National Grid Energy Distribution

# UPPER OGMORE GRID CONNECTION

## Green Infrastructure Statement

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PUBLIC

National Grid Energy Distribution

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## Green Infrastructure Statement

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# 1 INTRODUCTION

## 1.1 BACKGROUND

1.1.1. This Green Infrastructure Statement has been prepared by WSP UK Ltd (WSP) on behalf of National Grid Energy Distribution (NGED) (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 Upper Ogmore Wind Farm, situated within South Wales, to the wider national grid (referred to as the 'Project' from here on).

1.1.2. The Project falls within the administrative bounds of two local planning authorities; the majority of the proposed route falls within Bridgend County Borough Council (BCBC), with the route partially traversing through Neath Port Talbot County Borough Council (NPTCBC) in two instances. In many sections, the route within BCBC lies directly adjacent to the authorities' boundaries.

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

1.1.4. 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.*

1.1.5. It has also been informed by the 'Delivering High Quality Green Infrastructure in Wales' briefing paper published by Building with Nature (November 2023) and other related guidance published by the relevant LPA.

## 1.2 SUMMARY OF THE PROJECT

1.2.1. The Project covers a total length of 9 km. The Route begins at an intersection with the Foel Trawsnant Grid Connection (DNS reference: DNS CAS-02505-N3T6M4), at a tee-off point connecting the grid connection to the wider national grid (NG Ref: SS 84115 93652). The Route begins as Overhead Line (OHL), traversing approximately 1.1km (referred to as the Western OHL section). Upon reaching Caerau, the route then transitions into Underground Cables (UCG) (referred to as the Western UGC section), following the existing highway network (A4063) for approximately 1.7km to the north (NG Ref: SS 87032 94984). Immediately before reaching Brynheulog Road, the route goes back to OHL (referred to as the Eastern OHL Section) for approximately 3 km to the east. To the northwest of Blaengarw, close to Mynydd Caerau, the route transitions back into UGC (referred to as the eastern UGC section) and continues west for approximately 3.2km. The

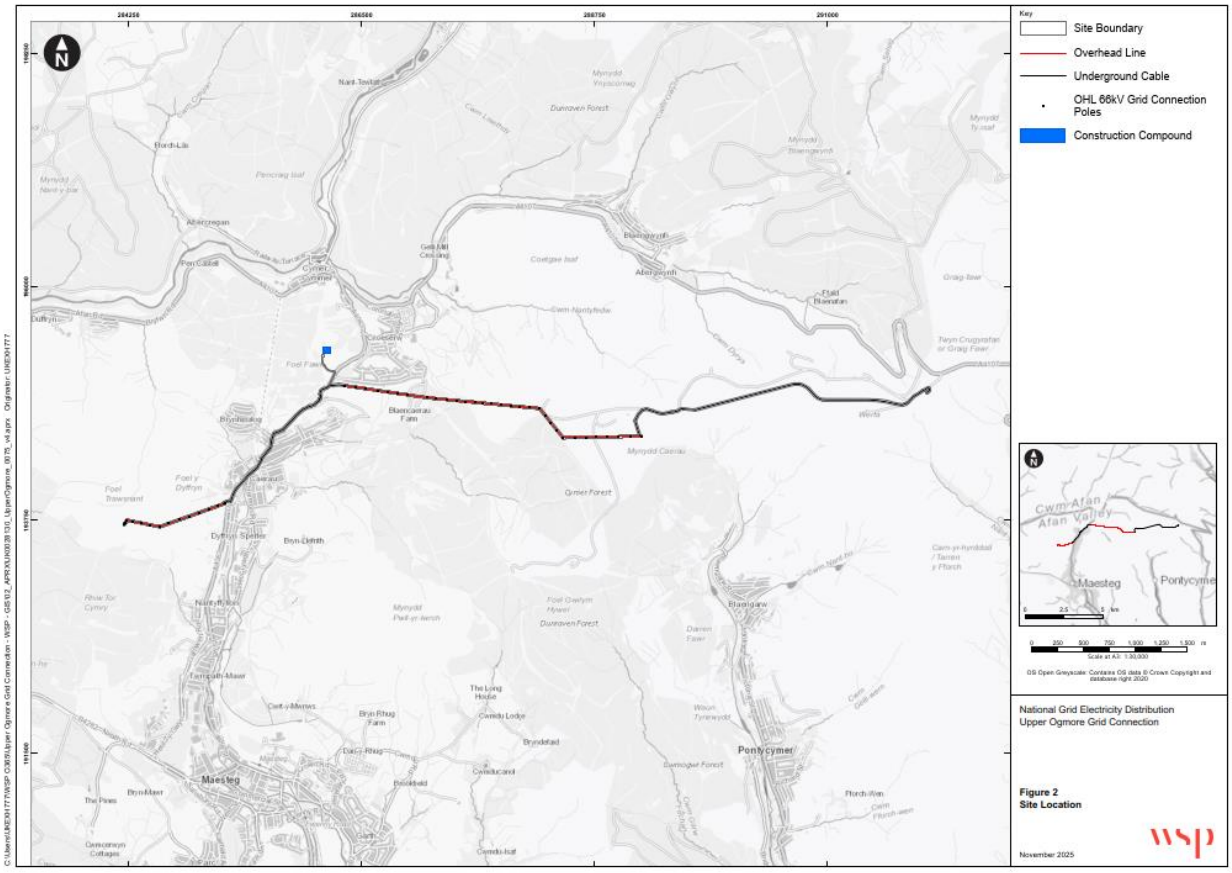
connection will finish at the previously consented Upper Ogmore Windfarm (NG Ref: SS 92011 95059).

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

- 4.1 km of overhead lines, including 104 wooden poles *(placed side by side to form the proposed H-Pole technology to support the overhead line – resulting in 52 H-Poles in total)*;
- 4.9 km of underground cable, including cable ducts and 18 joint bay boxes;
- Temporary working areas, e.g. construction compound; and
- Watercourse crossing(s).

1.2.3. Further information in relation to the Project and its objectives can be found within the accompanying PS and DAS. The site location is shown in **Figure 1-1** below. The red lines relate to the overhead sections. Black relates to underground cables.

**Figure 1-1: Site Location**




1.2.4. 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.

## 1.3 PURPOSE AND STRUCTURE OF THE REPORT

1.3.1. 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.

1.3.2. 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 in paragraph 6.1.14 within PPW, these standards represent good practice.

1.3.3. 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.

## 1.4 METHODOLOGY

1.4.1. 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 1-2** 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

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

Accreditation; the BwN Standards Framework has been used as good practice to assess the GI priorities and opportunities.

**Figure 1-2: Building with Nature Standards**

# 2 POLICY AND SITE CONTEXT

## 2.1 POLICY AND GUIDANCE

2.1.1. 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]

2.1.2. 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.

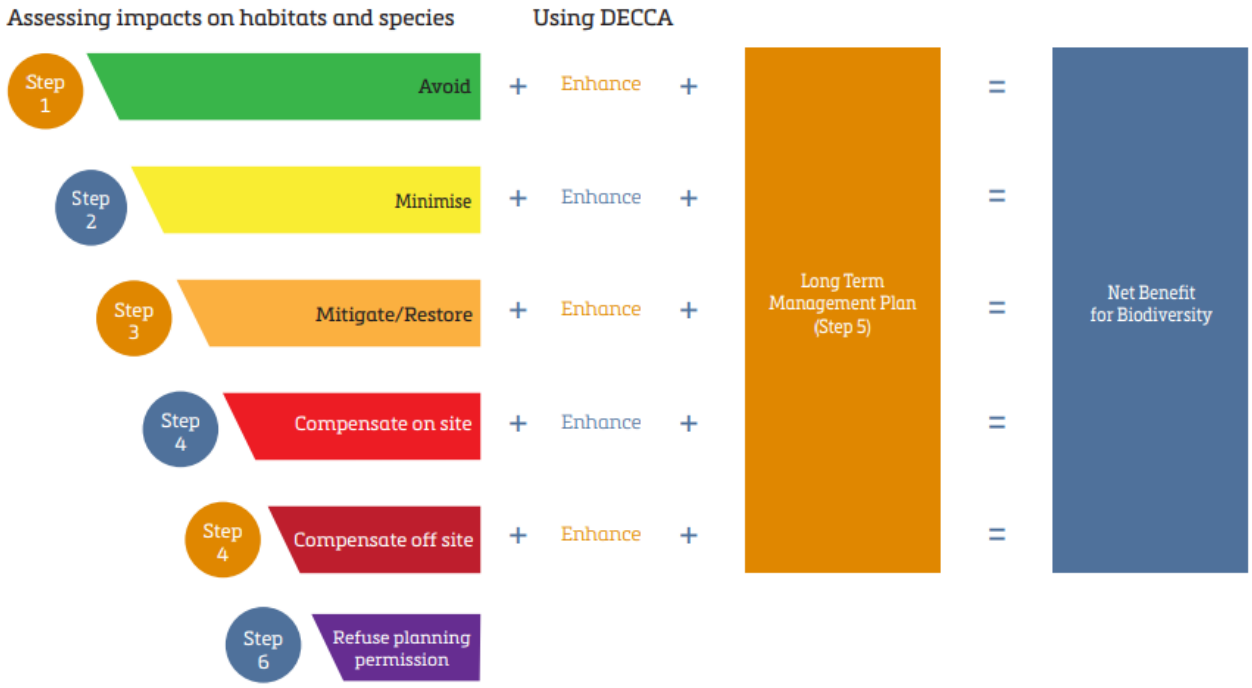
2.1.3. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental, and cultural well-being of Wales.

2.1.4. 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 2-1**.
- Paragraph 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 2-1: 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 is 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]**

2.1.5. 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.

[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).

- 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 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]**

2.1.6. 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.

2.1.7. 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.

2.1.8. 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.

2.1.9. It also deals with the conservation of internationally, 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]**

2.1.10. 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 Tydfil, and Rhondda Cynon Taff, as well as Cardiff.

2.1.11. 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'*.

2.1.12. 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]**

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

[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)

2.1.14. 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'*.

2.1.15. 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 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

2.1.16. 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]

2.1.17. 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.

2.1.18. The policies of greatest relevance to this statement are set out below in **Table 2-1**.

**Table 2-1: 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 the 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 are listed under point 8 as an acceptable use.<br>It 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.<br>There are three SLAs which are of relevance to the Project, as designated within Policy DNP 4. The Project travels through two Special Landscape Areas, SLA 1: Foel Y Duffryn and SLA 2: Northern Uplands.<br>Referring to the Landscape and Visual Impact Assessment (LVIA) undertaken as part of **the Draft ES Chapter 6**, that assesses the impact of the Project during construction and operation on the landscape and visual receptors |

[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 |
|---|---|
| | surrounding the Project, the assessment concludes that while the Project may have either a moderate to major effect on some receptors, overall it is considered that due to the nature of the Project and need for renewable development this is not considered to be a key planning issue, and not considered to be inappropriate.<br><br>Following consultation for the Scoping Decision, BCBC agree with the sentiment stated within the LVIA and has not highlighted that the Project would result in significant adverse effects on the SLAs. |
| 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".*<br><br>**Draft ES Chapter 8: Ecology** details the local and regional sites of importance situated near the Project. One Site of Importance to Nature Conservation (SINC), Caerau West, has been identified as being present within the Study Area of the Project. The site is not situated within the bounds of the Project itself.<br><br>Due to the nature of the Project and the proposed embedded mitigation, detailed in section 8.7 of Chapter 8, it is 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 DNP6 aims to achieve a balance between the need for development and the need to conserve biodiversity.<br><br>The policy states that *"all development proposals must provide a net benefit for biodiversity and improved ecosystem resilience".*<br><br>A Net Benefit for Biodiversity will be implemented within the Project, including that removed trees will be replaced at a 3:1 ratio. Enhancement of existing habitats will be undertaken to increase their conservation value. Wildflower seeding will take place in habitats with low species diversity. Long-term habitat monitoring of reinstated habitats will ensure that the Project achieves an NBB in the long term and when the Project is in its operational phase. All mitigation and enhancement measures will be agreed with the LPAs (BCBC, NPTC and RCTCBC). |
| 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.<br><br>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"*.<br><br>As stated within paragraph 8.14.5 of **Draft ES Chapter 8**, it is stated that as part of the NBB of the project, any trees removed will be replaced at a 3:1 ratio. |
| Policy SP 13: Decarbonisation and Renewable Energy | Policy SP13 supports renewable and low-carbon development proposals that 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.<br><br>The policy states that *"development proposals must protect, conserve, and where appropriate, preserve and enhance historic assets".* |

| Adopted LDP Policy | Policy Summary |
|---|---|
| | **Draft ES Chapter 10: Historic Environment** identifies historic assets within the vicinity of the Site, the chapter concludes that, providing the appropriate embedded mitigation measures are implemented, there will be no significant effects resulting from the Project. |

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

2.1.19. 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.

2.1.20. 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'.

2.1.21. 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 schemes may be adapted or designed to provide a range of important benefits'*.

**Green Infrastructure**

2.1.22. 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'*.

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

2.1.23. 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 it currently faces, as well as providing the basis for decisions on land use planning in the County Borough.

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

**Table 2-2: 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 within the NPTCBC LDP; the measures highlighted within the policy should influence both the plan itself and proposals within the borough. |

[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]
[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).

| | |
|---|---|
| Policy SP 15: Biodiversity and Geodiversity | Policy SP15 aims to conserve, enhance, and protect important species, habitats, and sites of geological interest.<br>Details of biodiversity enhancement are held within **Draft ES Chapter 8**. Overall, it is considered that the Project will not result in significant negative impacts on 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"*<br>The Project passes through one SLA as designated by NPTCBC, being SLA 5: Myndd Y Geli. Overall, it is considered unlikely that the project would result in an adverse impact on the SLA.<br>This is confirmed within the scoping consultation response from NPTCBC, which does not note landscape as a key constraint. |
| 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.<br>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]**

2.1.25. 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'*.

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

2.1.26. 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**

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

## 2.2 GREEN INFRASTRUCTURE ASSETS

2.2.1. 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 **Draft ES Chapter 9: Ornithology**.

[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].
[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]

2.2.2. In addition to the ecological aspects of the Project, consideration has been given to historic environment impacts (**Draft ES Chapter 10: 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 11: Water Resource and Flood Risk**).

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

## SITE AND SURROUNDINGS

2.2.4. The Study Area encompasses an approximate 3km buffer on either side of the proposed cable route's site boundary. The western OHL section predominantly travels through a mix of gorse scrub, modified grassland and upland acidic grassland. The western UCG travelling through Caerau is predominantly through the built environment, consisting mainly of residential properties.

2.2.5. Once the cable transitions back to the eastern OHL, it traverses through a mosaic of several habitat types. Initially, it passes through purple moor-grass and rush pastures for approximately 0.81km to the south of Brynheulog Road. The eastern OHL then passes through an area of other broadleaved woodland for approximately 0.13km, to the south of Croeserw, before continuing through areas of upland acidic grassland and upland rush pasture. A small part of the Project will traverse through the common of Mynydd Llangeinor, a designated common land unit 26 (CL26).

2.2.6. 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 ES Chapters.

### National and Local Landscape Character

2.2.7. The Project is situated within both National and Regional character areas. The Project falls entirely within the National Landscape Character Area (NLCA)[13] 37: Cymoedd y De/South Wales Valleys, which is described as having the following key characteristics:

- *"Extensive upland plateaux – typically wild and windswept, often with unenclosed tracts, 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"*

2.2.8. On a local level, as the Project sits on the administrative boundary of two County Borough Councils, the Site is covered by both the Landscape Character Assessment (LCA) for Bridgend County Borough [14] and Character Areas (CAs) for Neath Port Talbot Borough[15].

2.2.9. For BCBC, there are five identified LCAs in which the Project falls in to, being LCA 1: Llangnwyd Rolling Uplands and Forestry, LCA 3: Llynfi & Graw Uplands and Forestry, and LCA 6: Mynydd Llangeinwyr Uplands. The LCAs are described as follows.

[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].
[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

- LCA 1: This LCA is located along the north-western fringes of the County Borough, to the west of Maesteg. All of the landscape is defined as 'Upland' in LANDMAP's Visual & Sensory aspect (Level 2). The profile highlights that southern ridgelines offer panoramic views across the County Borough, including wind farm developments in distant skylines and that the LCA's tranquil qualities are eroded by the presence of pylon lines, telecommunication masts and urban fringe land close to Maesteg. One of the forces for change in this LCA is identified as prominent pylon lines traversing the southern half of the landscape, intruding into a landscape otherwise devoid of modern development.
- LCA 3: This LCA comprises an exposed upland landscape in the north of the County Borough, sitting to the east of Maesteg. All of the LCA is classified as 'Upland' in LANDMAP's Visual & Sensory aspect (Level 2). The profile highlights that a large proportion of the forest is open access land, accessible by forestry access tracks and public footpaths/bridleways. There is also a significant area of open access land at Mynydd Bach, and there are expansive, panoramic views across the county borough and beyond. One of the forces for change in this LCA is identified as views from lower levels dominated by development in the valleys and distant views of wind turbines, eroding feelings of remoteness. Also, high levels of exposure mean the landscape itself is likely to be under pressure for wind farm developments.
- LCA 6: Found in the north-eastern part of the County Borough, this remote, upland LCA is located between the Garw and Ogmore valleys. LANDMAP's Sensory and Visual aspect (Level 2) classifies all of the landscape as 'Upland'. The profile highlights that the uplands are traversed by footpaths and bridleways… and that most of the LCA is designated as statutory open access land. Also, telecommunications masts on the high summit of Werfa and above Blackmill, with long views westwards towards Ffynnon Oer windfarm in Neath Port Talbot and that the LCA has an overall remote and wild landscape, with a great degree of exposure. Forces for change in this LCA are identified as distant views of wind turbines in adjacent counties… eroding feelings of remoteness, and that high levels of exposure mean the landscape itself is likely to be under pressure for wind farm developments.

2.2.10. The Project also crosses through the following Cas as designated by NPTCBC, these are CA 11: Cwm Afan and Cwm Pelenna, CA 13: Foel Trawnant, and CA 15: Mynydd y Geli. These CAs are described as:

- CA 11: This character area follows the upland valleys of the Afan, Pelenna and minor tributaries. These deeply incised U-shaped valleys of sinuous alignment rise from approx. 50m AOD at Port Talbot to approx. 300m AOD at Abergwynfi. The profile highlights that there is substantial recreational use of the surrounding woodland [Afan Country Park] and that the valley has a dramatic and at times remote feeling away from the roads and settlements. Yet as views are generally contained within the valley by both vegetation and the topography, an intimate and sheltered nature is created.
- CA 13: This area of upland grazing ranges from approx. 220m AOD to 371m AOD at the summit. It is bounded to the east by the County Borough boundary, to the south by the woodland of Mynydd Penhrydd and to the north by the Afan Valley. The profile highlights that there are no dwellings or structural development present, and the only public access is via a

footpath and bridleway. Significant tracts of land surrounding access routes have been provisionally designated open county, and it has a bleak and exposed character.

- CA 15: The exposed upland rolling hillsides and valleys rise from approx. 250m AOD in the upper reaches of the Afan valley, which forms the northern fringe of the area, to 555m AOD to the south. The area is defined to the south by the County Borough boundary, although the character of the landscape continues beyond the assessment area. The profile highlights that this area contains a number of small valleys, tributaries to the Afan. The topography creates an imposing presence, which is enhanced by its simple cover of predominantly coarse grasses. The area provides a contrast to the more complex landscapes of the surrounding areas, creating a sense of exposure and wilderness after the enclosure of the valley. And that a number of footpaths provide additional access, and significant areas around these have been provisionally designated open county.

2.2.11. There are a further two LCAs, as identified by BCB, which have been assessed as part of the LVIA undertaken within Draft ES Chapter 6. A further four CAs as defined by NPTCBC. These are:

- LCA 5 – Garw Valley Floor and Lower Slopes
- LCA 7 – Ogmore Valley Floor and Lower Slopes
- CA 9 – Cefn Cethin
- CA 12 – Mynydd Penhydd
- CA 14 – Foel Fawr
- CA 18 – Mynydd Resolfen, Craig-y-Llyn & Mynydd Ynyscorrwg

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

2.2.13. There are two locally designated Special Landscape Areas (SLAs) as defined by BCBC Designation of Special Landscape Areas – March 2010[16] within the Study Area and two SLAs as defined by NPTCBC Landscape and Seascape SPG (May 2018)[17]. These SLAs are:

- SLA 10: Foel y Dyffryn (BCBC);
- SLA 11: Northern Uplands (BCBC);
- SLA 91: Mynydd Y Gelli (NPTCBC); and
- SLA 92: Foel Trawsnant (NPTCBC).

2.2.14. There are no historic landscapes situated within the bounds of the Project; however, there has been one identified within 2km of the Project, being the Rhondda, approximately 140 m from the Project.

**Viewpoints**

2.2.15. Further to the identification of character areas, the LVIA also used LANDMAP[18] to define key Visual & Sensory Aspect Areas (VSAA)[19].

[16] BCBC SLA https://www.bridgend.gov.uk/media/3102/sd87.pdf
[17] NPTCBC SLA https://media.npt.gov.uk/media/j42dzulp/spg_landscape_seascape_may18.pdf?v=20241209172432
[18] 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]
[19] 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).

2.2.16. 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.

2.2.17. The Project crosses through or has the potential to affect the character of the following VSAA.

- CYNONVS473 – Mynydd Baedan (Ref 15 on Figure 6.4);
- CYNONVS351 – Maesteg (Ref 13 on Figure 6.4);
- NPTVS215 – Upland Settlements (Ref 1 on Figure 6.4);
- CYNONVS811 – Garth Hill (Ref 19 on Figure 6.4);
- NPTVS547 – Mynydd y Gelli (Ref 6 on Figure 6.4);
- CYNONVS622 – Mynydd Llangeinwyr (Ref 12 on Figure 6.4);
- CYNONVS813 – Garw and Caerau Forest (Ref 20 on Figure 6.4);
- NPTVS465 – Foel Fawr (Ref 5 on Figure 6.4);
- NPTVS962 – Mynydd Nant y bar / Mynydd Blaenafan (Ref 9 on Figure 6.4); and
- NPTVS358 – Foel Trawsnant (Ref 2 on Figure 6.4).

2.2.18. In regard to visual impact, the LVIA utilised ZTV studies, baseline desk study and field-based observations to understand the extent of impact from the Project.

2.2.19. Fourteen viewpoints were taken, at varying distances and directions from the Project Site. The viewpoints are all representative of one or more receptor types, as well as being illustrative of restricted views in some instances.

2.2.20. A detailed summary of the studies highlighted above can be found within the **Draft ES Chapter 6: Landscape and Visual Impact Assessment**.

2.2.21. Overall, it is considered that due to the nature of the Project, there will likely be significant landscape and visual impact; however, as detailed further within the Planning Statement, the Project itself is considered to be vital for the

**Common Land**

2.2.22. The Project also passes through several areas of open access land – in Foel y Dyffyrn, south of Croeserw, and Mynydd Bach and Common Land at Mynydd Llangeinor. On the common, the connection will utilise underground cables, not overhead lines. This will ensure that, once construction is complete, the land will be available to be returned to its former for use. As a result, no replacement land is required as the common will be available as it was before the development took place, and access to this element of Green Infrastructure will continue as it is currently the case

**Biodiversity**

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

2.2.24. The baseline biodiversity conditions have been described within **Draft ES Chapter 8: Ecology** and **Draft ES Chapter 9: Ornithology**, as well as assessing the likely significant effects of the Project upon ecological receptors, outlining mitigation measures proposed to reduce adverse effects and promote biodiversity gains, and summarising the overall predicted ecological effects of the Project.

2.2.25. The Draft ES Chapters were informed by the following surveys and reports undertaken between August 2024 and October 2025:

**Surveys Undertaken**

- A Preliminary Ecological Appraisal (PEA), comprising a desk study and a UKHab survey in April and May 2024.
- Great Crested Newt, comprising a Habitat Suitability Index (HSI) Assessment and environmental DNA (eDNA)
- Bat survey, comprising Ground Level Tree Assessment (GLTA)
- Water vole survey
- Bat Aerial Tree Climbing survey
- Breeding raptor survey area
- Moorland Bird Survey
- Nightjar Survey

**Planned Surveys**

- Non-breeding Bird Surveys (due to be undertaken November 2025 – February 2025)
- Aerial tree climbing surveys of trees are ongoing to determine the likely absence or presence of bat roosts.

2.2.26. The value of the faunal species surveyed within the wider site is summarised below in **Table 2-3**.

**Table 2-3: Ecological Value of the Main Species Identified**

| Species | Value | Rationale |
|---|---|---|
| **Bats** | County | A total of 63 bat records of at least 7 bat species were returned during the desk study. The majority of records are associated with the residential area of Maesteg. The closest records are of common pipistrelle and unidentified bats c. 0.02 km east and west of the proposed route.<br><br>Seven confirmed bat roosts and two possible bat roosts were returned within the search area.<br><br>During the UKHab survey, a group of trees which were considered likely to be impacted by the Project were assessed as having suitability for supporting roosting bats. Further survey (aerial tree climbing) has been undertaken to provide additional information on these trees. The first survey visit was carried out on 28th May and 8th June 2025, which allowed a more detailed assessment of the trees (at height) and to ascertain their level of suitability for supporting bat roosts.<br><br>No evidence of roosting bats or signs of use have been found to date at the time of writing of this Chapter (October 2025), however, further survey visits are scheduled for trees classified as 'PRF-M' in November 2025 (to establish hibernation use), in accordance with best practice survey guidelines.<br><br>The majority of the Survey Area is not considered to be of high suitability for bats, with limited linear features for commuting and foraging, particularly within the uplands in the east to west section of the route.<br><br>An area of dense / continuous scrub south of Croeserw (which was previously classified as 'Other – Broadleaved Woodland' during the UKHab survey, is considered suitable for foraging and commuting purposes. |

| Species | Value | Rationale |
|---|---|---|
| **Water vole** | National | No records of water vole were identified within the search area during a desk top study.<br>Most of the aquatic and terrestrial habitats within the Site (and surrounding area) are considered to be of negligible suitability for water vole. However, some suitable habitat is present, confined to the south-western end, consisting of several small, connected streams and surrounding boggy purple moor grass and rush habitats (marshy grassland).<br>Targeted surveys for water vole were carried out in June and September 2024. The surveys concluded the presence of water vole within watercourses A and A.1, and the likely absence of water vole in watercourse A.2. |
| **Other mammals (brown hare, hedgehog and harvest mouse)** | Site | Records of brown hare were returned during a desktop survey. Open grassland habitats and adjacent woodlands associated with the eastern section and western end of the survey area may support brown hare, with records suggesting they are present locally. However, given the vast areas of open habitat in the surrounding upland area, a significant population is not anticipated within the survey area.<br>No records of harvest mouse were identified within the search area. |
| **Reptiles** | County | A total of 73 records of four reptile species were identified during the desktop study. |
| **Amphibians (excluding GCN)** | Local | A total of 73 records of four amphibian species were identified within the search area, including smooth newt, palmate newt, common toad and common frog. |
| **Breeding birds (common / widespread)** | Local | Breeding bird surveys were undertaken between April and July 2025 inclusive, target species and secondary species were identified from information within the desk study and those species were considered likely to occur on the Site. |
| **Protected or notable birds (including barn owl, goshawk, honey buzzard, nightjar)** | National | Breeding nightjar surveys were undertaken between June and July 2025 inclusive. Surveys comprised two survey visits during the breeding season (June and July) in 2025 and covered all suitable habitat within the Site boundary and a 500m buffer.<br>Bird species, including kestrel, red kite, and peregrine, were identified within the Study Area. |
| **Invertebrates** | Site | A total of 935 records of 132 invertebrate species were identified within the search area. Those of potential relevance include nationally scarce species, such as the red-necked footman *Atolmis rubricollis*, and locally important species such as green hairstreak *Callophrys rubi*. The Project does not fall within an Important Invertebrate Area (IIA). |

2.2.27. There are no statutorily designated sites within the bounds of the Project. An initial desk-top study identified two statutorily designated sites of international importance within 10km of the Project, with one being within 3km.

2.2.28. Regarding non-statutorily designated sites, 20 sites have been identified within 3km of the Site, comprising Sites of Importance for Nature Conservation (SINC) and Local Nature Reserves (LNR).

2.2.29. **Table 2-4** below summarises the relevant ecological designations and their key attributes:

**Table 2-4: Statutory and Non-Statutory Designations**

| Designation | Nature Conservation Importance | Approximate Distance from the Site and Key Attributes |
|---|---|---|
| **International Sites** | | |
| Blackmill Woodlands | SAC | 8.7km SE |
| Mynydd-Ty-isaf | SSSI | 0.5km NE |
| **Local Sites** | | |
| Caerau West | SINC | Within survey area |
| Caerau North | SINC | 0.08km W |
| Scotch Street | SINC | 0.09km NW |
| Tudor West | SINC | 0.09km NW |
| Parc Croeserw | SINC | 0.2km N |
| Nant-y-Wern | SINC | 0.3km N |
| Bryn Tip | LNR | 2.4km SW |

2.2.30. 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.

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

2.2.32. There are no areas of ancient woodland covering any part of the Survey Area, or on land adjacent to the Site. an initial desktop study identified one Plantation on Ancient Woodland Site (PAWS) within 1km of the Site.

**Historic Environment**

2.2.33. **ES Chapter 10: Historic Environment** sets out the relevant information, highlighting the statutory and non-statutory historic designations in and near the Project.

2.2.34. The ES Chapter has been informed by an Archaeological Desk-based Assessment (ADBA) prepared by Heneb: The Welsh Trust for Archaeology (2024) held within Appendix 10A of the ES. This was then further informed by a site visit carried out by Heneb. The ADBA provides an archaeological desk-based study and includes a review of available information to determine the baseline conditions within the route of the Project and surrounding 300m radius.

2.2.35. An additional baseline in the form of a Stage 2 and 3 Settings Assessment was undertaken by WSP in June 2025. The site visit confirmed the outcome of the Stage 1 Settings Assessment, verifying the locations of designated assets and assessing their rationale for inclusion or exclusion in the ES.

2.2.36. The following statutory historic designations have been identified and considered:

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

2.2.37. The baseline conditions of the Site are described within **Draft ES Chapter 10**, in total, 130 non-designated assets have been identified within the study area, which are predominantly related to post-medieval industrial and agricultural activities.

2.2.38. There are 15 non-designated historic assets located within the Site; there are a total of 37 designated historic assets present within the 2km extended study area, comprising 9 Scheduled Monuments, 27 Listed Buildings, and 1 Registered Historic Landscape.

2.2.39. There is one designated historic asset within the Site. This is the Clawdd Mawr, Mynydd Caerau scheduled monument (GM231), within the underground section of the Project.

2.2.40. **Table 2-5** below details the statutory historic designations situated within the Study Area. **Draft ES Chapter 10** details these further:

**Table 2-5: Designated Assets within the Site**

| Site Name | Designation | Approximate distance from the Site |
|---|---|---|
| **Historic Statutory** | | |
| Clawdd Mawr Dyke | Scheduled Monument | Within Project boundary |
| Mynydd Caerau Round Carins | Scheduled Monument | 75m |
| Blalch yr Avan Dyke | Scheduled Monument | 55m |
| Siloh Independent Chapel | Listed Building | 1.33km |
| Gelli Farm | Listed Building | 1.22km |
| Salem Welsh Baptist Chapel | Listed Building | 1.03km |
| Capel Saron | Listed Building | 1.58km |
| Nantyffyllon Workmen's Institute | Listed Building | 1.27km |
| Bethania Capel y Bedyddwyr (Welsh Baptist Chapel) | Listed Building | 1.83km |
| Cymmer Bridge | Listed Building | 1.21km |
| Cymmer Viaduct | Listed Building | 1.14km |
| Croeserw Viaduct | Listed Building | 980m |

| | | |
|---|---|---|
| Gelli Farm Cottage | Listed Building | 1.24km |
| Old longhouse at Nantyfedw | Listed Building | 855m |
| Stable at Nantyfedw | Listed Building | 865m |
| Bakehouse at Gelli Farm | Listed Building | 1.21km |
| Barn and Cow House at Gelli Farm | Listed Building | 1.23km |
| The Rhondda | Registered Historic Landscape | 140m |

2.2.41. The Stage 1 Assessment, undertaken in accordance with The Setting of Historic Assets in Wales (Cadw, 2017). From the results of the Stage 1 Settings Assessment, three scheduled monuments have been scoped in for further assessment within this ES.

2.2.42. Subject to the implementation of the embedded environmental measures set out in **Section 10.8** of **Chapter 10**, which includes archaeological monitoring and recording of potential non-designated archaeological remains situated within the footprint of the OHL poles and UGC, the micro-siting of OHL H-pole foundations to avoid impacting upon known designated and non-designated assets, and the protection measures implemented for Clawdd Mawr, Mynydd Caerau (GM231), the scheme will avoid significant effects to the historic environment.

**Water Environment**

2.2.43. The baseline conditions are described in **Draft ES Chapter 11: Water Resources and Flood Risk**, which also assesses the potential impacts of the Project on surrounding watercourses, waterbodies, surface water, and groundwater.

2.2.44. The only designated site within the Study Area is the Mynydd Ty-isaf Rhondda SSSI which is within the east of the Study Area and adjacent to the A4107; however, it is designated based on its biological importance and is not considered as being hydrologically important.

2.2.45. According to OS mapping, there are numerous (named and unnamed) ordinary watercourses and other surface water features (including springs and ponds) within the Study Area. A review of NRW Data Map Wales main rivers indicates that the Study Area encompasses the catchments of seven main (WFD) rivers, detailed further within section 11.8 of Chapter 11.

2.2.46. Baseline flood risk information was obtained from the Flood Map for Planning, in terms of rivers and sea, the FMfP indicates that there is limited risk of flooding from rivers adjacent to watercourse channels and floodplains, and no risk of flooding from the sea due to the inland location of the Project. A review of the FMfP identified that the risk of flooding from surface water and small watercourses is confined to watercourse floodplains and urbanised areas where surface runoff may exceed the capacity of drainage systems.

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

# 3 SCHEME STRATEGY

## 3.1 OBJECTIVES AND DESIGN STRATEGY

3.1.1. 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.

## 3.2 THE PROPOSAL

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

3.2.2. Further information in relation to the design evolution of the Project is provided in the **DAS,** which accompanies the application.

### EMBEDDED ENVIRONMENTAL MEASURES

3.2.3. 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. Several measures of key relevance to this statement have been summarised below:

#### Landscape and Visual

3.2.4. 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.

3.2.5. 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.

3.2.6. 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).

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

**Traffic and Transport**

3.2.8. In terms of Traffic and Transport, details of embedded mitigation are located within section 7.8 of **Draft ES Chapter 7** and the associated Outline CTMP and Outline PRoWMP that have been appended to the Chapter.

3.2.9. 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.

3.2.10. 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.

3.2.11. Additional management measures that may be introduced include:

- The use of qualified personnel (banks person) 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**

3.2.12. A range of embedded mitigation measures has been implemented in 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.
- Permanent habitat loss, if any, will be compensated for by enhancement/creation of new habitats.
- Where habitats are subject to temporary loss, these will be allowed to naturally regenerate 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.
- Construction works will be undertaken using all necessary and practical measures to minimise the release of dust, including: adequate dust suppression facilities on site, including water bowsers, use of enclosures and screening for on-site storage of aggregate or fine materials and good housekeeping arrangements and regular inspections to ensure measures remain suitable.
- No habitat loss will occur to facilitate the construction of site compounds or construction lay-down areas, with these proposed for areas of existing hard standing. Similarly, existing access routes will be used for construction to transport materials onto the Site, and no habitat loss is anticipated.

3.2.13. The full details of the embedded mitigation measures are within Tables 8-9 of Draft **ES Chapter 8: Ecology**.

**Historic Environment**

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

- The construction phase will be temporary, totalling 9 months, with 3 months planned for OHL installation.
- Micro-siting of wooden H-pole pylon foundations and underground cable to avoid known historic assets, where possible
- Avoidance maps of known non-designated historic assets within the CEMP.
- Where avoidance of physical impacts to archaeological remains is not possible, a proportionate programme of archaeological investigation and mitigation may be required, in advance of construction. The scope of any archaeological works will be agreed in advance with Heneb and set out in the Written Scheme of Investigation.
- Micro-siting pylon foundations or underground cable routes to avoid disturbing known peat deposits.
- Avoidance of the direct impacts on Clawdd Mawr, Mynydd Caerau scheduled monument (GM231) through appropriate design. Intrusive construction activities associated with the underground cable, where it crosses the scheduled area, will be contained entirely within the footprint of the existing trackway.
- Proposed OHL design using wooden H-poles and maximum height (mostly 12m above ground level, with a maximum height not exceeding 15m above ground) to minimise effects through change to setting.

3.2.15. Further details regarding these measures are located within **Section 10.8** of **Draft ES Chapter 10: Historic Environment**.

**Water Environment**

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

- In terms of mitigation measures during construction, the following have been proposed:
- The method of work will consider the potential for impacts where works are undertaken within 10 m of a surface water feature;

- Buffer strips and silt mitigation should be installed where works are within 10 m of a surface water feature
- Where possible, topographical gradients should be kept as shallow as possible to minimise the risk of watercourse contamination from silt runoff
- Surface water runoff should be captured at source and disposed of in accordance with good practice guidance and regulatory construction runoff 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 receptors, such as drip trays and bunds, if necessary
- Regular visual inspection of watercourses in proximity to current works should be undertaken to monitor changes to discolouration and identify increased sediment loading
- Those conducting the works should understand the hydraulic connectivity of the site, particularly between surface watercourses and drainage networks, to ensure work can be undertaken in such a way that minimises potential for pollution of receptors
- Any discharge of water should be passed through appropriate treatment for removal of soluble and sediment-bound pollutants before discharge; water should not be discharged during periods of high flow in receiving watercourses to reduce the risk of downstream flood risk.

3.2.17. Further information relating to embedded mitigation is held within section 11.9 of **ES Chapter 11: Water and Flood Risk** and the **CEMP**.

# 4 GREEN INFRASTRUCTURE ASSESSMENT

## 4.1 DEMONSTRATING THE STEP-WISE APPROACH

4.1.1. PPW12 (paragraph 6.2.12) states that the green infrastructure statement must be used for demonstrating how the step-wise approach (illustrated in **Figure 2-1** of this document) has been applied.

4.1.2. 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.

4.1.3. 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 4-1** below:

**Table 4-1: 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:<br>▪ Locally Designated Sites;<br>▪ Habitat features with the potential to support bat roosts;<br>▪ Breeding birds; and<br>▪ 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:<br>▪ Locally Designated Sites;<br>▪ Habitat features with the potential to support bat roosts;<br>▪ Breeding birds; and<br>▪ 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 off-site 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. |

## 4.2 DECCA FRAMEWORK

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

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

4.2.2. 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 is applied to the Project.

**Diversity**

4.2.3. 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**

4.2.4. 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**

4.2.5. 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.

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

**Connectivity**

4.2.7. 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.

4.2.8. 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**

4.2.9. 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.

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

## 4.3 BUILDING WITH NATURE FRAMEWORK

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

4.3.2. 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.

4.3.3. 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 that 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)<br><br>Outline CEMP (WSP, 2025)<br><br>Outline PRoWMP (WSP, 2025) | The Project is for a small-scale grid connection to connect the pre-consented Foel Trawsnant wind farm to the National Grid.<br><br>The cable route will provide a vital connection to the wider national grid that will support the needs of |

| BwN Standard | Evidence | Assessment |
|---|---|---|
| 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 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 | Outline CTMP (WSP, 2025) | Wales and contribute to the achievement of Climate Change objectives and move Wales towards its met zero carbon in 2050 target.<br><br>The Proposed Route has been designed in order to be the most effective in terms of use of land, whilst also not negatively impacting any statutory and non-statutory environmental, historical or landscape constraints.<br><br>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.<br><br>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.<br><br>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.<br><br>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.<br><br>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.<br><br>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. | 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.<br><br>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.<br><br>The Outline PRoWMP states that signage, inspection and maintenance will be utilised throughout the project.<br><br>Part of the Site is within Mynydd Llangeinor, which is designated as Common Land. At this location, the connection will utilise underground cables, not overhead lines. This will ensure that, once construction is complete, the land will be available to be returned to its former for use. As a result, no replacement land is required as the common will be available as it was before the development took place, and access to this element of Green Infrastructure will continue as it is currently the case. |

## 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 | Outline CEMP (WSP, 2025)<br><br>Water Resources and Flood Risk Assessment (WSP, 2025) | The 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 |

| | | |
|---|---|---|
| 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. | | published by the Natural Resources Wales (NRW), Environment Agency (EA), CIRIA and Defra.<br><br>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.<br><br>A series of embedded measures are proposed, which have been detailed within the CEMP and 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)<br><br>Environmental Statement, Ecology Chapter 8 (WSP, 2025)<br><br>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.<br><br>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.<br><br>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. | | |

# 5 CONCLUSIONS

5.1.1. 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.

5.1.2. Whilst part of the project will pass through Common Land, the connection at this location will utilise underground cables, not overhead lines. This will ensure that, once construction is complete, the land will be available to be returned to its former for use. As a result, no replacement land is required as the common will be available as it was before the development took place and access to this element of Green Infrastructure will continue as its currently the case.

5.1.3. 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.

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

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