out within the BwN briefing 'Delivering High Quality Green Infrastructure in Wales', BwN is for all those engaged in placemaking who want to create better places for nature and people to thrive. It is an evidence-based framework of 12 quality standards that collectively define what good green infrastructure looks like. Its purpose is to help create resilient, healthy places where wildlife thrives, where people want to live, and which respond positively in a changing climate.

5.3.3. The assessment of the Project through the BwN Standards Framework offers a means of recognising and valuing the proposed green infrastructure. The six Core Standards create a solid foundation for the delivery of high-quality GI through design, planning and development. The Standards in the Wellbeing, Water and Wildlife themes build on this foundation. Each of the standards is set out in the tables below, with explanatory text and references to the supporting evidence which demonstrates how the standard is being met.

CORE STANDARDS

BwN Standard	Evidence	Assessment
Standard 1: Optimises Multifunctionality and Connectivity – the green infrastructure optimises multifunctionality and connectivity within the boundary of the project and links with the existing and planned for green infrastructure in the surrounding area	Environmental Impact Assessment (WSP, 2025) Outline CEMP (WSP, 2025) Outline PRoWMP (WSP, 2025) Outline CTMP (WSP, 2025)	The Project is for a small-scale grid connection to connect to the pre-consented Foel Trawsnant wind farm to the National Grid. The cable route will provide a vital connection to the wider national grid that will support the needs of Wales and contribute to the achievement of Climate Change objectives and move Wales towards its met zero carbon in 2050 target. The Proposed Route has been designed in order to be the most
Standard 2: Positively Responds to the Climate Emergency – the green infrastructure is designed to be climate-resilient by incorporating mitigation and adaptations that respond to the impacts of climate		

BwN Standard	Evidence	Assessment
change. The green infrastructure is designed to promote low carbon behaviours and contributes to achieving zero carbon development by optimising carbon sequestration and demonstrating low carbon approaches to design, construction and long-term maintenance		effective in terms of use of land, whilst also not negatively impacting any statutory and non-statutory environmental, historical or landscape constraints. It has been purposefully located away from sensitive receptors such as residential properties wherever possible. Therefore, due to the nature of the development, there are limited opportunities for multifunctional GI provision. However, through the supporting studies undertaken, the design of the development and the assessment outlined in the ES, it has been demonstrated how the proposals can exist within and support the use of multifunctional GI. An Outline PRoWMP has been produced to set out details of the impacts of the Project on the PRoW network and the mitigation measures and management strategy for the effects. An Outline CTMP sets out the details of the impacts of the Project construction traffic on the road network and the mitigation measures and management strategy for the effects. An Outline CEMP has been produced to outline the potential environmental impacts of the proposed construction works and the mitigation measures which will be used to minimise these.
Standard 3: Maximises Environmental Net Gains – the green infrastructure is designed to actively mitigate any unavoidable harmful environmental impacts of development on soil and air quality and to minimise light and noise pollution. In addition, it delivers environmental net gains, including improving air and water quality and wherever possible includes quiet spaces for people and wildlife.		
Standard 4: Champions a Context Driven Approach – the green infrastructure positively responds to the local context, including the physical environment, such as landscape and urban character and social, economic and environmental priorities, including the evidenced needs and strengths of existing and future local communities.		
Standard 5: Creates Distinctive Places – the green infrastructure is integral to the project and is designed to reinforce local distinctiveness and / or create a distinctive sense of place.		
Standard 6: Secures Effective Place-keeping – the green infrastructure is subject to management arrangements that demonstrate a commitment to effectively implement, establish and maintain features at all stages of the development process. This should include details of funding, governance, maintenance, monitoring, remediation and, where appropriate, community involvement and stewardship.		

WELLBEING STANDARDS

BwN Standard	Evidence	Assessment

Standard 7: Brings Nature Closer to People – The green infrastructure is close to where people live, work, learn, play and / or visit and is designed to optimise use and enjoyment for everyone across the year, to maximise health and wellbeing outcomes and to promote active living for existing and future communities.	Outline PRoWMP (WSP, 2025)	As set out above, the development has been designed in order to minimise impacts to residential amenity and therefore has been sited away from residential properties wherever possible. It is not envisaged that any stopping up or permanent diversion of existing rights of way will be necessary during either construction, operation or decommissioning, and potential effects on public rights of way during those periods can be mitigated by management. The routes will, therefore, remain open for public use. The Outline PRoWMP states that signage, inspection and maintenance will be utilised throughout the project.
Standard 8: Supports Equitable and Inclusive Places – the green infrastructure is designed to encourage and enable everyone, including those from vulnerable or excluded groups, to use and enjoy it, help reduce health inequalities and to build a shared sense of community and belonging.		

WATER STANDARDS

BwN Standard	Evidence	Assessment
Standard 9: Delivers Climate Resilient Water Management – the green infrastructure is integral to sustainable drainage using above ground features to manage flood risk, maintain the natural water cycle and improve water quality within the boundary of the project and at a catchment scale. The green infrastructure is designed to be drought resistant and, wherever possible, includes measures for the retention and the reuse of rainwater.	Outline CEMP (WSP, 2025) Water Resources and Flood Risk assessment (WSP, 2025)	The Draft ES is supported by a Water Resources and Flood Risk assessment, which is a qualitative assessment informed by professional judgement, based on experience and the use of best practice guidance, such as that published by the Natural Resources Wales (NRW), Environment Agency (EA), CIRIA and Defra. The significance of the effect resulting from the Project has been assessed with reference to the importance (or sensitivity/value) of a given receptor and the magnitude of the impact. A series of embedded measures are proposed, which have been detailed within the CEMP and Draft ES Chapter 10.
Standard 10: Brings Water Closer to People – the green infrastructure is designed to integrate water, including areas of standing water, flowing water, and seasonal and ephemeral features, to bring additional amenity and wildlife benefits.		

WILDLIFE STANDARDS

BwN Standard	Evidence	Assessment
Standard 11: Delivers Wildlife Enhancement – the green infrastructure optimises long-term and climate-resilient net benefits for nature by retaining and enhancing existing ecological assets and creating locally relevant new habitats within the boundary of the project. Wildlife measures are secured at all stages of implementation and, where applicable, across multiple phases of development.	Preliminary Ecological Appraisal (WSP, 2025) Environmental Statement, Ecology Chapter 8 (WSP, 2025) Conservation Plan (WSP, 2025)	A wide range of surveys have been completed, or are in progress, that will be used to understand the baseline ecology environment. These are outlined in more detail in Section 2.2 of this statement. Habitat management, mitigation, enhancement and monitoring measures have been designed to avoid or minimise potential impacts on Important Ecological Features (IEFs). This includes SINCs, Priority Habitats and ancient woodland, and protected and/or notable species supported by the habitats within the Site. These measures will be identified in a Conservation Plan to be agreed with the Local Planning Authority (LPA). The Conservation Plan will identify how the Project will achieve a net benefit for biodiversity, deliver ecosystem resilience and follow the stepwise approach. a CEMP will be prepared in advance of construction to minimise effects during the construction phase of the Project.
Standard 12: Underpins Nature's Recovery – the green infrastructure creates effective links with existing and planned ecological features and networks beyond the boundary of the project to support the creation and restoration of resilient ecological networks in the wider landscape.		

6 CONCLUSIONS

6.1.1. Through the approach undertaken to desktop studies and surveys, the design, and the assessment of the Project outlined within the Environmental Statement, it is demonstrated how the proposed use can exist within, and support the use of, green infrastructure. In particular, the DAS sets out the clear context for the Project and how the design has evolved as a result of the consideration of the surrounding environment.

6.1.2. As set out in **Section 4** of this Statement, the step-wise approach has been used to ensure that loss of habitat is avoided and minimised and impacts on protected and priority species are appropriately mitigated where necessary. Suggested mitigation and enhancement will be appropriately secured through the Outline CTMP, CEMP, and PRoWMP. These measures will ensure that a net benefit to biodiversity is provided.

6.1.3. As such, the Project is considered to comply with the requirements set out in PPW12 in respect of Green Infrastructure.

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