Appendix 8H
Net Benefit for Biodiversity Report (Outline)

November 2025

NGED

UPPER OGMORE GRID CONNECTION

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EXECUTIVE SUMMARY

National Grid Electricity Distribution commissioned WSP UK Ltd to provide ecological support for the Upper Ogmore grid connection project. The Project is to install overhead lines (OHL) and underground connections (UGC) to link with the Upper Ogmore Wind Farm. The Site is located south of Croeserw and centred at Grid Reference (E) 287980, (N) 194848. It is approximately 9km long split into four sections:

- 1.1 km western OHL;
- 1.7 km western UGC;
- 3.0 km eastern OHL; and
- 3.2 km eastern UGC.

WSP was commissioned by NGED to produce a Net Benefit for Biodiversity (NBB) report to support and to guide the Project to meeting Welsh policy requirements on NBB and ecosystem resilience. Welsh policy advises that developments in Wales must demonstrate they have maintained and enhanced biodiversity and created resilient ecological networks. The NBB approach puts the emphasis on the proactive consideration of biodiversity and wider ecosystem benefits early in the design process. This has been considered throughout the Project's planning stages by conducting ecological surveys and adopting the 'stepwise approach'.

The 'stepwise approach' aims firstly to avoid, then minimise, mitigate, and as a last resort, compensate for adverse impacts on the environment that occur as part of a development. By following this approach, as detailed within this report, the Project will have the opportunity to fulfil its intention in creating the proposed grid connection, whilst also providing an enhanced area for biodiversity. The measures discussed will lead to an overall NBB and improve ecosystem resilience. The measures have been designed to support the objectives listed in the DECCA Framework.

For the Project to provide NBB in the long-term; management and monitoring requirements are recommended. These include habitat management over a 5-year period, inclusive of a management and monitoring plan for maintaining habitats of high biodiversity value including Priority Habitats. Regular reviews of the Conservation Plan will be required to assess its success and to make alterations where necessary.

1 INTRODUCTION

1.1 PROJECT BACKGROUND

1.1.1 WSP UK Ltd (hereafter referred to as ‘WSP’ has been commissioned by National Grid Electricity Distribution (NGED) provide a Net Benefit for Biodiversity (NBB) assessment to support the proposed Upper Ogmore Grid Connection (the ‘Project).

1.1.2 The Project is to install overhead lines (OHL) and underground cables (UGC to link with the Upper Ogmore Wind Farm. The ‘Site’ is located within Bridgend County Borough Council (BCBC) and Neath Port Talbot County Borough Council (NPTCBC). The Site (Figure 8H.1) is located south of Croeserw and centred at Grid Reference (E) 287980, (N) 194848.

1.1.3 The Project is approximately 9 km long split into four sections:

- 1.1 km western OHL;
- 1.7 km western UGC;
- 3.0 km eastern OHL; and
- 3.2 km eastern UGC.

1.1.4 The UGC element of the Project will include using an open cut method to construct a trench along the existing road networks, and placing cables and ducts within the trench.

1.1.5 The OHL element of the Project will involve carrying the OHL on wooden H poles, consisting of two single wooden poles joined by a crossarm with bracing. At the termination points only, two sets of H poles will be located side by side. The poles will mostly be 12 m above ground level in height (extending to a maximum of 15 m in height), and the span length between poles will be between 90 m and 130 m (influenced by topography and the surrounding environment). The OHL route will be installed as straight as possible although there will be some deviations to avoid environmental features such as trees, where practicable. The Project also allows for a 10 m micro siting within the design, to aid specific placement of the OHL poles to further minimise impacts on sensitive habitats.

1.2 EXISTING SITE AND SURROUNDINGS

1.2.1 Starting at the western-most section (Figure 8H.1), the route begins at an intersection with the Foel Trawsnant Grid Connection (DNS reference: DNS CAS-02505-N3T6M4) to the west of the A4063 near Caerau, as western OHL for approximately 1.1 km. As the route reaches Caerau, the route then transitions into western UCG, following the existing highway network for approximately 1.7 km to the north. Immediately before reaching Brynheulog Road, the route goes back to eastern OHL for approximately 3 km to the east. To the northwest of Blaengarw, close to Mynydd Caerau, the route transitions back into eastern UGC and continues west for approximately 3.2 km.

1.2.2 The western-most OHL section predominately travels through a mix of gorse scrub, modified grassland and upland acidic grassland. The northern section of the UCG travelling through Caerau is predominantly through built environment, consisting mainly of residential properties. Once the cable transitions back to an OHL, it traverses through a mosaic of several habitat types. Initially, it passes through purple moor-grass and rush pastures for approximately 0.81 km to the south of Brynheulog Road. The OHL then passes through an area of scrub for approximately 0.13 km, to the south of Croeserw, before continuing through areas of upland acidic grassland and upland rush pasture.

1.3 THE NEED FOR NBB

1.3.1 The requirement for a development to achieve a NBB is secured in Welsh planning policy through Edition 12 of Planning Policy Wales (PPW) (Welsh Government, 2024). This includes an approach to delivering NBB in Wales, with the onus being placed on demonstrating both a measurable NBB and promoting ecosystem resilience. The NBB approach intends to deliver an overall improvement in biodiversity. It does not utilise a metric. It instead assesses improvement in biodiversity qualitatively, putting the emphasis on proactive consideration of biodiversity and wider ecosystem benefits within a placemaking context early in the design process. This approach encourages the consideration of features that may not necessarily be protected, but are crucial for ecosystem functioning, leading to more joined up spaces for nature. There is no mandatory length of time for which post-construction management is required in Wales.

1.3.2 Whilst the requirement for a DNS application is triggered by the OHL section, the whole of the Project will require DNS consent. This report focuses mainly on the OHL section as generally, the UGC sections of the Project is located within the existing road networks and therefore is not considered to affect ecological receptors. An exception to this is where the easternmost UGC (and a very small length of the westernmost UGC) is located within acid grassland habitat. Discussions for acid grassland removal is therefore included within this report.

1.4 ECOLOGICAL BACKGROUND

1.4.1 Various ecological surveys and assessments have been completed in support of the Project, to provide a comprehensive ecological baseline for the Site. Such surveys and assessments include:

- A Preliminary Ecological Appraisal (PEA)[1], comprising a desk study and a UKHab survey in April and May 2024. The PEA identified various habitats on Site with suitability to support a range of protected and/or notable species;
- Great Crested Newt *Triturus cristatus* survey[2] (GCN) in June 2024, comprising a Habitat Suitability Index (HSI) Assessment and environmental DNA (eDNA) to determine the presence or likely absence of the species;
- Bat survey[3], comprising Ground Level Tree Assessment (GLTA) in September 2024; and
- Water vole *Arvicola arvensis* survey[4], comprising a search for field signs in June and September 2024[5]; and
- Bat Aerial Tree Climbing survey[6]; and
- Ornithology surveys (breeding season) in 2025[7].

1.5 PROJECT

1.5.1 The Project will consist of the following:

UNDERGROUND CABLING WORK

1.5.2 Installation of UGCs: underground cabling work will involve placing cables and ducts within trenches. An open cut method will be used to create the trenches along the

[1] CSA Environmental (2024). Upper Ogmore Wind Farm – Preliminary Ecological Appraisal, August 2024. Report No: CSA/6891/01
[2] CSA Environmental (2024). Upper Ogmore Wind Farm, Maesteg – Great Crested Newt Report, November 2024. Report No. CSA/6891/02
[3] CSA Environmental (2024). Upper Ogmore Wind Farm – Bat Survey Report, November 2024. Report No: CSA/6891/03
[4] CSA Environmental (2024). Foel Trawsnant Wind Farm – Water Vole Survey Report, November 2024. Report No: CSA/7086/04.
[5] The water vole survey was undertaken by CSA Environmental in support of two different development proposals (Upper Ogmore Grid Connection and Foel Trawsnant Grid Connection). Whilst the report title references Foel Trawsnant only, the development boundaries overlap and the water vole survey area encompasses all areas of suitable water vole habitat identified within the Upper Ogmore Site, isolated to the south-western end of the Project. This report and survey data is therefore considered relevant for this Proposed Development.
[6] WSP (2025). Upper Ogmore Grid Connection – Bat Aerial Tree Climbing Survey Report (October 2025).
[7] WSP (2025). Upper Ogmore Grid Connection – Combined Ornithology Survey Report (November 2025).

existing road network and all works will follow the standard industry best practice technique for installation of underground cables..

1.5.3 **OVERHEAD LINE WORK**

1.5.4 Installation of OHL: carried on wooden H poles, consisting of two single wooden poles joined by a crossarm with bracing. At the termination points only, two sets of H poles will be located side by side. The poles will mostly be 12 m above ground level in height (extending to a maximum of 15 m in height), and span length between poles will be between 90 m and 130 m (influenced by topography and the surrounding environment). The OHL route will be installed as straight as possible although there will be some deviations to avoid environmental features such as trees, where practicable.

CREATION OF A TEMPORARY CONSTRUCTION COMPOUND

1.5.5 Construction of a temporary compound to be used during the construction phase, The compound will measure approximately 30 m x 30 m and be located west of the Site, on an area of existing hard standing. No excavation or site clearance will be required to facilitate creation of the temporary construction compound.

OPERATION

1.5.6 The Project will integrate the consented Upper Ogmore Wind Farm and will remain active for the duration of the wind farm operation (assumed up to 30 years).

DECOMMISSIONING

1.5.7 The Project will be left in situ and has potential to become integrated into NGEDs wider distribution network.

HABITAT LOSS

1.5.1 No new access tracks will be constructed currently, though this may change depending on topographical constraints. Access to the Site will be primarily provided via the existing access track for the consented Upper Ogmore Wind Farm, which branches off from the A4107.

1.5.2 Vegetation clearance is proposed to be kept to a minimum through ‘micro-siting’ or precise placement of OHL poles. Furthermore, where required, clearance of habitat will be temporary wherever possible. The Project will lead to permanent and temporary habitat loss. Where habitat loss is temporary, these areas will be allowed to naturally regenerate following the completion of the Project. Any permanent habitat loss will be appropriately compensated. Under the current Project design, two trees are also considered ‘at risk of being impacted.

1.5.3 All opportunities for habitat retention have been taken into consideration. Where it is possible, habitat retention would be the most desirable option for biodiversity.

1.6 SCOPE OF REPORT

1.6.1 In response to recent developments in Welsh policy on NBB and ecosystem resilience, WSP was commissioned by NGED to produce a NBB report to support the planning application.

1.6.2 The aim was to assess if the Project achieves an NBB whilst also promoting ecosystem resilience, thus demonstrating compliance with planning requirements. The scope of this report is to:

- Provide an overview of the relevant ecological assessments that have informed the Project;
- Provide an overview of the approach used to assess biodiversity enhancement and ecosystem resilience;
- Summarise the legislative and policy requirements that shaped the assessment;
- Discuss the ecological baseline of the Site and its ecosystem value;
- Provide details of habitats lost to the Project;
- Provide details of mitigation measures provided following the 'stepwise approach'[8];
- Provide examples of how the Project promotes the resilience of ecosystems through reference to the DECCA Framework;
- Summarise the NBB assessment conclusion; and
- Provide future management and monitoring requirements.

1.7 RELEVANT LEGISLATION AND POLICY

1.7.1 The report has been compiled with reference to the following relevant nature conservation legislation and planning policy from which the protection of sites, habitats and species is derived in Wales. Relevant information regarding legislation/planning policy which is relevant to the Project and achieving a NBB is detailed in Appendix A and is listed below:

- The Environment (Wales) Act 2016;
- The Wellbeing of Future Generations Act 2015;
- Nature Recovery Action Plan Wales (NRAP) – the Biodiversity Strategy for Wales. Part 1: Our Strategy for Nature (2015) and Part 2: Nature Recovery Action Plan (2020 – 2021);
- PPW 2024 (Edition 12);
- Future Wales – The National Plan 2040;
- The DECCA Framework (see Section 1.7);
- Replacement Neath Port Talbot CBC Local Development Plan 2023-2038; and
- Replacement Bridgend Local Development Plan 2018 to 2033.

1.8 STEPWISE APPROACH AND COMPENSATION

1.8.1 Biodiversity enhancements that achieve NBB must be delivered following the implementation of the 'stepwise approach' of firstly avoiding, then minimising, mitigating and, as a last resort, compensating for adverse impacts on the environment that occur as part of a development. Compensation should only be considered as a last resort, where it has been demonstrated clearly that adverse effects on the environment cannot be avoided or fully mitigated. If compensation is necessary, this must be

[8] See Section 1.6 for further information about the 'stepwise approach'.

delivered on-site where possible but off-site compensation can be sought if demonstrated that on-site compensation is not possible.

1.8.2 This approach will encourage the consideration of features that may not necessarily be protected, but are crucial for ecosystem functioning, leading to more joined up spaces for nature.

1.9 DECCA FRAMEWORK

1.9.1 PPW 2024 instructs planning authorities to take account of and promote the resilience of ecosystems when assessing planning applications.

1.9.2 Natural Resources Wales (NRW) have developed a framework for evaluating ecosystem resilience based on five attributes and properties specified in the Environment (Wales) Act 2016. This is referred to as DECCA and comprises the objectives listed:

- Diversity – 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.
- Extent – incorporating measures which maintain and increase the area of semi-natural habitat/features and linkages between habitats. In general, smaller ecosystems have reduced capacity to adapt, recover or resist disturbance.
- Condition – the condition of an ecosystem is affected by multiple and complex pressures acting both as short term and longer-term types of disturbance. 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.
- Connectivity – this 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.
- Adaptability to change – ecosystem resilience is a product of the above four attributes. Adaptability, recovery and resistance to/from a disturbance are defining features of ecosystem resilience.

1.9.3 NRW define ecosystem resilience as “An environment that can respond to pressures by resisting, recovering or adapting to change, and is able to continue to provide natural resources and benefits to people”.

1.9.4 NRW has a duty to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used. Article 4 of the Natural Resource Body for Wales (Establishment) Order 2012 (Welsh Government, 2012) sets a general purpose for NRW to pursue the Sustainable Management of Natural Resources (SMNR) in the exercise of its functions. In order to achieve this, NRW applies a set of 9 principles: adaptive management, scale, collaboration and engagement, public participation, evidence, multiple benefits, long term (consequences of actions), preventative action, and building resilience.

1.9.5 Importantly, the objective of the SMNR is to maintain and enhance the resilience of ecosystems and the benefits they provide and, in so doing, meet the needs of present generations of people without compromising the ability of future generations to meet their need, and contribute to the achievement of the goals of the Well-being of Future Generations Act 2015.

2 SITE BASELINE

2.1 CURRENT BIODIVERSITY VALUE

2.1.1 The Site is split into two distinct areas; a western and an eastern section as shown in Figure 8H.1. The western area of the Site is located to the west of the village of Caerau and runs through Caerau itself; and the eastern section of the Site is located to the east of Caerau. Both areas of the Site are situated within rural areas to the north of Maesteg.

2.1.2 The western section the Site comprised parcels of marshy grassland, semi-improved acid grassland and improved grassland. There was also one parcel of plantation coniferous woodland and dense scrub. Fences were present in a few places, along with some scattered trees. However, the habitats were largely very open and expansive with no clear boundaries. In addition, a stream ran through a semi-improved acid grassland and marshy grassland. At Caerau, the Site is predominately built environment, consisting mainly of residential properties.

2.1.3 The eastern section of the Site was similar in nature, but had multiple semi-improved acid grassland and dense scrub parcels. There was also some bracken and dry dwarf shrub heath habitat present. Buildings and areas of hardstanding were also present to most western extent near Caerau and at the proposed site compound location.

2.1.4 Since 2024 there have been several ecological assessments carried out of the Site in support of the Project (see Section 1.4). Further details of how these assessments contribute to the Site's ecological baseline is provided below.

2.2 PRELIMINARY ECOLOGICAL APPRAISAL

2.2.1 In April and May 2024, CSA Environmental carried out a PEA of the Site (CSA Environmental, 2024[a]). The report identified that the OHL element of the Project crosses grassland, scrub and woodland habitat. This also included the Priority Habitat marshy grassland and Sites of Importance for Nature Conservation (SINCs) (Caerau West). Presence of reptiles and water voles were incidentally confirmed during the survey, with likely presence determined for bats, brown hare, harvest mouse, birds, reptiles, amphibians (including GCN) and terrestrial invertebrates. Further surveys for bats, GCN, and water vole were recommended.

2.2.2 Follow-on surveys for GCN found likely absence of this species[9]. A water vole survey was carried out for the associated Foel Trawsnant Grid Connection, this survey

[9] CSA Environmental (2024). Upper Ogmore Wind Farm, Maesteg – Great Crested Newt Report, November 2024. Report No. CSA/6891/02

confirmed the like presence of water voles in two water coursed to the south-western end of the Project[10],[11].

2.3 DESK STUDY

2.3.1 A desk study was carried out by CSA Environmental in May 2024 as part of the PEA. Its purpose was to identify designated sites, habitats of conservation importance and records of protected and / or notable species within search areas of various appropriate distances from the Site.

2.3.2 One Special Areas of Conservation (SACs) were identified within 10 km of the Site; Blackmill Woodlands SAC. Due to distance from the Site, the scale and nature of the Project and lack of functional habitat connectivity between the SAC and the Site, it is anticipated that there will be no impact on this SAC resulting from the Project.

2.3.3 One Site of Special Scientific Interest (SSSI) was identified within 3 km of the Site, this was the Mynydd-Ty-Isaf SSSI. Due to distance from the Site, the scale and nature of the Project and lack of functional habitat connectivity between the SSSI and the Site, it is anticipated that there will be no impact on the Mynydd-Ty-Isaf SSSI resulting from the Project.

2.3.4 Twenty-one non-statutory designated sites (Sites of Importance for Nature Conservation (SINCs) and Special Landscape Areas (SLAs) were identified within 3 km of the Site. Of these, the Caerau West SINC falls within the Site.

2.3.5 One hundred and seventeen Priority Habitats were identified within 1 km of the Site. Of which only marshy grassland falls within the Site. Only one Ancient Woodland Inventory (AWI) woodland was identified within 1 km of the Site and does not within the Site. The locations of designated sites and relevant habitats of conservation importance are shown in Figure 8H.4.

2.4 PHASE 1 HABITAT SURVEY

2.4.1 The site visit element of the PEA encompassed a UKHab survey by CSA Environmental in April and May 2024.

2.4.2 In response to consultation responses received from PEDW and NRW (**see Section 8.4 of the EIA Report**), the habitat types have been re-assessed by WSP and converted to Phase 1 habitat classifications in line

[10] CSA Environmental (2024). Foel Trawsnant Wind Farm – Water Vole Survey Report, November 2024. Report No: CSA/7086/04.

[11] The water vole survey was undertaken by CSA Environmental in support of two different development proposals (Upper Ogmore Grid Connection and Foel Trawsnant Grid Connection). Whilst the report title references Foel Trawsnant only, the development boundaries overlap and the water vole survey area encompasses all areas of suitable water vole habitat identified within the Upper Ogmore Site, isolated to the south-western end of the Project. This report and survey data is therefore considered relevant for this Proposed Development.

with JNCC descriptions[12]. A total of 12 Phase 1 habitats are present within the Survey Area, and their conservation value is also detailed within Table 2-1.

[12] Joint Nature Conservation Committee (JNCC) (2016). Handbook for Phase 1 habitat survey – a technique for environmental audit. JNCC, Peterborough.

Table 2-1 - Habitat types within the Survey Area and their nature conservation value

UKHab code	UKHab description	Phase 1 code	Phase 1 description	Nature conservation value
f2b	Purple moor grass and rush pasture	B5	Marsh / marshy grassland	This habitat has **County importance** and is listed as a Priority Habitat
g1b	Upland acid grassland	B12	Semi-improved acid grassland	This habitat has **Local importance**
g1b, 14, 102	Upland rush pasture	B12	Semi-improved acid grassland	This habitat has **Local importance**
g1c	Bracken	C1	Bracken	This habitat has **Site importance**
g4	Modified grassland	G4	Improved grassland	This habitat has **Site importance**
h1	Heathland	D1	Dry dwarf shrub heath	This habitat has **Site importance**
h3j	Willow scrub	A21	Dense / continuous scrub	This habitat has **Site importance**
h3d	Bramble scrub	A21	Dense / continuous scrub	This habitat has **Site importance**
h3e	Gorse scrub	A21	Dense / continuous scrub	This habitat has **Site importance**
h3h	Mixed scrub	A21	Dense / continuous scrub	This habitat has **Site importance**
r2	Rivers and streams	G2	Running open water	This habitat has **County importance**
s	Sparsely vegetated land	I14	No description of habitat is included within the PEA report. However, most likely to be I14 - Other natural rock exposure.	This habitat has **Site importance**
u1b	Developed land; sealed surface	-	No description of habitat is included within the PEA report. However, most likely to be hardstanding.	This habitat has **Negligible importance**
u1b5	Buildings	J36	Buildings	This habitat has **Site importance**
w1g	Other broadleaved woodland	A21	Dense / continuous scrub scrub[41]	This habitat has **Site importance**
w2	Plantation coniferous woodland	A122	Plantation coniferous woodland	This habitat has **Site importance**
N/A	Artificial unvegetated, unsealed surface	J1	Cultivated/disturbed ground	This habitat has **Site importance**

2.4.3 One habitat parcel across the Site was identified as a Priority Habitats in accordance with Section 7 of the Environment (Wales) Act 2016., this was purple moor-grass and rush pasture (see Figure 8H.3). Under Section 7 of this legislation all public bodies (including local planning authorities) must 'take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section and encourage others to take such steps.'

2.5 PROTECTED AND NOTABLE SPECIES

2.5.1 The potential for the Site to support legally protected and / or notable species was assessed using the results of the desk study and observations made during the field survey of habitats within and immediately surrounding the Site. The assessment of habitat suitability for protected and / or notable species was based on professional experience and judgement. This was supplemented by standard sources of guidance on habitat suitability assessment for key faunal groups including: bats (Collins, 2023 and Mitchell-Jones, 2004); badger (Harris *et al.*, 1991 and Roper, 2010); otter (Chanin, 2003); water vole (Dean *et al.*, 2016); dormouse (English Nature, 2006); birds (Gilbert *et al.*, 1998 and Bibby *et al.*, 2000); reptiles and amphibians (Froglife, 1999, Gent and Gibson, 2003 and English Nature, 2001); and invertebrates (Drake *et al.*, 2007 and Kirby, P., 2001).

2.5.2 Following the habitat survey and an evaluation of desk study records, and protected species surveys completed, the Site was considered suitable for supporting the following protected and / or notable species:

- Bats (all UK species);
- Water vole[13];
- Brown hare *Lepus europaeus*;
- Harvest mouse *Micromys minutus*;
- Birds;
- Reptiles (common lizard *Zootoca vivipara*[14], adder *Vipera berus*, grass snake *Natrix Helvetica* and slow worm *Anguis fragilis*);
- Amphibians (smooth newt *Lissotriton vulgaris*, palmate newt *Lissotriton helveticus*, common toad *Bufo bufo* and common frog *Rana temporaria*); and
- Terrestrial invertebrates, including red-necked footman *Atolmis rubricollis* (nationally scarce), and green hairstreak *Callophyrys rubi* (locally important).

2.5.3 Targeted species surveys were undertaken for bats, water vole, GCN and birds and the results of these are summarised below.

2.5.4 As detailed within the EIA Scoping Report for the Project[15], the following species are considered to be likely absent from the Site, or only present in low numbers and on an

[13] A water vole latrine was identified within the upland acid grassland in the south-western end of the Site during the UKHab survey.
[14] A common lizard was sighted at the south-western end of the Site within purple moor grass and rush pasture habitat during the UKHab survey.
[15] WSP (2025). Upper Ogmore Grid Connection – EIA Scoping Report.

occasional basis: badger *Meles meles*; otter *Lutra lutra*; dormouse *Muscardinus avellanarius*; hedgehog *Erinaceus europaeus* and GCN.

BATS

2.5.5 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. Of the 22 trees that were inspected;

- four (T3, T5, T14 and T16) were classified as 'PRF-M' (a tree with Potential Roosting Features (PRF) suitable for supporting multiple bat roosts);
- nine (T1, T6, T8, T9, T10, T11, T18, T21 and T22) were classified as 'PRF-I' (a tree with PRFs suitable for supporting individual bats); and
- nine trees were as having negligible suitability for supporting roosting bats.

2.5.6 No evidence of roosting bats or signs of use have been found to date at the time of writing of this Report (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.

2.5.7 Two of the trees (T5 (PRF-M) and T18 (PRF-I)) are located within 10 m of the Project.

2.5.8 Whilst effort has been made to avoid the removal of trees along the Site, some trimming / lopping work is anticipated to trees within 4 m of the OHL to maintain required safety clearances. A precautionary distance of 10 m however has been applied within this Report, until the design is finalised. Trees T5 and T18 are therefore considered to be 'at risk' of being impacted. The final pole locations will also be allowed to be micro-sited within 10 m on Site during construction to further minimise impacts where possible.

2.5.9 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.

2.5.10 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.

WATER VOLE

2.5.11 No records of water vole were identified within the search area, although a search of online databases suggests presence within the 10 km grid square that includes the Survey Area.

2.5.12 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 marshy grassland. Evidence of use by water vole (a latrine site) was also incidentally identified within this area of grassland during the UKHab survey.

2.5.13 Targeted surveys for water vole were carried out in June and September 2024[16], which focussed on the areas of suitable habitat (referenced as Watercourse A, A.1 and A.2 within the survey report) and surrounding habitat at the south-western end of the Site. 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.

2.5.14 **BIRDS**

2.5.15 Surveys undertaken in the 2025 breeding bird season has included: Vantage Point (VP) or flight activity surveys, Moorland Bird Surveys (MBS), Breeding Schedule 1 Raptor Surveys and Nightjar Caprimulgus europaeus surveys. A summary of the results of these is provided below.

VP Survey

2.5.16 Two target species were recorded during the VP surveys in 2025: red kite *Milvus milvus* and kestrel *Falco tinnunculus*.

2.5.17 The following secondary species were recorded during the VP surveys:

- Six species are listed on Section 7 of the Environment (Wales) Act (2016): common cuckoo Cuculus canorus, common linnet Linaria cannabina, common starling Sturnus vulgaris, skylark Alauda arvensis, herring gull Larus argentatus, and song thrush Turdus philomelos.
- Eight species are listed on the BoCC Wales 4 Red list: common cuckoo, common linnet, starling, swift Apus apus, herring gull, lesser black-backed gull Larus fuscus, meadow pipit Anthus pratensis, and willow warbler Phylloscopus trochilus; and
- Six species are listed on the BoCC 5 UK Red list: common cuckoo, common linnet, swift, herring gull, house sparrow Passer domesticus, and mistle thrush Turdus viscivorus.

Moorland Bird Survey (MBS)

2.5.18 No target species were recorded and confirmed or assumed to be breeding within the Study Area during the MBS.

2.5.19 The following protected or notable species were recorded during the MBS:

- Nine species are listed on Section 7 of the Environment (Wales) Act (2016): common cuckoo, common linnet, common starling, skylark, herring gull, house sparrow, reed bunting *Emberiza schoeniclus*, tree pipit *Anthus trivialis* and song thrush.
- Nine species are listed on the BoCC Wales 417 Red list: common cuckoo, common linnet, common starling, swift, herring gull, lesser black-backed gull, meadow pipit, tree pipit and willow warbler; and

[16] CSA Environmental (2024). Foel Trawsnant Wind Farm – Water Vole Survey Report, November 2024. Report No: CSA/7086/04.

- Eight species are listed on the BoCC 5 UK16 Red list: common linnet, common starling, swift, skylark, herring gull, house sparrow, tree pipit, and mistle thrush.

Breeding Schedule 1 Raptor Surveys

2.5.20 The following target species were recorded and confirmed or assumed to be breeding within the Study Area through the breeding raptor surveys:

- One species listed on Schedule 1 of the Wildlife & Countryside Act (1981 were recorded as breeding or holding territory: peregrine;
- Other breeding non-Schedule 1 raptor species: kestrel.
- One pair of peregrine were identified breeding within the Study Area, approximately 370 m from the Project.
- One pair of kestrels were identified breeding within the Study Area, approximately 1.3km south-southeast of the easternmost extent of the Project.
- Red kite was observed regularly throughout the breeding periods during breeding raptor and VP surveys, though none of the observations were indicative of breeding or holding a territory. It is assumed that red kite occurs as a non-breeding resident.

Nightjar Survey

2.5.21 Two nightjar males were recorded churring in the Study area during the nightjar surveys. Nightjar are listed on Section 7 of the Environment (Wales) Act (2016).

3 HABITAT LOSS AND GAINS

3.1.1 Minimal vegetation clearance is proposed to enable the construction of the Project. This will be achieved through 'micro-siting' or precise placement of OHL poles. Furthermore, where required, clearance of habitat will be temporary wherever possible. No tree removal is required to facilitate the UGC works. The removal of two trees is anticipated under the current Project design to facilitate the OHL in the at risk area.

3.1.2 There will, however, be small scale impacts on SINCs and Priority Habitats from permanent and temporary habitat removal. This is in addition to the small scale, but permanent removal of two trees mentioned above.

3.1.3 Indicative areas of permanent and temporary habitat loss of SINC habitat are shown in Table 3-1 and areas of indicative temporary and permanent habitat loss of Priority Habitat are shown in Table 3-2. Much of the SINC habitat overlaps with areas of Priority habitat or habitats of conservation importance (as shown in Figure 8H.4) and should not be added together to calculate a total loss.

Table 3-1 – Indicative Permanent and Temporary Land Take Areas of SINC habitat

Feature	Indicative Permanent Land Take Areas (m2)	Indicative Temporary Land Take Areas (m2)
Caerau West	24	100.8
Total	**24**	**100.8**

Table 3-2 – Indicative Permanent and Temporary Land Take Areas of Priority Habitat or habitats of conservation importance

Feature	Indicative Permanent Land Take Areas (m2)	Indicative Temporary Land Take Areas (m2)
Purple moor-grass and rush	12	50.4
Tree Removal	20	N/A
Total	**32**	**50.4**

3.1.4 Permanent habitat loss will entail the vegetation clearance required within the footprint of the OHL poles. Temporary habitat loss will entail vegetation clearance withing a buffer around each OHL pole. Two trees is anticipated to also require removal to facilitate the OHL works with most of the permanent and temporary habitat loss impacting grassland habitats. The Project is anticipated to also impact some areas of scrub. The small scale of the loss of these habitats is considered of low significance in comparison to the availability of this habitat in the wider Site. All temporarily removed grassland habitats will be translocated by turf layer translocation during the construction phase. This will follow appropriate methodology to avoid soil compaction. Turfs will be stored securely and will be reinstated as soon as is feasible, with appropriate aftercare (e.g. watering during dry weather).

3.1.5 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 Site and no habitat loss is anticipated. The Project also includes an allowance for helicopter delivery of goods within the more upland areas of the Site (if considered beneficial).

3.1.6 In addition to turf translocation, consideration will be given to habitat creation and enhancement within habitats of low ecological value will be carried out within the Site. Habitat creation and enhancement measures will be designed and agreed in consultation with the local planning authorities (BCBC and NPTCBC), with this report updated to include full details prior to full DNS submission.

3.1.7 Such measures may however include enhancing retained parcels of improved grassland into species-rich acid and neutral grassland parcels through the inclusion of species-rich seed mixes and incorporation of plugs / seeds to create new areas of marshy grassland where appropriate. Enhanced habitats will be subject to long-term management to maintain botanical diversity.

3.1.8 Mitigation and compensation will be provided for the permanent habitat loss through replacement of lost trees at a 3:1 ratio. This will be achieved through the creation of new hedgerows and tree lines throughout the Site, as well as strengthening of existing tree lines.

3.1.9 Any adverse impacts on trees with bat roosting suitability will be avoided where possible. However, it has been determined that the Project has potential to affect trees with potential to support roosting bats (T5 and T18)[17]. These trees may be removed in their entirety, or may be subject to removal of branches which, unless mitigation measures are in place, has potential to result in the loss, damage or disturbance of a bat roosting feature.

3.1.10 Whilst no bats were recorded within any of the tree surveys, bats are known to have a highly mobile and opportunistic nature and may start using a roosting site, or potential roosting site, after it has been surveyed or may have been roosting somewhere else during the period it was surveyed. For this reason, bats may potentially be present but remain undetected at the time of survey. ‘Micro-siting’ will be utilised to avoid trees with bat roosting suitability where possible, however, where they cannot be avoided, the trees should be fully inspected by an appropriately licenced bat ecologist immediately prior to works to ensure no bats are present.

[17] [17] WSP (2025). Upper Ogmore Grid Connection – Bat Aerial Tree Climbing Survey Report (October 2025).

3.1.11 In the event that bats are found to be present during the pre-works survey, works would be postponed, and advice sought from NRW. It may be necessary to apply for a European Protected Species Licence (EPSL) from NRW to allow the lawful removal of the tree / limb.

3.1.12 Additional mitigation measures are recommended which are also intended for incorporation into the wider Site – see Section 4. These measures include mitigation for specific protected / notable species e.g., bats, water voles and birds.

3.1.13 Habitat retention is considered the most desirable option for biodiversity. It is recommended that where there is the opportunity, habitats will be retained as far as practicable for the Project. In particular, retention of connective habitats should be prioritised owing to their importance in maintaining wildlife corridors / commuting routes, a key point for ecosystem resilience. This avoidance of vegetation clearance strategy has already been worked into the Project design.

3.1.14 It is anticipated that habitat replacement (i.e., 3:1 replacement of permanently lost trees), turf translocation and grassland enhancement can likely be achieved within the footprint of the Project design. This is owing to the small areas of proposed habitat clearance required to enable the Project.

3.1.15 Work exclusion buffer zones around ecologically sensitive features have been identified to include a 5m work exclusion area on watercourses suitable to support water vole; and

3.1.16 Additional measures for species which were identified in the ecological surveys as potentially present within the Site are discussed further in Section 4.

3.1.17 These recommended measures will enable NBB to be achieved in combination with the additional avoidance, minimisation, mitigation and compensation measures detailed in Section 4.

4 STEPWISE APPROACH TO MITIGATION

4.1.1 This section outlines the ‘stepwise approach’ that has been followed to avoid, minimise, mitigate and compensate impacts resulting from the Project.

4.1.2 An experienced ecologist has been involved with the Project from the outset, advising on survey requirements and measures to avoid, minimise, mitigate and / or compensate impacts to species and habitats. This stepwise approach taken to deliver a NBB is described in detail in Table 4-1.

4.1.3 Biodiversity and wider ecosystem benefits were considered early in the design process for the Project. This led to design changes, including the retention of habitats (through ‘micro-siting’ of OHL masts) and avoidance of disturbance to protected species where possible (i.e., use of suitable work exclusion buffers surrounding sensitive ecological features, or avoidance of tree removal in the first instance). This accords with the ‘Avoidance’ principle of the stepwise approach.

4.1.4 Where it was not possible to avoid specific biodiversity impacts, measures to minimise the impacts were recommended. This led to the recommendation of several strategies and method statements which will aim to minimise the Project’s impact on biodiversity. This accords with the ‘Minimise’ principle of the stepwise approach.

4.1.5 Where predicted impacts may still occur following avoidance measures and measures to minimise impacts, mitigation measures will be implemented. Mitigation and enhancement measures have been designed to reduce the impacts of the Project, supporting the ‘Mitigate’ principle of the stepwise approach.

4.1.6 Additional compensation measures were considered as a last resort when biodiversity impacts could not be fully mitigated. This accords with the ‘Compensate’ principle of the stepwise approach.

4.1.7 The stepwise approach applied for ecological receptors through the development of proposals is summarised in Table 4-1. By following this approach, the Project will have the opportunity to fulfil its intention in creating the proposed grid connection, whilst also providing an enhanced area for biodiversity. The measures discussed will lead to an overall NBB and improve ecosystem resilience.

Table 4-1 – Stepwise approach taken to deliver NBB

Avoidance	Minimise	Mitigate	Compensate
Avoidance of habitat removal through 'micro-siting' mast locations. Working to avoid all habitat loss in the first instance wherever possible and then 'micro-siting' to avoiding Priority habitats, focusing mast locations into open areas of agricultural grassland areas.	Produce and adhere to a Construction Environmental Management Plan (CEMP). This will provide good construction site management practices to minimise effects on air quality, noise and vibration, traffic and water quality. It will also ensure that environmental best practice is followed so that habitats and species are safeguarded during construction and are appropriately managed during operation. A suitable lighting strategy will be outlined within the CEMP. Although no night-time working is anticipated, shorter daylight hours during the winter months may lead to the ad hoc requirement for artificial lighting during these periods. Directional lighting will be utilised to prevent light spill onto sensitive habitats.	Temporarily removed habitat will be translocated or replaced as soon as possible following an appropriate method statement.	Incorporate species-rich grassland mixes of local provenance, inclusive of native wildflowers / plugs where appropriate throughout the Site. These can be utilised to enhance retained grasslands of low biodiversity value, i.e., improved grassland. Good horticultural practice should be utilised, including the use of peat-free composts, mulches and soil conditioners.
Avoidance of long-term habitat fragmentation, e.g., design of working methods to result in the majority of habitat removal being temporary. Maintaining connectivity of habitats protecting wildlife corridors and maintaining ecosystem resilience.	Adherence to a PMoW. This will include a pre-works check and supervision by an Ecological Clerk of Works (ECoW) to check and confirm that Site conditions have not changed and that no additional ecological receptors require consideration before works begin.	Implement a sensitive mowing strategy to maximise species-richness of grassland habitats and to encourage pollinating invertebrates. A single annual cut (removing cuttings) will maintain grassland	Creation and enhancement of existing connective habitats i.e. grasslands through incorporation of native species of local provenance which provide food sources such as fruit, nuts and nectar. Such species may include hawthorn *Crataegus monogyna*, blackthorn *Prunus spinosa*, honeysuckle *Lonicera*

Avoidance	Minimise	Mitigate	Compensate
	Pre-works checks are relevant to bats, water vole, brown hare, harvest mouse, breeding birds common reptiles and amphibians, and INNS. This will include pre-works inspections of T5 and T18 to confirm absence of roosting bats. Full details will be provided within PMoW documentation.	areas with a taller sward height and increased botanical diversity.	*periclymenum* and hazel *Corylus avellana*. This will encourage native invertebrates, including pollinators and night-flying species (enhancing bats foraging opportunities). Compensatory trees (replaced at 3:1) will be planted. Species could include hazel, sessile oak *Quercus petraea*, and willow *Salix spp.*
Retain and protect all trees within the Site which have been assessed as having suitability for roosting bats, where possible. Any tree felling or limb removal should avoid those trees identified to have PRFs in the first instance.	Present a Toolbox Talk (TBT) to contractors at the start of works to describe the biodiversity issues associated with the Site and the measures to be taken on Site to avoid/minimise impacts on these receptors.	Install brash and log piles as artificial hibernacula. Piles of vegetation will provide suitable egg-laying sites for reptiles. These will also provide refuge / hibernation opportunities for species such as hedgehog, reptiles and amphibians. Brash and log piles can comprise felled vegetation resulting from the Project.	Install bat and bird boxes on trees within the Site to provide additional refuge for bat and bird species. Bat boxes should be provided at a 2:1 ratio to those roosting opportunities lost or damaged. Lost PRFs can also be compensated for through manual creation of PRFs in retained trees.
Avoidance of habitat removal during ecologically sensitive periods. Avoid carrying out vegetation clearance within the breeding bird season where possible (considered as between March – August inclusive). Precautionary restrictions for working in locations where	Consider storage of construction materials and cut vegetation. Materials that could be used by sheltering animals will not be stored adjacent to potentially suitable habitat, to ensure mammals, reptiles and amphibians do not move onto the construction site.	Incorporation of features into the Project design to mitigate against bird collision risk with the proposed OHL. E.g., micro-siting OHL route to avoid known bird commuting routes, use of bird flight diverters on the OHL to improve visibility for birds and reduce collision events and habitat management under OHL	Consideration of long term management of habitats on Site, including use of fencing to exclude livestock to reduce the impact of grazing and would provide additional cover and resting opportunities for species.

Avoidance	Minimise	Mitigate	Compensate
Schedule 1 of the WCA bird nests may be present (e.g. restrictions to movement of vehicles within access roads in woodlands to the south, where there is potential for nests, should a breeding raptor nest be recorded ahead of works). Avoid removal / dismantling of potential refugia / hibernacula during the reptile hibernation season. The reptile hibernation season is considered as between October to March inclusive. The Project is also anticipated to avoid night-time working.		route to discourage sensitive species.	

5 NET BENEFIT FOR BIODIVERSITY

5.1.1 NBB in Wales is a qualitative approach that emphasises the consideration of biodiversity and wider ecosystem benefits early in the design process, hence utilising the ‘stepwise approach’. The onus is placed on not only delivering an overall improvement in biodiversity but also promoting ecosystem resilience.

5.1.2 Although the Welsh assessment does not utilise a metric, demonstrating an overall net benefit is often quantifiable. The Welsh approach aims to demonstrate an increase in ecosystem resilience; this is difficult to quantify as ecosystems are complex and dynamic. This is where the Welsh Government and NRW have developed the DECCA framework, which is utilised for a better understanding of aspects of ecosystem resilience.

5.1.3 The construction of the Project will result small-scale and mostly temporary habitat loss to make way the installation of OHL masts. This is proposed to be achieved through ‘micro-siting’ or precise placement of OHL poles. Furthermore, where required, clearance of habitat will be temporary wherever possible. Permanent removal of habitat is however required for the installation of OHL masts and the permanent removal of two trees is anticipated within the at risk area.

5.1.4 Habitat compensation at the relevant ratio (as described in Section 3) will ensure that habitats are replaced appropriately and according to their importance for biodiversity and ecosystem resilience. This may be achieved by direct replacement of the same habitat type or by replacement with a higher ecological value habitat. It is understood that these ratios can be achieved within the footprint of the Project design. This is owing to the small areas of proposed habitat clearance required to enable the Project. Habitat replacement and all other mitigation is anticipated to be carried out on-Site. Buffers on sensitive ecological features have been set out to avoid impacting protected species and habitats.

5.1.5 The Project demonstrates a proactive consideration for biodiversity and the wider ecosystem throughout the design process. Where impacts to biodiversity were predicted, following the application of avoidance measures and measures to minimise impacts, mitigation was implemented, and compensation provided. The measures aim to increase ecosystem resilience could be categorised into six types of mitigation / compensation and are summarised in Table 5-1. Each measure’s contribution to ecosystem resilience is also discussed using the DECCA Framework.

Table 5-1– Mitigation and compensation measures and their contribution to ecosystem resilience

Mitigation/compensation measure	Contribution to the DECCA Framework				
	Diversity	Extent	Condition	Connectivity	Adaptability to change
Strengthening of existing habitats e.g., utilisation of species-rich grassland mixes / plugs of local provenance, implementing a sensitive mowing strategy to maximise species-richness of grassland habitats, to encourage native invertebrates including pollinators, strengthening tree lines and scrub margins through incorporating native species and creating new scrub margins and removal of undesirable plant species (including INNS) across the Site.	These measures will increase diversity by providing a higher number of ecological niche opportunities within the Site.	These measures will increase the extent of habitats which are of high biodiversity value within the Site.	These measures will improve the condition of the Site by establishing higher quality habitats, implementing a sensitive mowing strategy, removing undesirable plant species and replacing these with native species of local provenance.	Measures such as strengthening tree lines and other boundary habitats will improve connectivity and enhance corridors for wildlife. Enhanced biodiversity of grasslands will contribute to invertebrate corridors. Creating new scrub margins along boundary features will create refuge opportunities for species such as reptiles, thereby improving commutability of the Site for such species. Improved connectivity will improve population connectivity and dispersal for a range of protected and / or notable species, as well as ensuring continued access to potential foraging /	The improved ecological diversity, condition and connectivity of the habitats within the Site created by these measures will improve its resilience to climate change, pollution and other external factors.

Mitigation/compensation measure	Contribution to the DECCA Framework				
	Diversity	Extent	Condition	Connectivity	Adaptability to change
				nesting habitats within and around the Site.	
Turf translocation of temporarily removed habitats, e.g., grassland habitats.	Botanical diversity of turf will be maintained during translocation.	Extent of habitat will remain unchanged as a result of turf translocation.	Condition of habitat will remain unchanged as a result of turf translocation and future monitoring (where remedial actions will be proposed, if required – Section 6).	Connectivity of habitats will be unaffected by turf translocation.	Maintaining the botanical diversity, extent and condition of turf will help to maintain the Site's resilience to climate change, pollution and other external factors.
Creation of new habitat to exceed the agreed ratio to habitats lost, e.g., compensatory tree and hedgerow planting (3:1 ratio).	These measures have the potential to increase tree diversity by providing a higher number of ecological niche opportunities within the Site.	These measures will increase the extent of trees within the Site.	-	Planting new trees has the potential to improve connectivity between existing habitats within the Site.	The potential for improved ecological diversity, extent, and connectivity by planting compensatory trees within the Site will improve its resilience to climate change, pollution and other external factors.
Creation of opportunities for wildlife using artificial measures e.g., providing artificial hibernacula and piles of	These measures will increase diversity by	Certain species will benefit from increased	-	Measures such as fencing off areas will provide undisturbed	The improved ecological diversity, extent and

Mitigation/compensation measure	Contribution to the DECCA Framework				
	Diversity	Extent	Condition	Connectivity	Adaptability to change
vegetation for egg-laying reptiles, installing bat and bird boxes and invertebrate hotels and fencing off areas to create undisturbed areas for nature	providing a higher number of ecological niche opportunities within the Site.	roosting opportunities within the Site such as bats and birds.		wildlife corridors for species	connectivity of the Site created by these measures will improve its resilience to climate change, pollution and other external factors.
Avoidance of ecologically sensitive features, e.g. through the use of work exclusion buffer zones or avoidance of tree removal.	Ecological diversity will be maintained by protecting ecologically sensitive features.	Extent of ecologically sensitive features will remain unchanged through establishing work exclusion buffer zones.	Condition of ecologically sensitive features will remain unchanged through establishing work exclusion buffer zones.	Connectivity of ecologically sensitive features will remain unchanged through establishing work exclusion buffer zones.	Maintaining the diversity, extent, condition and connectivity of ecologically sensitive features will help to maintain the Site's resilience to climate change, pollution and other external factors.
Implementing measures which mitigate against bird collision risk with the proposed OHL e.g., micro-siting OHL route to avoid known bird commuting routes, use of bird flight diverters on the OHL to improve visibility for birds and reduce collision events and habitat management under OHL route to discourage sensitive species.	These measures will maintain diversity by preventing bird mortality through collision with OHL.	-	-	These measures will maintain connectivity by avoiding important bird commuting routes.	These measures will work to maintain ornithological diversity through reducing mortalities. They will also support in maintaining existing important commuting routes which transect the Site. Thereby

Mitigation/compensation measure	Contribution to the DECCA Framework				
	Diversity	Extent	Condition	Connectivity	Adaptability to change
					maintaining bird populations' resilience to climate change, pollution and other external factors.

6 FUTURE MANAGEMENT AND MONITORING

6.1.1 To ensure the Project delivers NBB and ecosystem resilience, it will be necessary to undertake future management and monitoring. This should be undertaken during each phase of the development i.e., construction and operation.

6.1.2 A Conservation Plan will be produced for the Project. Details within the Conservation Plan will be finalised following discussion and agreement with the Local Planning Authority (LPA). This will detail management and maintenance measures for the habitats created and long-term monitoring of relevant species. These measures will be inclusive of:

- a management and monitoring plan for maintaining the newly enhanced, species-rich grassland parcels.
- specific management plans such be in place for each habitat type proposed for turf translocation;
- a management and monitoring plan for maintaining SINC habitat.
- connective habitat maintenance, e.g., future management of enhanced tree lines.
- a low intensity, cutting regime along retained and created interface scrub habitats, allowing long grass to provide cover for reptile species during summer months.
- long term maintenance of compensatory measures for protected and notable species, e.g., maintenance of bat and bird boxes / artificially created features and hibernacula.
- post-construction monitoring.

6.1.3 The Conservation Plan should identify the vision and objective for the Site and any relevant mitigation areas. It should include a clear timetable and management commitments and remedial actions over a 5-year period.

6.1.4 It is proposed that habitat management will be carried out at years 1, 3 and 5 of the 5-year period. The monitoring of establishing habitats should include a condition assessment, including the presence of negative and positive indicator species, and any remedial actions (e.g. removal of INNS or undesirable species).

6.1.5 Post-construction monitoring will determine the efficacy of mitigation measures and help to identify mitigation improvements or changes where necessary. Regular reviews of the Conservation Plan, in collaboration with NRW and the LPA, will be required to assess its success and to make alterations where necessary.

6.1.6 The implementation of the above measures will help to ensure the delivery of NBB and ecosystem resilience in the long-term.

7 CONCLUSION

7.1.1 In conclusion, the Project demonstrates a proactive consideration for biodiversity and the wider ecosystem throughout the design process. Where impacts to biodiversity were predicted, following the application of avoidance measures and measures to minimise impacts, mitigation was implemented, and compensation provided. The measures aiming to increase ecosystem resilience could be categorised into six types of types of mitigation / compensation comprising; strengthening of existing habitats; turf translocations of temporarily removed habitats; creation of new habitats to exceed the agreed ratio to habitats lost; creation of opportunities for wildlife using artificial measures; avoidance of ecologically sensitive features; and implementing measures which mitigate against bird collision risk with the proposed OHL.

7.1.2 By following the approach, as laid out within this report, the Project will have the opportunity to fulfil its intention in creating the proposed grid connection, whilst also providing an enhanced area for biodiversity. The measures discussed will lead to an overall NBB and improve ecosystem resilience.

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Appendix A

RELEVANT LEGISLATION AND PLANNING POLICY

Table A-1 – Descriptions of relevant legislation and planning policy

Legislation/policy	Overview
The Environment (Wales) Act 2016	The Environment (Wales) Act 2016 replaced the existing biodiversity duty (in the Natural Environment and Rural Communities Act 2006) which required public authorities to have a regard to conserving biodiversity. The new Section 6 duty takes this further, requiring all public authorities, when carrying out their functions in Wales, to seek to "maintain and enhance biodiversity" where it is within the proper exercise of their functions. In doing so, public authorities must also seek to "promote the resilience of ecosystems". This was introduced to plan and manage Wales' natural resources in a sustainable and joined-up way and is intended to work alongside the Wellbeing of Future Generations Act 2015.
The Wellbeing of Future Generations Act 2015	The Wellbeing of Future Generations Act 2015 requires national government, local government, local health boards and other specified public bodies to carry out sustainable development and work towards objectives that contribute to seven wellbeing goals. Sustainable development in the Act means "the process of improving the economic, social, environmental and cultural wellbeing of Wales by taking action, in accordance with the sustainable development principle (i.e. not compromising the ability of future generations to meet their needs), aimed at achieving the well-being goals".
Nature Recovery Action Plan Wales (NRAP) – the Biodiversity Strategy for Wales. Part 1: Our Strategy for Nature (2015) and Part 2: Nature Recovery Action Plan (2020 – 2021)	The NRAP complements The Well-being of Future Generations (Wales) Act 2015 and the Environment Act (Wales) 2016. The Plan sets out how the United Nations Environment Programme's Convention on Biological Diversity's (CBD) Strategic Plan for Biodiversity (and the associated Aichi Biodiversity Targets for 2011-20 in Wales) is addressed in Wales. The ambition of the plan is 'To reverse the decline in biodiversity, for its intrinsic value, and to ensure lasting benefits to society'. The NRAP is split into three parts. Part 1: Our Strategy for Nature, sets out the commitment to reversing the loss of biodiversity in Wales, and the objectives for action, these objectives are listed below: ▪ Engage and support participation and understanding to embed biodiversity throughout decision making at all levels. ▪ Safeguard species and habitats of principal importance and improve their management. ▪ Increase the resilience of our natural environment by restoring degraded habitats and habitat creation. ▪ Tackle key pressures on species and habitats. ▪ Improve our evidence, understanding and monitoring. ▪ Put in place a framework of governance and support for delivery. Part 2: Our Action Plan set out those actions which had been specifically identified to meet our objectives to reverse the decline of biodiversity. Part 3: The Nature Recovery Framework sets out the governance and partnerships involved in nature recovery in Wales, and the relationships between them.
Planning Policy Wales, 2024	NBB in association with development is encouraged by PPW (2024).

	It states 'By protecting, maintaining and enhancing biodiversity, increasing the resilience of ecosystems and our natural environment more generally, it will be possible to future proof economic assets in response to the challenges presented by the climate emergency, to promote low carbon and appropriate resource choices which address the causes of climate change and to provide cost effective ecosystems services such as clean air and water.'
Future Wales – The National Plan 2040	Future Wales – the National Plan 2040 is a national development framework, setting the direction for development in Wales to 2040. It is a development plan with 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 our communities. The plan contains Policy 9 – Resilient Ecological Networks and Green Infrastructure, a high bar strategic planning system. Policy 9 seeks "To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure". The Welsh Government now requires strategic action to safeguard ecological networks and secure biodiversity enhancement.
Welsh Government's Chief Planner Letter on Biodiversity Enhancements	In 2019, the Welsh Government's Chief Planner issued a letter to the Heads of Planning to set out how biodiversity enhancements should be secured as part of a development proposal. The letter stated that development applications which do not propose biodiversity enhancements will be refused unless they include other significant material considerations. The letter reiterated the importance of incorporating biodiversity enhancements into development proposals at the earliest possibility and into local development policies. It also stated that a net benefit for biodiversity should be proportional to the extent and impact of a development and should contribute to a bigger, better, more joined up approach to a resilient and biodiverse ecological network in Wales.
Swansea Council Adopted Local Development Plan (LDP) (2010-2025), with particular reference to: ▪ ER 6 Designated Sites of Ecological Importance; ▪ ER 8 Habitats and Species; and ▪ ER 9 Ecological Networks and Features of Importance for Biodiversity.	The Swansea LDP states the following in relation to Biodiversity: **ER 6:** *'Development will not be permitted that would result in a likely significant adverse effect on the integrity of sites of international or national nature conservation importance, except in the circumstances specified in relevant legislation.'* **ER 8:** *'Development proposals that would have a significant adverse effect on the resilience of protected habitats and species will only be permitted'*…in specified circumstances as listed within the LDP. **ER 9:** Development proposals will be expected to maintain, protect and enhance ecological networks and features of importance for biodiversity. Particular importance will be given to maintaining and enhancing the connectivity of ecological networks which enable the dispersal and functioning of protected and priority species.
Swansea Council Supplementary Planning Guidance (SPG): Biodiversity and Development (2021)	This document provides guidance based on the biodiversity chapters of the LDP to provide guidance and clarity on ensuring that development within Swansea maintains and enhances the County's biodiversity and delivers long term ecosystem resilience. It states that '*all proposals should follow the Stepwise Approach*' to ensure that biodiversity is considered at every stage of the development process. It

	also provides a '*framework to demonstrate that proposals have responded to a robust ecological understanding of a site, and that appropriate ecological mitigation, compensation, enhancement and aftercare will be provided*'.
Swansea Local Biodiversity Strategy and Action Plan (2005).	Promoting Swansea's natural environment (2005) is working '*to protect, manage, enhance and promote Swansea's outstanding natural environment and biodiversity*'

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