



Candwr Solar Farm

Pre Application Consultation

Environmental Statement

Appendix 6.9 Green Infrastructure Statement

2 July 2026



Appendix 6.9: Green Infrastructure Statement



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1 INTRODUCTION

1.1 Background

- 1.1.1 This Green infrastructure Statement (GIS) has been prepared for Candwr Solar Development of National Significance (DNS) in respect of the construction, operation and decommissioning of the Candwr Solar Farm (the Proposed Development).
- 1.1.2 The Proposed Development would comprise the installation and operation of ground mounted solar photovoltaic (PV) arrays with all associated works, equipment and necessary infrastructure.
- 1.1.3 The Site is located at land at Court Farm, Ponthir, Monmouthshire and has an area of approximately 131.62 hectares ("ha"), incorporating cable routes. The Site is comprised of agricultural land across thirteen land parcels which are spread across three Local Authority boundaries including Monmouthshire Council, Torfaen County Borough Council and Newport City Council.
- 1.1.4 The agricultural land parcels which form the Site comprise agricultural fields; grazed by cattle and sheep bordered by hawthorn dominated hedgerows and broadleaved woodland belts. Candwr Brook flows between the pockets of land located within the Site, before flowing into the Afon Lwyd.
- 1.1.5 Within the wider surrounding landscape, habitats include further agricultural fields and pockets of woodland.
- 1.1.6 The Site is located approximately 5.2km north-east of the City of Newport, approximately 1km east of the village of Ponthir and approximately 2.4km north of the town of Caerleon at the closest point (land parcel 12).
- 1.1.7 The Site is located adjacent to the Dŵr Cymru Welsh Water Court Farm Treatment Works within an area of open countryside characterised by undulating ridges and valleys. The development is proposed to be situated on relatively high ground utilising the south facing slopes of the valley landscape.

1.2 Purpose of this document

- 1.2.1 In Wales, a Green Infrastructure Statement (GIS) is required under Planning Policy Wales Edition 12 (PPW12) and Section 6 of the Environment (Wales) Act 2016, which mandates that developments demonstrate a net benefit to biodiversity and green infrastructure. The statement must be submitted as part of the planning application.
- 1.2.2 The purpose of the GIS, as set out by PPW12, is to demonstrate how the 'step-wise' approach (Section 6.4.15 of PPW12) has been applied to the Proposed Development.
- 1.2.3 PPW defines green Infrastructure as '*the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Green infrastructure can function at a range of different scales...*' (refer to **Section 2.1** of this GIS for a detailed definition).
- 1.2.4 The purpose of this document is to outline the wider context of natural and semi-natural features that exist in the surrounding context of the Site and how this has influenced the design of the Proposed Development, including any avoidance and minimisation of harm, mitigation, compensation and enhancement commitments.
- 1.2.5 PPW12 policy states that GISs should highlight the baseline data considered, surveys and assessments undertaken as part of the planning application. This GIS should therefore be read in conjunction with the Environmental Statement (ES) chapters and technical appendices of the ES, as well as the planning documents submitted to Planning and Environment Decisions Wales (PEDW) as part of the planning

application. **Table 1.1** provides the location of relevant supporting information which has informed this GIS.

Table 1.1: Document wayfinding

Document / relevant information	Location
Environmental Statement	
Main Written Statement	Chapter 3: Application Site
	Chapter 4: Proposed Development Alternatives
	Chapter 5: Landscape and Visual
	Chapter 6: Ecology
	Chapter 12: Air Quality
	Chapter 8: Agricultural Circumstances
Supporting Technical Appendices	Outline Construction Environmental Management Plan (oCEMP)
	Appendix 5.10: Arboricultural Impact Assessment
	Outline Landscape and Environmental Management Plan (oLEMP)
	Outline Soils Management Plan (oSMP)
	Appendix 9.1: Flood Consequence Assessment and Surface Water Drainage Strategy
	Appendix 6.1: Habitats and Vegetation Technical Appendix
	Figure 5.5: Indicative Landscape Strategy

1.3 Structure of this GIS

1.3.1 Acknowledging the content of PPW12 and reflecting the assessment undertaken for the Proposed Development, this GIS is structured as follows:

- Context;
- Policies and plans;
- The application of the step-wise approach to the Proposed Development; and
- Summary and conclusion.

2 CONTEXT TO GREEN INFRASTRUCTURE

2.1 What is green infrastructure?

2.1.1 In line with PPW12 and the Well-being of Future Generation (Wales) Act 20152, green infrastructure encourages a wider, sustainable and problem-solving outlook, focusing on integrating and addressing multiple issues. 2.1.2

2.1.2 Paragraph 6.2.1 of the PPW12 defines green infrastructure as:

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

- 2.1.3 Policy 9 (Resilient Ecological Networks and Green Infrastructure) of Future Wales: The National Plan 2040¹ ensures development proposals demonstrate action to maintain and enhance biodiversity (to provide a net benefit), improve ecosystem resilience, and support green infrastructure through innovative, nature-based planning and design approaches. Please refer to **Section 3.2** for more detail on Future Wales.

2.2 Declaration of a climate and nature emergency

- 2.2.1 The Welsh Government declared a climate emergency in 2019 and recognised that climate change threatens health, economy, infrastructure, and the natural environment. As part of their response to the threat to the natural environment, the need for nature recovery was recognised, specifically in the form of a Nature Recovery Action Plan to enhance ecosystem resilience and reverse habitat decline.
- 2.2.2 The Welsh Government has since declared a nature emergency on 30 June 2021. The Senedd, through the Climate Change, Environment, and Infrastructure Committee are undertaking work to identify Wales' response to the UN Biodiversity Conference (COP 15) held in December 2022 and how these will shape the Welsh Government's response to the nature emergency and related matters. As part of this work, the Committee is considering how Wales can implement the COP15.
- 2.2.3 Newport City Council passed a motion in November 2021; it declared a climate emergency and outlined the ambitions of the council to tackle climate change. One of which was to reduce emissions to net zero carbon by 2030.
- 2.2.4 In June 2019, Torfaen County Borough Council passed a motion to declare a climate emergency. The council released a Climate and Nature Emergency Action Plan 2022 – 2027² outlining a framework for achieving net carbon zero by 2030.
- 2.2.5 Monmouthshire County Council declared a climate emergency by unanimous decision in May 2019. Since then, the Council has published a climate emergency action plan³ and have set a commitment to reduce the Council's own emissions by 2030 and to encourage and support residents and businesses to take their own actions to reduce their carbon emissions.

2.3 Planning Policy Wales

- 2.3.1 PPW12 states that a GIS should be *'proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal'*. In addition, PPW12 envisages *'the GIS will be an effective way of demonstrating positive multi-functional outcomes*

¹ Welsh Government (2021). Future Wales. The National Plan 2040. Available at: gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf

² Torfaen County Borough Council (2022). Torfaen County Borough Council Climate and Nature Emergency Action Plan. Available at: [Climate and Nature Emergency Action Plan](#).

³ Monmouthshire County Council (2024). Monmouthshire County Council Climate and Nature Emergency Strategy. Available at: [Climate & Nature Emergency - Monmouthshire](#)

which are appropriate to the site in question and must be used for demonstrating how the step-wise approach has been applied' (Paragraph 6.2.12 of the PPW12).

2.3.2 PPW12 (Paragraph 6.2.13) notes that a GIS should highlight any baseline data considered, and surveys and assessments undertaken, including habitats and species surveys, arboricultural surveys and assessments, and landscape and ecological management plans.

2.3.3 PPW12 states that the quality of a development should be enhanced through integrating green infrastructure through appropriate site selection and use of creative design. Section 6.2.11 'Integrating Green Infrastructure and Development' states:

'With careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well-being outcomes'.

2.3.4 PPW12 (Paragraph 6.2.14) goes on to outline that the twelve 'Building with Nature' standards represent good practice and are an effective prompt for developers to improve the quality of their schemes and demonstrate the sustainable management of natural resources.

Diversity, Extent, Condition, Connectivity and Adaptability of ecosystem resilience (DECCA).

2.3.5 PPW12 (Paragraph 6.4.5) states that 'development should not cause any significant loss of habitats or populations of species (not including non-native invasive species), locally or nationally and must work alongside nature and it must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems. A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and long-term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site.'

Under Section 6 of the Environment (Wales) Act 2016 Natural Resources Wales ('NRW') and local authorities must seek to maintain and enhance biodiversity and the resilience of ecosystems. This means that they should ensure that development should not cause any significant loss of habitat or populations of species and a net benefit for biodiversity should be provided.

2.3.6 The step-wise approach provides the means in which to demonstrate the steps taken to provide a net benefit for biodiversity. In doing so, local authorities must take account of, and promote the resilience of, ecosystems, in particular the following five attributes referred to as the DECCA framework (Paragraph 6.4.5 of the PPW12) detailed in **Table 2.1**.

Table 2.1: The DECCA Framework (adapted from PPW12)

Attribute	Description
Diversity	More diverse ecosystems are more resilient to external influences (this includes biological, geological and physical diversity on a site). This means strategic planning and individual development proposals should avoid negative impacts on biodiversity by considering how biodiversity assets can be maintained and enhanced.
Extent	The size of an ecosystem will affect its capacity to adapt, recover or resist disturbance. Strategic planning and individual development proposals must avoid loss in the extent of biodiversity and incorporate measures to appropriately maintain and enlarge existing habitats, especially where extent is small or declining, through habitat restoration and creation with adjoining and nearby areas, green infrastructure features and networks.
Condition	Ecosystems and biodiversity assets need to be in a healthy condition to function effectively, to deliver a range of important ecosystem services and be more resilient to external

	influences. Good condition requires sufficient scale and functioning natural processes or appropriate management to provide structural comply and sustain diverse mosaics of habitats. Strategic planning and individual development proposals must not compromise the condition of ecosystems.
Connectivity	Connectivity refers to the links between and within habitats, which may take the form of corridors, stepping stones or patches of the same or related vegetation types. Environmental factors such as geology, soil type or hydrological links affect sea / landscape connectivity. For any given species, connectivity is related to the relative distance that species can move to feed, breed and complete lifecycles that may need different environments. Individual development proposals should identify and incorporate measures which enable appropriate links to be made between the site and its surroundings so as to improve connectivity.
Adaptability to change	Resistance and recovery from pressures arise when the attributes of ecosystem resilience – diversity, extent, condition and connectivity of ecosystems are in good condition. Habitats and species are not static: planning for nature recovery should aim to sustain habitats and associated species as the geography and land use changes around them, harnessing natural processes and opportunities for nature-based solutions. This means that strategic planning and individual development proposals should identify impacts to the ecosystem resilience attributes of biodiversity, using the pressures identified in State of Natural Resources Report (SoNaRR).

The step-wise approach

- 2.3.7 The step-wise approach seeks to help developments secure a net benefit for biodiversity, by ensuring that each step reduces the potential environmental effects and secures enhancements. Applicants are required to prepare proposals which will achieve a net benefit for biodiversity and must demonstrate how they have used the step-wise approach.
- 2.3.8 The step-wise approach is summarised in **Table 2.2** and depicted in **Figure 2.1**. **Figure 2.1** reflects the step-wise approach detailed in paragraph 6.4.15 of PPW12. As illustrated in **Figure 2.1**, enhancement measures should be applied during each step.

Table 2.2: Description of the step-wise approach

Step	Description
Step 1: Avoid	The first priority is to avoid damage to biodiversity. Planning authorities are to be satisfied that any alternative sites have been fully considered.
Step 2: Minimise	When all locational, siting and design options for avoiding damage to biodiversity have been exhausted, applications must seek to minimise impact on biodiversity (i.e., maintaining the largest possible area of existing habitat, ensuring any retained habitats remain well connected, developing management plans, etc.)
Step 3: Mitigate/Restore	If, after measures to minimise impact, biodiversity could still be lost, damaged by residual impacts; mitigation measures must be put in place to limit the negative effects of a development
Step 4: Compensate off site	When steps 1 to 3 have been exhausted, and as a last resort option, onsite compensation for unavoidable damage should be provided. Onsite compensation includes circumstances where like for like mitigation or onsite restoration is not possible.
Step 5: Management plan	Each stage of the step-wise approach must be accompanied by a long-term management plan which details the avoidance, minimisation, mitigation/restoration and compensation measures alongside the enhancement measures.

Step 6: Refuse planning permission	Where the adverse effect on biodiversity and ecosystem resilience clearly outweighs other material considerations, the development should be refused.
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Figure 2.1: Summary of the step-wise approach



Designated sites

- 2.3.9 In considering biodiversity and ecological networks within PPW12, the third bullet point in Paragraph 6.4.3 of PPW12 notes that development plan strategies, policies and development proposals must consider the need to *'ensure statutorily and non-statutorily designated sites and habitats are properly protected and managed and their role at the heart of resilient ecological networks is safeguarded'*.
- 2.3.10 As detailed in paragraph 6.4.18 of PPW12, both statutorily and non-statutorily designated sites make a vital contribution to protecting biodiversity, maintaining the resilience of ecosystems and are important in providing opportunities for achieving wider well-being objectives. Paragraph 6.4.19 states that *'...all designated sites must be able to continue to protect the biodiversity and features for which they were designated and contribute to the resilience of ecosystems at the appropriate scale. This ability should not be compromised by inappropriate development or other activity'*
- 2.3.11 Designated sites such as Special Areas of Conservation, Special Protection Areas, Ramsars, Sites of Special Scientific Interests (SSSIs) and National Nature Reserves (NNR) must be protected from damage and deterioration because of their important contribution to wider resilient ecological networks, as detailed above. Therefore, developments within these sites should be avoided save in the circumstances noted in PPW12. However, non-statutory and development plan designations should still be considered in line with the step-wise approach.

3 LOCAL POLICIES AND PLANS

3.1 Introduction

- 3.1.1 This section provides an overview of the relevant green infrastructure policies relating to Newport City Council, Torfaen County Borough Council and Monmouthshire County Council. It also includes an

overview of NRW's Area Statements⁴, which identify areas where action at the right scale can maximise ecological networks and ecosystem benefits. The Area Statements do not have policy status but provide guidance which can be considered relevant to green infrastructure.

3.2 Future Wales: The National Plan 2040

- 3.2.1 Future Wales is the Welsh Government's National Development Framework and is the highest tier of the Development Plan in Wales. The purpose of Future Wales is to ensure the planning system at all levels is consistent with, and supports the delivery of, Welsh Government strategic aims and policies. Future Wales provides the spatial direction for development in Wales and the policy framework for Local Development Plans (LDPs). These plans are required to conform to Future Wales and planning decisions at every level must be taken in accordance with the Development Plan.
- 3.2.2 Section 2 of Future Wales sets out how it has been informed by climate change issues, including projections showing an increased chance of milder, wetter winters and hotter, drier summers, rising sea levels and an increase in the frequency and severity of extreme weather events.
- 3.2.3 Section 3 includes the Future Wales' Outcomes which are described as "collectively a statement of where we want to be in 20 years' time. Every part of Future Wales...is concerned with achieving the Outcomes".
- 3.2.4 Policy 17 of Future Wales notes that the Welsh Government strongly supports the principle of renewable and low carbon energy development from all technologies and at all scales to meet our future energy needs. Furthermore, it states:

"In determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency. In Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in policy 18. Applications for large-scale wind and solar will not be permitted in National Parks and Areas of Outstanding Natural Beauty and all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment. Proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities. New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities..."

- 3.2.5 As highlighted in Section 2.1, Policy 9 of Future Wales refers to 'Resilient Ecological Networks and Green Infrastructure' and seeks to "ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure". The policy requires the Welsh Government to work with key partners to 'identify areas which should be safeguarded and created as ecological networks' and 'identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking'. It also requires planning authorities to include these areas and opportunities in their development proposals, and to demonstrate action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), through innovative, nature based approaches to site planning and the design of the built environment.

⁴ Natural Resources Wales (2024). Introduction to South East Wales Area Statement. Available at: [Natural Resources Wales / South East Wales Area Statement](#)

3.3 Newport City Council

- 3.3.1 Objective 2 of Newport City Council's current Local Development Plan (LDP)^{5,6} states a target to increase the number of renewable energy schemes permitted. Additionally, objective 2 of the LDP is to ensure *'that development and land uses in Newport make a positive contribution to minimising, adapting to or mitigating against the causes and impacts of climate change...'*

3.4 Torfaen County Borough Council

- 3.4.1 Torfaen County Borough Council adopted its current LDP in 2013. It was reviewed in 2017 and decided that a revised plan was needed, therefore, the LDP adopted in 2013 has been used to inform this GIS. Strategic Policy 2 of Torfaen's County Borough Council adopted LDP⁷ provides criterion that should be considered to seek to mitigate the causes of further climate change and adapt to the current and future effects of climate change such as promoting sustainable design.
- 3.4.2 Additionally, Torfaen County Borough Council published a 'Torfaen Green Infrastructure Assessment' in December 2021. It references green infrastructure as defined in PPW and also makes particular reference to the Well-being for Future Generations Act 2015, which it states challenges public bodies to think holistically.
- 3.4.3 In terms of local biodiversity issues, the Torfaen Green Infrastructure Assessment states that the following issues are a particular problem in Torfaen:
- A reduction in tree canopy and consistent non-replacement of mature street trees; > Habitat fragmentation;
 - Lack of connectivity between wildlife sites;
 - Habitat patch isolation (linking to fragmentation and connectivity);
 - Declining area of existing sites;
 - Building too close to existing mature trees, hedgerows, woodland and ancient woodland sites;
 - Lack of grassland habitat;
 - Continuing loss of semi-natural grassland areas to development and agricultural improvement;
 - Insufficient management of key habitats;
 - Invasive non-native species;
 - Poor ecological status of some of Torfaen's water courses;
 - Upland drainage;

⁵ Newport City Council (2015). Newport Local Development Plan 2011 – 2026. Available at: [LDP-Adopted-Plan-January-2015](#)

⁶ A replacement Local Development Plan is being prepared by Newport City Council, however, this has not yet been adopted.

⁷ Torfaen County Borough Council (2006). Adopted Local Development Plan 2006 – 2021. Summary Leaflet. Available at: [LDP-summary-English.pdf](#)

- Historic approaches to the management of water in the Uplands has impacted on bog and mire habitat;
- More water retention interventions are required to reverse the damage; and
- Inhospitable urban environments.

3.5 Monmouthshire County Council

- 3.5.1 Strategic Policy S12 of the Monmouthshire County Council's Adopted Local Development Plan⁸ requires new development to demonstrate sustainable and efficient resource use. This includes energy efficiency, increasing the supply of renewable energy, using sustainable construction materials and techniques, water conservation/efficiency and waste reduction.

3.6 Natural Resources Wales Area Statements

- 3.6.1 In 2020, Natural Resources Wales (NRW) published the first version of Area Statements, which cover seven different and diverse parts of Wales. The Area Statements set out the key challenges and opportunities to strengthen ecological networks and ecosystem services at a local scale. They identify areas where taking action at the right scale can maximise benefits.

- 3.6.2 NRW state that in the Southeast they have taken a: *"landscape scale approach to producing the Southeast Area Statement. This means that we have considered where and why we want to build ecosystem resilience in terms of the special and distinctive landscape areas of our place. Working in this way will allow us to address the increasingly complex and widespread environmental, social and political challenges that transcend traditional management boundaries. These challenges, including the climate and nature emergencies, will require us all to work differently. To do this, we have to really understand the people, the place and the ways in which we interact with the environment."*

To realise the benefits that nature can provide, our natural areas must be healthy and resistant to threats and disturbance. The capacity of natural resources to provide this function is called Ecosystem Resilience. Ecosystem Resilience can be considered a measure of health. The healthier (or more resilient) the ecosystem is, the more likely it is to survive, thrive and benefit people and communities."

- 3.6.3 The Southeast Area Statement contains four themes, namely:

- Linking Our Landscapes;
- Climate Ready Gwent;
- Healthy, Active, Connected;
- Ways of Working.

- 3.6.4 The Statement sets out that the collaborative actions identified under each theme are underpinned by best available evidence, local knowledge and understanding gathered throughout this process.

⁸ Monmouthshire County Council (2014). Adopted Local Development Plan. Available at: [Adopted-Local-Development-Plan-with-PDF-tags.pdf](#)

4 ENVIRONMENTAL CONTEXT

4.1 Introduction

- 4.1.1 The following chapter presents an overview of the environmental features present on the Site, and in line with PPW12, highlights the baseline data, informed by surveys and assessments undertaken for the Proposed Development.

4.2 Habitats

- 4.2.1 The following habitats⁹ have been recorded within the Site, habitats of principal importance¹⁰ are depicted in bold.

- c1c Non-cereal crop;
- g1c Bracken;
- g3: Neutral grassland
- g3c: Other neutral grassland;
- g3c8: *Holcus-juncus* neutral grassland;
- g4: Modified grassland;
- h3a: Blackthorn scrub;
- h3d: Bramble scrub;
- h3h: Mixed scrub;
- u1b: Developed land; sealed surface;
- u1b5: Buildings;
- u1c: Artificial unvegetated, unsealed surface;
- **w1d: Wet woodland;**
- **w1f: Lowland mixed deciduous woodland;**
- w1g: Other broadleaved woodland;
- w1h5: Other woodland; mixed; mainly broadleaved;
- w1h6: Other woodland; mixed; mainly conifer;
- r1f6: Other temporary ponds and scrapes;
- **h2a: Native hedgerow;**

⁹ Classified as per UKHabitat Classification Survey

¹⁰ Listed on Section 7 of the Environment Act Wales (2016).

- **h2a5: Species-rich native hedgerow;**
- h2a6: Other native hedgerows;
- **r1: Standing open water and canals;**
- r1g: Other standing water;
- **r2: Rivers and streams;**
- r2b: Other rivers and streams;
- u1e: Built linear features;

4.2.2 Detailed descriptions of these habitats are provided in Chapter 6 and Appendix 6.1: Habitats and Vegetation.

4.3 Woodland, trees and hedgerows

- 4.3.1 An arboricultural survey was conducted for the Site. This survey report, provided in, **Appendix 5.10**, recorded 54 arboricultural features which would be impacted by construction including three individual trees, six tree groups and 25 hedgerows, amounting to 161.5m.
- 4.3.2 There are trees protected under a Tree Preservation Order (TPO) within the Site, three veteran trees and one ancient tree.
- 4.3.3 The following woodland groups recorded are designated as Ancient Semi Natural Woodland (ASNW): W1, W3, W6, W7, W10, T57, T132, T216 and T217.

4.4 Designations

Statutory designated sites for nature conservation

- 4.4.1 There are no statutory sites designated for nature conservation located within any of the land parcels, the nearest statutory designated site is River Usk / Afon Wysg (SAC) located approximately 1.4 km southeast.

Non-statutory designated sites for nature conservation

- 4.4.2 Stands of ancient semi natural woodland designated as Site of Importance for Nature Conservation (SINC) partially overlap and abut the Site boundary. Ponthir Sewage Works Site of Importance for Nature Conservation (SINC) and Afon Llwyd Grasslands SINC are located immediately south of the Site.

Special Landscape Area

- 4.4.3 Land parcels 6A-C, 7A&B, 8A&B, 9A&B, 12A-C and 13A-H are located within the Torfaen Special Landscape Area within Landscape Unit (LAU) 59, Countryside East of Cwmbran as defined by the 2021 Sensitivity Capacity Study for Renewable Energy Development. The remainder of the land parcels are not located within a designated landscape area.

Cultural heritage

- 4.4.4 There are no designated historic assets located within the Site, the nearest heritage asset is Candwr Camp immediately south of land parcel 10 (reference: MM135).

- 4.4.5 The nearest designated historic asset to the Site is the Scheduled Monument of Candwr Camp, located c. m south-west of land parcel 10 (Cadw reference: MM135).
- 4.4.6 There are Listed Buildings within a 1km radius of the Site, the nearest to the Site being:
- The Grade II* Listed All Saints Church at Llanfrehfa, c.150m west of Parcel 13 (Cadw reference: 3142);
 - The Grade II Listed Building of Glansirhowy Farm, c.100m south-south-west of Parcel 7 (Cadw reference: 3141);
 - The Grade II Listed Building of Little Creiggydd, c.25m east of Parcel 3 (Cadw reference: 2674); and
 - The Grade II Listed Building of Barn at Pen-twyn Farm, c.20m south of Parcel 12 (Cadw reference: 26129)

Air quality

- 4.4.7 The Site is not located within an Air Quality Management Area (AQMA) the closest to the Site is the Caerleon High Street AQMA declared for Nitrogen dioxide located approximately 1.6km south of land parcel 12.

5 APPLICATION OF THE STEP-WISE APPROACH TO THE PROPOSED DEVELOPMENT

5.1 Introduction

- 5.1.1 This section demonstrates how the principles set out in the step-wise approach outlined in PPW12 have inherently informed the Site selection and design of the Proposed Development. This section also highlights the positive biodiversity outcomes that will be realised as a result of the Proposed Development.
- 5.1.2 This section describes how the following step-wise approach has been undertaken throughout the design evolution of the Proposed Development:
- Step 1 Avoid;
 - Step 2 Minimise;
 - Step 3 Mitigate;
 - Step 4 Compensate; and
 - Step 5 Development of management plans.
- 5.1.3 PPW12 notes that pre-application surveys, research and data searches by developers will be necessary to establish the baseline state of biodiversity and ecosystem resilience onsite, taking into account the Site's contribution to resilient ecological networks through its diversity, extent, connectivity and condition and the provision of ecosystem services.
- 5.1.4 In support of the Proposed Development and informed by both pre-application dialogue and the Environmental Impact Assessment (EIA) Scoping Direction, the Applicant has prepared an ES which includes chapters focusing on: biodiversity (terrestrial ecology and ornithology), water resources, air quality, built heritage, landscape and visual, traffic and transport, and agricultural classification. These chapters are supplemented by technical assessments which include baseline data, survey methodology and results.

5.2 Step 1 – Avoid

- 5.2.1 Paragraph 6.4.15 (1b) of PPW12 highlights that proposals in statutorily designated sites are, as a matter of principle, unacceptable and therefore must be excluded from site searches undertaken by developers. It goes on to state that this principle also extends to those sites containing protected species and habitats which are irreplaceable. PPW12 defines habitats that are irreplaceable as those which would be technically very difficult to restore, recreate or replace once destroyed, e.g. ancient woodland, sand dunes, peatland, salt marsh and lowland fen.
- 5.2.2 The Site selection criteria applied to the Proposed Development included early desk based assessment of the Site's technical, engineering and environmental constraints including known heritage, ecological, hydrological and other statutory designations from publicly available datasets (including peat maps from the Welsh Government's DataMapWales), utilities and services to provide information regarding the suitability of the Site for solar development and the potential land area where solar panels and associated infrastructure could be placed. A suitable nearby grid connection point with available capacity was found at an underground cable connection between the Land Parcels to the National Grid Electricity Distribution point of connection at the Dŵr Cymru Court Farm Water Treatment Works within the Site, connecting into the 132kV overhead power lines passing through the Site, as well as demonstration that the Site is accessible for delivery, construction and operational traffic. **Chapter 4** outlines the full details of the Site selection process.
- 5.2.3 The Site was selected on the basis that it was considered that a viable solar farm could be designed and built in this location whilst avoiding key environmental assets as identified at the site selection stage, in line with the step-wise approach (Step 1 – Avoid).
- 5.2.4 The Site is not located within or adjacent to any statutory ecological designations.

Design strategy

- 5.2.5 The design evolution strategy was guided by the principles of avoiding, minimising or offsetting significant adverse environmental effects while maintaining operational efficiency and cost-effectiveness, and responding to feedback from consultations. **Chapter 4**, lists the design constraints which guided the positioning of the solar panels and infrastructure, of relevance to green infrastructure and Step 1 of the step wise approach including:
- Ecology: Avoiding direct/indirect impacts on habitats of principal importance and avoiding direct/indirect impacts on species protected under Welsh or international law;
 - Ecology: Maintaining buffers of at least 5m around hedgerows and vegetation to retain and protect connectivity corridors for a multitude of species;
 - Ecology/Arboriculture: Maintaining a 15m buffer (apart from one location) around ancient woodland to protect
- 5.2.6 Ecology/Hydrology: Maintaining a 7m buffer where possible from watercourses and minimising the number and extent of new watercourse crossings;

Habitats

- 5.2.7 As noted in **Chapter 6**, a variety of surveys have been undertaken during the design stage including habitat surveys, arboriculture surveys, individual species surveys, agricultural land classification survey and surveys of abiotic factors including hydrology and soils. The results of these were used to avoid, where possible, permanent loss of high value and sensitive habitats.

- 5.2.8 Prior to construction the Ecological Clerk of Works (EcoCoW) will demarcate and set construction exclusion zones around watercourses, identified badger setts and any invasive, non-native species to avoid their spread during construction to avoid any spread of invasive, non-native flora.
- 5.2.9 Furthermore, the Newport, Torfaen and Monmouthshire Local Nature Recovery Biodiversity Action Plans were reviewed so that consideration of locally important species and habitats identified within it are appropriately accounted for and that net biodiversity loss of these species and habitats were avoided.

Woodland, trees and hedgerows

- 5.2.10 Stands of ancient woodland partially overlap the Site boundary. There will be no direct impacts on ancient woodland through land-take and buffers to protect ancient woodland have been built into the design, however, encroachment into a buffer is anticipated to occur in one location, to avoid impacts to a group of class C2 trees. There will be no direct impacts to the ancient woodland in this location; the proposals in this location are to use the existing fjord between Field 6a and 7b. In doing so, access between these fields is obtained as per current farming practices and negates the need for widening access along this linear feature and partially removing a group of class C2 trees (refer to Appendix 5.10 for further details on the no dig road within the ancient woodland buffer).
- 5.2.11 Three veteran trees and one ancient tree has been identified within the Site. Direct impacts on these trees have been avoided.

5.3 Step 2 – Minimise

Design strategy

- 5.3.1 Once options for avoiding loss of or damage to biodiversity have been exhausted, Paragraph 6.4.15 (2) of PPW12 requires that applicants must seek to minimise the initial impact on biodiversity and ecosystems by e.g. maintaining the largest possible area of existing habitat supporting biodiversity and functioning ecosystems, particularly habitats and species where present; ensuring that retained habitats continue to be well connected to adjacent habitats; and retaining existing features.
- 5.3.2 As detailed in **Chapter 4**, the design has sought to balance the capacity for energy generation and environmental and technical constraints. It has not been possible, however, for the Proposed Development to avoid all environmental effects. As such, effects have been minimised wherever possible. The changes that were made during the design evolution relating to 'Step 2: minimise' include:
- Access tracks proposed to utilise existing hedgerow gaps wherever feasible;
 - Length of track for haul road minimised following results of arboriculture and ecological surveys;
 - Reduction in solar panel developable areas.
- 5.3.3 The total developable area of the 131.62ha Site is 44.58ha with the remaining 36.1% of the Site retained as existing or enhanced with landscaping and/or ecological enhancements.
- 5.3.4 Further details of embedded design measures to minimise the potential effects to changes to surface water flows are outlined in **Chapter 9** and **Appendix 9.1**. With these in place, adverse effects on water quality will also be minimised. Effects on flood risk and drainage will be managed according to sustainable drainage systems (SuDS), as indicated within **Chapter 9** and **Appendix 9.1**. The proposed SuDS will be subject to approval from the SuDS Approval Body (SAB) and includes the use of swales and permeable basins which have been utilised in the surface water drainage strategy to minimise the

impacts of physical changes during operation on surface water flow. A full SAB application and detailed drainage design will be prepared in the future. Drainage would be designed with consideration of the Building with Nature Standards.

Habitats

5.3.5 **Chapter 6** and the **oCEMP** describe measures taken to minimise the impacts of the Proposed Development on surrounding habitats and protected species. Some key minimisation measures include:

5.3.6 Protection of habitats will be implemented through the use of heras fencing/similar to protect ecological or hydrological features ((woodland (10m), ancient woodland (15m), hedgerows (5m) and watercourses (7m)) during the site preparation works and construction phase of the project.

- The works will adhere to 'British Standards BS5837:2012 Trees in relation to design, demolition and construction' as set out in **Appendix 5.10**.
- Pre-construction surveys for protected species will be undertaken (badger, water vole and otter) prior to the commencement of construction activities for the Proposed Development to confirm the presence or absence and to minimise disturbance. The results will inform any protection and/or mitigation requirements to minimise disturbance.
- Precautionary working method statements (PWMS) would be implemented to avoid significant impacts on dormouse and reptile populations, if present. The PWMS would include a 'toolbox talk', and a species-specific strategy to clear vegetation sensitively.
- A Fisheries Management and Monitoring Plan (FMP) will be implemented to record pre-, during, and post- construction fish populations with measures to protect fish during construction will be included in the **CEMP**.
- All construction work associated with watercourse crossings should be undertaken outside the recommended spawning, incubation and emergence times thus minimising disturbance.
- Pre-construction nesting bird surveys will be undertaken to locate any nests and minimise disturbance to breeding birds if works affecting vegetation cannot be undertaken outside the nesting season. If a new nest site should be located, works will avoid these areas during the period of between one hour before dusk and one hour after dawn.
- Best practice methods will be implemented during the construction and operational phase to reduce the impact on the water environment by managing risk from sedimentation and potential contamination.

5.3.7 During construction, a sensitive lighting strategy will be implemented (no nighttime working) within 10 m of any watercourses, and any lighting will be directed away from watercourses and terrestrial habitats to minimise disturbance.

5.3.8 No fixed permanent external lighting is proposed during operation, however, if unavoidable (i.e. for health and safety reasons) use will be restricted to the proposed substations on Site and will operate under strict controls:

- Manually switched off;
- Normally off;
- Equipped with movement sensors, where appropriate; and,

- Used only during site visits.

5.3.9 These control measures ensure minimal illumination and prevent any form of continuous or unnecessary lighting.

5.3.10 The **oCEMP** sets out that works will be scheduled outside of bird breeding seasons, where possible (typically March to August) to minimise the likelihood of disturbing sensitive bird species. The pre-commencement surveys will identify any active nests up to a maximum of 750 m with protection measures to be implemented to prevent disturbance.

5.4 Step 3 – Mitigate/Restore

5.4.1 Paragraph 6.4.15 (3a) of PPW 12 states that where biodiversity and ecosystems could still be damaged or lost after measures to minimise impact, a proposal should mitigate that damage to limit the negative effects of the development.

Habitats and key species

5.4.2 Extensive ecological surveys have been undertaken (**Chapter 6**) and have informed the mitigation and compensation measures detailed in the **oLEMP**. Mitigation and compensation measures include (but are not limited to):

- Employment of an EcoCoW during construction to oversee ecologically sensitive activities, agree and monitor measures designed to minimise damage to retained habitats and; undertake pre-construction surveys/checks and advise on ecological issues and working restrictions where required.
- A detailed **CEMP** will be developed and implemented prior to construction to ensure all mitigations identified within the ES are implemented throughout the construction phase. This will be secured by a planning condition. Should signs of otter presence be confirmed, suitable mitigation measures will be implemented, as advised by the EcoCoW including but not limited to implementing appropriate exclusion zones (200 m from breeding holts, 30 100 m from non-breeding holts) and seeking a Mitigation Licence issued by NRW.
- An EcoCoW will demarcate relevant trees within the Site suitable for roosting bats prior to construction. Micro siting of proposed infrastructure will be employed to retain trees suitable for bat roosting where possible within the Site. Pre-construction inspections of trees and further surveys pre-cautionary working methods and licensing will be obtained if micro siting is not possible.

Woodland, trees and hedgerows

5.4.3 As outlined in **Appendix 5.10**, any tree works required to facilitate the Proposed Development will be carried out in accordance with British Standards BS5837. Tree protection measures shall be specified within an Arboricultural Method Statement (AMS). All retained trees and tree groups shall be protected by fencing. Any fenced areas will form a Construction Exclusion Zone and will remain undisturbed for the duration of construction unless approved works are required within it. Such works should be undertaken under arboricultural supervision and in line with an approved method statement. All site operatives should be made aware of the need to respect the fencing, and signage should be affixed to every third panel to ensure it is not moved.

5.4.4 PPW12 states that tree planting should be replaced at a 3:1 ratio. A total of 25 trees are proposed to be removed to facilitate the proposals, therefore, the replanting of 75 trees mitigates for this loss.

- 5.4.5 PPW12 does not state specific for hedgerow replacement, however, 161.5m of hedgerow are proposed to be removed, therefore, like-for-like replacement planting of 161.5m of hedgerow will mitigate for this loss.
- 5.4.6 Further planting is proposed and this is classified as enhancement (Step 4 – Compensate) and is set out in Section 5.5 below.

Water and drainage

- 5.4.7 The following key mitigation measures, as outlined in **Chapter 9** and the **oCEMP** will be implemented:
- Pollution prevention measures, as well as spillage and emergency response procedures are included in the **oCEMP**. A Pollution Prevention and Incident Plan will be developed to manage the risk of pollution.
 - A Pollution Management Plan (PMP) will be secured via the **CEMP**
 - A Flood Consequence Assessment and Surface Water Drainage Strategy is provided in **Appendix 9.1**.
 - Construction Surface Water Management Plan will be developed;
 - A Water Quality Management Plan will be secured by the **CEMP**.
 - A Soils Management Plan will be secured by the **CEMP**.
- 5.4.8 The above mitigations ensure land and water are managed sustainably through the implementation of robust plans. The measures included will protect sensitive ecosystems, safeguard soil integrity and maintain hydrological balance within the Site. Collectively this promotes long-term resilience of natural assets.

5.5 Step 4 – Compensate

- 5.5.1 Paragraph 6.4.15 (3b and 4) of PPW12 notes that where like-for-like mitigation measures are not possible it may be necessary to consider on-site compensation measures in the first instance. Off-site compensation measures should be considered as a last resort. Paragraphs 6.4.5 and 6.4.11 of the PPW12 also state that Net Benefit for Biodiversity should be provided either on or immediately adjacent to a subject site.
- 5.5.2 Although the losses have been minimised where possible, a total of 52 arboricultural features are identified for removal, partial removal or impacted due to construction of Site access, track widening, and earthworks. As proposed in the **oLEMP**, a suitable landscaping scheme is proposed. Of which the following is classified as compensation (enhancement) for the native tree and hedgerow losses; 26,792m² (2.6ha) of new woodland planting, 19no. native hedgerow trees, 19no. orchard trees and 2,241.5 linear m of hedgerow. Additionally, with sensitive working methods, and robust tree protection, the Proposed Development is considered arboriculturally acceptable.
- 5.5.3 As set out in Section 5.4, the loss of certain habitats, such as hedgerow, will be mitigated with like for like replacement, plus the delivery of additional enhancements. The remaining habitat loss associated with the Proposed Development will be compensated by enhancing parts of the remaining habitat and creating higher quality habitats on areas of existing low-quality habitat. In line with the DECCA framework, measures are proposed to facilitate biodiversity enhancements.
- 5.5.4 To compensate and enhance for the loss onsite a number of habitats will be targeted for creation and enhancement and will be appropriately managed (as detailed in the **oLEMP**). In addition to the mitigation by design habitat creation and enhancement measures provided through **Figure 5.5:**

Landscape Strategy the following measures will be included as part of the Proposed Development to provide ecological enhancement, as set out in and secured via the **oLEMP**. These measures have been identified based on the baseline surveys to date (as described above), consultation responses and local/national priorities. The measures include:

- 2,241.50 linear m of hedgerow planting;
- Approximately 2.6ha of new woodland planting;
- 18no. native hedgerow trees;
- 18no. orchard trees;
- Enhancement of approximately 0.18ha existing low value (modified grassland) grassland to botanically diverse grassland;
- Enhancement of approximately 22.84ha of existing low value (modified grassland) grassland to other neutral grassland;
- Enhancement of approximately 9.7ha of arable land to organic set-aside;
- Enhancement of approximately 4.3ha coastal floodplain grazing marsh;
- Creation of hibernacula to improve shelter and refuge opportunities for wildlife;
- 44 no. general purpose bird boxes (mixture of hole and open-fronted);
- 4 no. barn owl boxes;
- 2 no. raptor boxes;
- 30 no. bat boxes, including minimum;
 - 5 no. hibernation boxes;
 - 5 no. colony boxes;
- 10 no. reptile/ amphibian refugia;
- 10 insect hotels; and
- 10 no. hedgehog boxes.

5.5.5 These measures would more than mitigate/compensate for the habitat losses of the Proposed Development and would provide enhancements by targeting key species and leading to a net biodiversity benefit across the Site in line with PPW12.

5.5.6 Enhancement opportunities are multi-faceted and will all contribute to increasing the resilience of ecological networks onsite and in the surrounding area. Enhancement opportunities are detailed in the oLEMP.

5.5.7 Through implementation of the measures within the **oLEMP**, the project will achieve a net benefit for biodiversity, for habitats and species.

5.5.8 No significant effects on biodiversity are likely through the adherence of the avoidance, minimisation, mitigation and compensation measures set out above.

- 5.5.9 The oLEMP has demonstrated how net benefit for biodiversity can be delivered for habitats and species, through at least the construction, operation and decommissioning phases, whilst improving green infrastructure and the resilience of ecosystems.

5.6 Step 5 – Development of management plans

- 5.6.1 The Proposed Development will include management plans over the lifetime of the Proposed Development that will provide long-term control and security of the enhancements documented.
- 5.6.2 Monitoring of the implementation of dust and pollution prevention measures included in the **oCEMP** will be the responsibility of the contractor. Further specific associated management plans have been recommended, and would be implemented through the **CEMP** prior to construction works. These include plans such as the Soils Management Plan, Drainage Management Plan, and Water Quality Management Plan as well as Species Protection Plans and a Fisheries Monitoring and Management Plan.
- 5.6.3 Monitoring is proposed as part of the **oLEMP** during operation this would consist of checks of the habitat enhancement measures detailed in the **oLEMP**. The monitoring plan would also include details of checks of the habitat mitigation and habitat enhancement measures, and details of response and remediation measures in the event that mitigation/enhancement measures are found not to be performing.
- 5.6.4 Monitoring would be also undertaken during construction in accordance with the **oCEMP** in relation to pollution prevention measures, drainage management, dust prevention and suppression measures, fish monitoring and water quality monitoring (pre, during and post-construction).
- 5.6.5 The monitoring that will be implemented above, will contribute to ensuring that land, air and water will be managed sustainability, through measures to reduce pollution, and improved management of water quality for on-site water resources. The new planting monitoring, as proposed in the **oLEMP**, demonstrates the commitment to improve the ecosystem quality by allowing native species to thrive, improving biodiversity, connectivity, and habitat management to ensure longevity, a key theme within the South East Wales Area Statement.
- 5.6.6 For more detail refer to the **oLEMP**, which has been provided as part of the planning application.

5.7 Green infrastructure improvements in the context of climate change

- 5.7.1 In 2019 the Welsh Government declared a climate emergency in order to co-ordinate action nationally and locally to help combat threats of climate change. Welsh Government planning policy recognises an energy hierarchy and expects all new developments to mitigate the causes of climate change in accordance with the energy hierarchy for planning. These are set out in the following energy policies:
- Reducing energy demand;
 - Increasing energy efficiency;
 - Renewable energy generation;
 - Minimising carbon impact of other green generation; and,
 - Minimised extraction of carbon intensive energy materials.
- 5.7.2 PPW12 discusses how green infrastructure helps to improve ecosystem resilience resulting in positive benefits to well-being including climate change mitigation. The benefits of which are important in

urban environments where they can facilitate health and well-being related benefits of open space and clean air.

- 5.7.3 In the context of achieving benefits for green infrastructure through addressing the consequences of climate change, the Proposed Development provides significant positive outcomes for carbon losses and savings as described in the **Appendix 2.6**. The Proposed Development generates upfront and decommissioning emissions of approximately 43,579 tCO₂e; however, these are offset within the early operational phase through the displacement of fossil fuel electricity generation, with carbon savings of 85,631 tCO₂e achieved by 2034 alone. The Proposed Development therefore achieves rapid carbon payback and delivers a substantial net lifecycle reduction of 193,251 tCO₂e.. The Proposed Development will make a considerable contribution to the reduction of greenhouse gas emissions and climate change by reducing the consumption of fossil fuel generated mains electricity, thereby indirectly providing a benefit to the ecosystems and green infrastructure within and around the Proposed Development.

5.8 Summary and Conclusions

- 5.8.1 This GIS, and the ES submitted with the planning application, demonstrates how the step-wise approach has been applied by the Applicant for the Proposed Development, and an assessment has been applied effectively to deliver positive multi-functional outcomes that are proportionate and appropriate for green infrastructure within the Site. The principles set out in the PPW12 step-wise approach have been followed throughout the Site selection process and design evolution of the Proposed Development and demonstrated in Section 5 of this GIS.
- 5.8.2 The resulting Proposed Development is in accordance with a range of legislative and policy matters, including but not limited to: Future Wales, Planning Policy Wales (PPW12); Newport City Council LDP, Torfaen County Borough Council LDP, Monmouthshire County Council LDP and NRW's Area Statements.
- 5.8.3 The Site is not located within any ecologically connected statutorily designated sites. The Site selection, surveys and early design evolutions allowed for a range of constraints to be avoided in the first instance. Where impacts were unavoidable, minimisation efforts were introduced throughout the design evolution for impacts to protected habitats and species. Mitigation measures were embedded into the design as well as incorporating additional measures to further reduce residual effects. In cases where impacts could not be fully mitigated, appropriate compensation measures were identified on Site to ensure ecological functionality is maintained and to support biodiversity resilience within the wider landscape.

Habitats

- 5.8.4 The design strategy has been developed and implemented to effectively avoid permanent loss of high value and sensitive habitats. Where avoidance has not been possible, the effects of the Proposed Development have been minimised.
- 5.8.5 A range of mitigation measures are also proposed to further reduce and off-set potential adverse effects. Mitigation measures will be implemented during construction and include pre-construction checks for a number of protected species and employment of an EcoCoW to oversee ecologically sensitive activities and measures included in the **CEMP**.
- 5.8.6 The measures proposed in the **oLEMP** for habitats, including habitat enhancement measures including creation of nesting, roosting and resting opportunities for wildlife, are of substantial scale. The creation of new habitats and replacement tree planting will be implemented. Proposed habitat enhancements will improve the condition of existing habitats. The Proposed Development will therefore achieve net benefit for biodiversity, increase the diversity and extent of species and habitats present within the Site and positively contribute to achieving ecosystem resilience.

Woodland, trees and hedgerows

- 5.8.7 The Proposed Development has been designed to avoid damage to woodland, trees and hedgerows wherever possible.

Water and drainage

- 5.8.8 The Flood Consequence Assessment and Surface Water Drainage Strategy will include measures to maintain site runoff within the natural catchment areas and include appropriate drainage measures to mimic the natural site drainage, secured by condition prior to construction.
- 5.8.9 Additionally, the surface water drainage strategy has been proposed to manage surface water runoff from the proposed development to ensure runoff rates and associated flood risk on Site and elsewhere do not increase. A notable surface water betterment is provided by the proposed surface water drainage strategy.
- 5.8.10 Standard practice pollution prevention measures will be undertaken, and measures will be put in place to avoid non-chemical pollution. A Soils Management Plan will be implemented to mitigate any adverse impacts soils and site runoff. With these in place, potential effects on changes to overland drainage and surface water flows and adverse effects on water quality would be minimised.

Conclusion

- 5.8.11 The approach to design, mitigation and on-site compensation measures will create enhanced green infrastructure on-site through improved condition, extent and connectivity of habitats, delivering benefits for key species such as birds, bats, invertebrates and mammals. These enhancements directly contribute to the achievement of local, regional, and national priorities for biodiversity and green infrastructure in Wales.
- 5.8.12 The Applicant is committed to the DECCA framework, and this has underpinned their consideration of green infrastructure during the design of the Proposed Development. The resulting positive benefits achieved should also be seen in the context of the significant positive outcomes for carbon losses and savings that the Proposed Development provides, addressing climate change through the provision of clean energy generation.