



Pennant Walters Ltd

MYNYDD LLANHILLETH WIND FARM

Green Infrastructure Statement





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EXECUTIVE SUMMARY

This Green Infrastructure Statement supports a planning application for the development of up to seven wind turbines at Mynydd Llanhilleth, to east of Brynithel and Llanhilleth and west of Talywain, Pontypool. This statement has been produced for the purpose of describing how green infrastructure has been incorporated into the design of the Proposed Development and how the step-wise approach has been used to ensure that loss of habitat is avoided and minimised and impacts on protected and priority species are appropriately mitigated, where necessary. An assessment is also included within the statement which utilises The Building with Nature standards. As set out within Planning Policy Wales these standards represent good practice.

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1 INTRODUCTION

1.1 BACKGROUND

- 1.1.1. This Green Infrastructure Statement (GIS) has been prepared by WSP UK Ltd (WSP) on behalf of Pennant Walters Ltd (the Applicant). The statement supports a planning application for the development of up to seven wind turbines at Mynydd Llanhilleth (“the Site), to east of Brynithel and Llanhilleth and west of Talywain, Pontypool. The Site boundary is approximately 300m from the eastern edge of Llanhilleth (Grid Reference: 323634, 201932).
- 1.1.2. The Site comprises a mix of semi-improved and unimproved grassland, with areas of shrub heath, crowberry, bilberry and bracken. It is crossed by multiple public footpaths (PRoWs) many of which cross the proposed access routes to the turbines and the proposed grid connection corridor. Part of the Site is within Mynydd Llanhilleth Common which is designated as Common Land. There is no built development within the Site. An overhead electricity transmission line supported by double pole pylons is located to the east of the Site, at which the development would connect into the grid.
- 1.1.3. The Site is mainly within the authority of Torfaen County Borough Council (TCBC), with the western part lying within the authority of Blaenau Gwent County Borough Council (BCGBC) (referred to as the Proposed Development from here on).
- 1.1.4. This statement should be read in conjunction with the accompanying Planning Statement, which sets out the planning policy context for the application, the Design and Access Statement, which explains the design rationale for the wind farm, and the Environmental Statement (ES) which sets out an assessment of the likely significant environmental effects of the Proposed Development.
- 1.1.5. This statement has been prepared in line with the recently updated Planning Policy Wales (PPW) Edition 12, which includes a requirement for a GIS to be submitted with all planning applications (paragraph 6.2.12). It has also been informed by the ‘Delivering High Quality Green Infrastructure in Wales’ briefing paper published by Building with Nature (BwN) (November 2023).

1.2 SUMMARY OF THE PROSPED DEVELOPMENT

- 1.2.1. The Proposed Development is to construct and operate a wind farm of up to seven turbines with a maximum height to blade tip of up to 180m and installed capacity of up to 34MW dependent on the final turbine choice. The Proposed Development will also include:
- substation and control building;
 - temporary construction compound, including temporary site offices;
 - crane pads at each turbine location;
 - turbine foundations, laydown and storage areas;
 - underground power cables linking the turbines and the on-site substation;
 - internal access tracks;
 - upgraded access from the B4246;

- a grid connection consisting of underground cables which will intersect with the existing National Grid (NG) overhead line network via a H to the east of the Site near 200m south of Rhiw Franc Farm to the west of Pontnewynydd; and
- other construction enabling works.

1.2.2. Further information in relation to the Proposed Development and its objectives can be found within Chapter 4: Description of the Proposed Development of the ES, the accompanying Planning Statement, and the Design and Access Statement.

1.3 PURPOSE AND STRUCTURE OF THE REPORT

1.3.1. GI is the network of natural and semi-natural features, green spaces, rivers and lakes that intersperses and connects 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.

1.3.2. This statement describes how GI has been incorporated into the design of the proposal and how the step-wise approach has been applied. It seeks to demonstrate the multi-functional benefits and sustainable management of natural resources that the Proposed Development can provide. An assessment is included within the statement which utilises the BwN standards. As set out within PPW (paragraph 6.2.14) these standards represent good practice.

1.3.3. The statement is structured as follows:

- **Section 1: Introduction** – The introduction provides an overview of the scheme, sets out the purpose of the statement and explains the methodology that has been utilised;
- **Section 2: Summary of the Proposed Development** – Sets out an overview of the Proposed Development and site location;
- **Section 3: Context** – Sets out the relevant local, national and regional policy and guidance;
- **Section 4: Scheme Strategy** – Explains the objectives and design strategy for the scheme, and sets out the GI opportunities across the proposed scheme;
- **Section 5: Green Infrastructure Assessment** – Uses the Building with Nature Standards Framework to assess the scheme; and
- **Section 6: Conclusion** - Reaches conclusions on the overall provision and design of Green Infrastructure.

1.4 APPROACH TO DEVELOPING THE GREEN INFRASTRUCTURE STATEMENT

1.4.1. This statement follows PPW and Natural Resource Wales (NRW) guidance on how to integrate and assess GI as part of the Proposed Development. The following explains the GI assessment methodology:

- 1. Policy and guidance context: whilst Torfaen has a Green Infrastructure Strategy (dated 2024) and an Assessment (2021), BCGBC does not. As a result a thorough review of national, regional and local policy has been carried out in order to ensure that the Proposed Development incorporates best practice and GI priorities;

- 2. Green infrastructure assets: Contextual existing GI data sets from NRW's Data Map Wales / LandMap have informed the GI baseline of the proposals;
- 3. Scheme development: The Proposed Development seeks to respond to the BCGBC and TCBC aspirations through a number of key objectives and design principles;
- 4. GI assessment: The BwN Standards Framework 2.0 has been used to assess the proposed GI. The twelve standards shown at **Figure 1-1** provide a pathway for and recognition of early and sustained engagement in the design, implementation and long-term stewardship of high-quality GI. They focus on opportunities to put existing and planned-for habitat and wildlife at the centre of development. Each standard is defined by its purpose and key characteristics, which are presented in the form of questions. Within the assessment, the questions are used to advise how the design meets each of the Standards. Please note that the Proposed Development is not pursuing official BwN Accreditation, the BwN Standards Framework has been used as good practice to assess the GI priorities and opportunities.

Figure 1-1 - Building with Nature Standards

Building with Nature Overview	
Introduction	
How Building with Nature Accreditation works	
Scope of Building with Nature - What can it assess and when should it be used?	
Introduction to the Building with Nature Standards	
CORE Standards	
Standard 1	Optimises Multifunctionality and Connectivity
Standard 2	Positively Responds to the Climate Emergency
Standard 3	Maximises Environmental Net Gains
Standard 4	Champions a Context Driven Approach
Standard 5	Creates Distinctive Places
Standard 6	Secures Effective Place-keeping
WELLBEING Standards	
Standard 7	Brings Nature Closer to People
Standard 8	Supports Equitable and Inclusive Places
WATER Standards	
Standard 9	Delivers Climate Resilient Water Management
Standard 10	Brings Water Closer to People
WILDLIFE Standards	
Standard 11	Delivers Wildlife Enhancement
Standard 12	Underpins Nature's Recovery

2 SUMMARY OF THE PROPOSED DEVELOPMENT

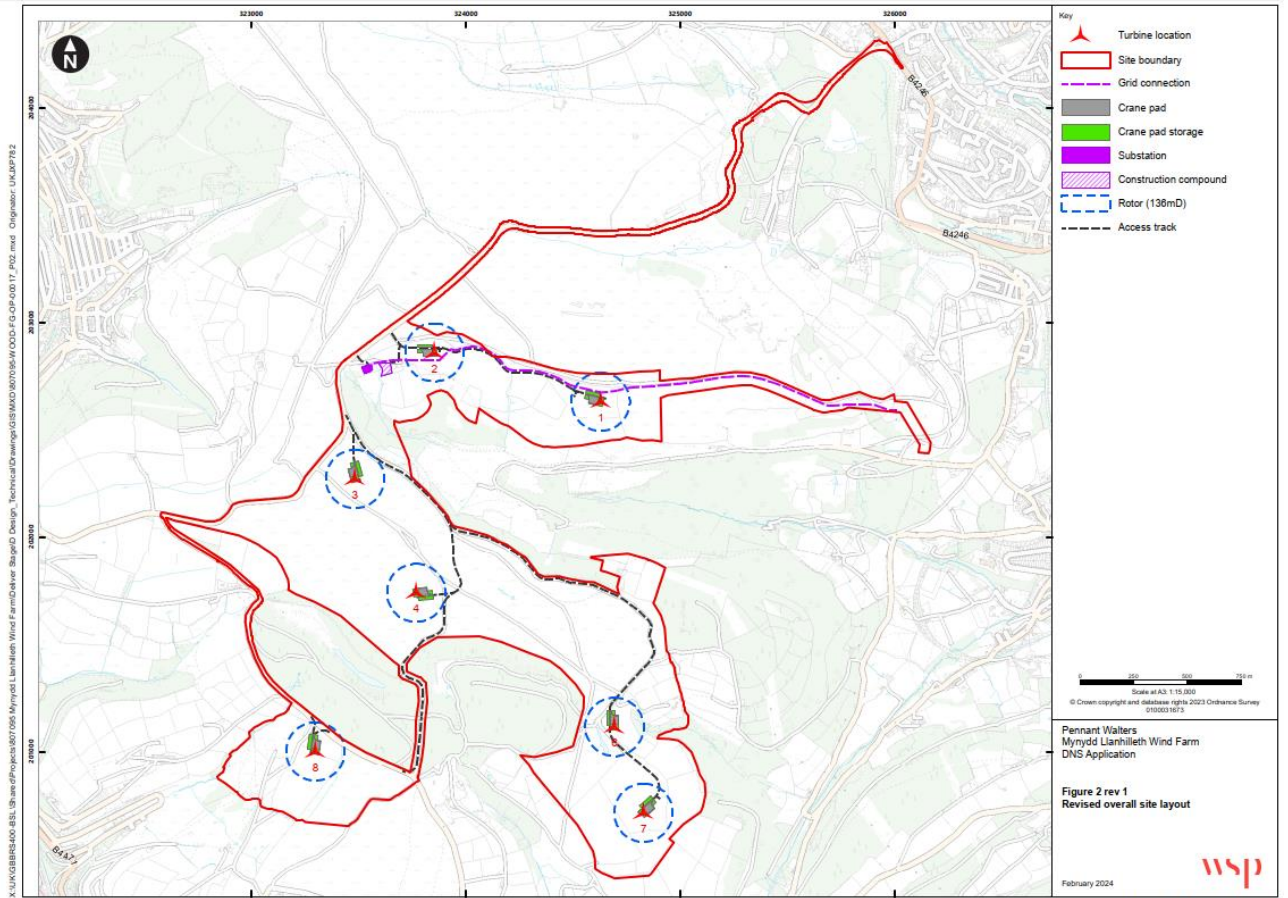
2.1 THE LOCATION OF THE PROPOSED MYNYDD LLANHILLETH WIND FARM

- 2.1.1. The Proposed Development would be located on the summit and upper slopes of Mynydd Llanhilleth between Afon Valley to the east and the Ebbw Fach Valley to the west.
- 2.1.2. The majority of the land comprises a mix of semi-improved and unimproved grassland, with areas of shrub heath, crowberry, bilberry and bracken.
- 2.1.3. It is crossed by multiple public footpaths (PRoWs) many of which cross the proposed access route to the turbines and the proposed grid connection corridor. Part of the Site is within Mynydd Llanhilleth Common which is designated as Common Land. There is no built development within the Site. An overhead electricity transmission line supported by double pole pylons is located to the east of the site.
- 2.1.4. The Site boundary is approximately 300m from the eastern edge of Llanhilleth (Grid Reference: 323634, 201932). The site is mainly within the authority of TCBC, with the western part lying within the authority of BCGBC (referred to as the Proposed Development from here on).

2.2 THE PROPOSED DEVELOPMENT

- 2.2.1. The Proposed Development is to construct and operate a wind farm of up to seven turbines with a maximum height to blade tip of up to 180m and associated infrastructure including a substation, underground cabling, access tracks, substation and control building.
- 2.2.2. The wind farm will be designed with an operational life of 30 years. At the end of this period the Applicant has three options; apply for continuation of existing wind turbines; to repower the site using new turbines; or for decommissioning and reinstatement of the site. For the purposes of this assessment, it is assumed that the wind farm will be decommissioned.
- 2.2.3. The Proposed Development will also include:
- substation and control building;
 - temporary construction compound, including temporary site offices;
 - crane pads at each turbine location;
 - turbine foundations, laydown and storage areas;
 - underground power cables linking the turbines and the on-site substation;
 - internal access tracks;
 - upgraded access from the B4246;
 - a grid connection consisting of underground cables which will intersect with the existing NG overhead line network via a H to the east of the Site near 200m south of Rhiw Franc Farm to the west of Pontnewynydd; and
 - other construction enabling works.
- 2.2.4. The layout of the site is shown in **Figure 2-1** below.

Figure 2-1 - Site Layout



3 CONTEXT

3.1 POLICY AND GUIDANCE

3.1.1. Relevant national, regional and local planning policy and guidance has been summarised below. Further details of all of the applicable policy is set out within the Planning Statement, which should be read alongside this document.

NATIONAL POLICY WALES (FEBRUARY 2024)

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

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

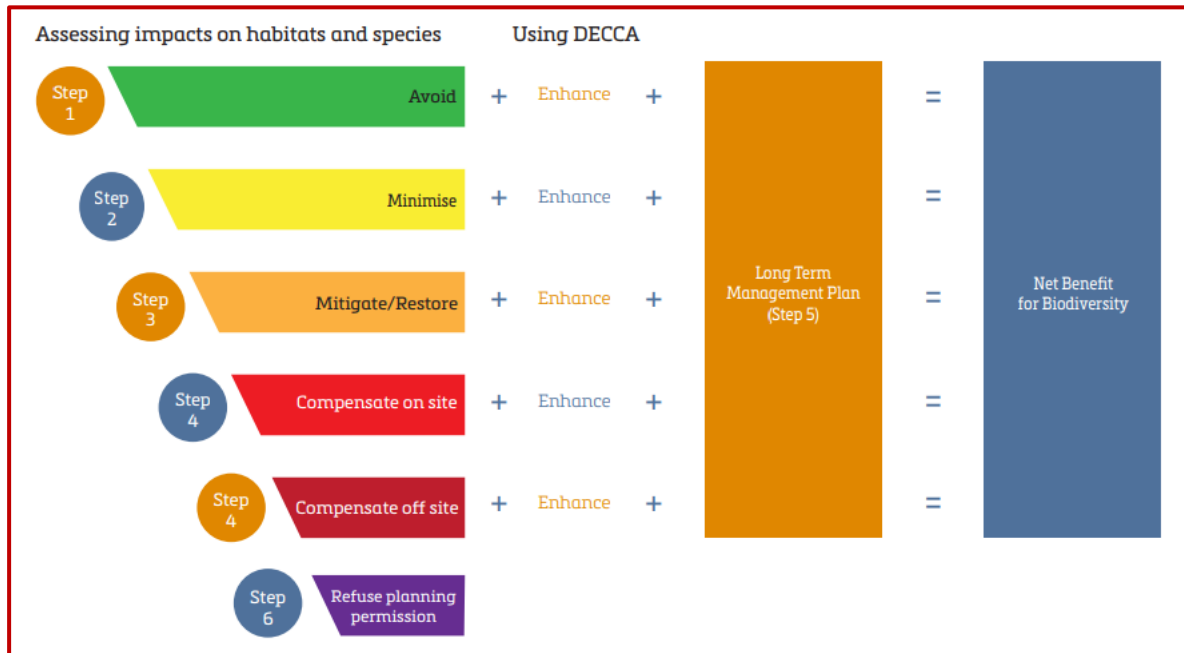
3.1.4. In February 2024, an updated PPW was published. The main changes were in relation to GI, securing net benefit for biodiversity, strengthening protection of Sites of Special Scientific Interest (SSSI) and promoting new tree planting. Further information in relation to these changes are provided below:

- Green Infrastructure – text around GI assessments was strengthened, with additional responsibilities on Local Planning Authorities to adopt a strategic and proactive approach to GI. Paragraph 6.2.12 of PPW12 states that a proportionate GI Statement should be submitted with all planning applications. This should highlight any baseline data considered and surveys and assessments undertaken, including habitats and species surveys, arboricultural surveys, sustainable drainage statements, landscape and ecological management plans, open space assessments and green space provision and active travel links.
- Net Benefit for Biodiversity and the Step-wise Approach – PPW12 sets out a requirement for development to provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems, through the application of the step-wise approach. It states the need to consider enhancement and long-term management at each step. Paragraph 6.4.14 confirms that this can be secured through attaching planning conditions and/or other obligations to a planning permission. The use of GIS as a means of demonstrating the step-wise approach is explicit. A diagram which provides a summary of the step-wise approach using DECCA is set out at Figure 12 of PPW12 and has been included at **Figure 3-1**.
- Protection for SSSIs – PPW12 strengthens the protection given to SSSI's, and states that development in a SSSI must be avoided, unless it is necessary for the management of the site. There is also a presumption against development not within an SSSI, but likely to damage a SSSI. Paragraph 6.4.27 advises that development will only be acceptable in wholly exceptional circumstances and where it is considered appropriate, is not likely to damage the SSSI and there is broad and clear agreement for mitigation and enhancement as part of a development.

- Trees and Woodland – additional text has been included relating to trees, woodlands and hedgerows and in particular the compensation that should be provided for any losses. Paragraph 6.4.42 states that planning authorities must first follow the step-wise approach where trees and hedgerows are removed as part of a proposed scheme. Where loss is unavoidable compensation will be required through replacement planting.

3.1.5. PPW 12 also refers to common land at paragraph 6.3.18. It makes clear that access to it should not be prevented or impeded unnecessarily.

Figure 3-1 - Summary of Step-Wise Approach



Source: PPW 12

FUTURE WALES – THE NATIONAL PLAN 2040 (FEBRUARY 2021)

- 3.1.6. Future Wales is the 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 communities
- 3.1.7. Policy 9 ‘Resilient Ecological Networks and Green Infrastructure’ is considered to be of particular relevance to this statement. This policy seeks to ensure that “*action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature based approaches to site planning and the design of the built environment*”.

NATURE CONSERVATION AND PLANNING TECHNICAL ADVISORY NOTE (TAN) (SEPTEMBER 2009)

- 3.1.8. The Nature Conservation and Planning TAN provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.
- 3.1.9. In terms of GI, it states that development policies and supplementary planning guidance should promote opportunities for the incorporation of wildlife and geological features within the design of the development.
- 3.1.10. This TAN sets out the key principles of planning for nature conservation, provides advice about the preparation and review of development plans, including the relevant statutory requirements, and addresses nature conservation in development control procedures.
- 3.1.11. It also deals with the conservation of internally, nationally and locally designated sites and habitats and also the conservation of protected and priority species.

REGIONAL PLANNING POLICY

- 3.1.12. There are no relevant policy documents at the regional level. The South East Wales Area Statement outlines a landscape scale approach to address the increasingly complex and widespread environmental, social and political challenges that transcend traditional management boundaries. It covers the local authorities of Blaenau Gwent, Caerphilly, Monmouthshire, Newport and Torfaen. The Statement does not have policy status but provides guidance which can be considered relevant to GI.
- 3.1.13. The statement is subdivided into the themes of 'Linking our Landscapes', 'Climate Ready Gwent', 'Healthy Active Connected', and 'Ways of Working'.
- 3.1.14. The 'Linking our Landscapes' theme is about identifying local opportunities for protected sites, and natural and built environments to contribute towards the resilience of wider priority habitat networks in the region. 'Climate Ready Gwent' is about identifying landscape and regional scale opportunities and collective interventions for climate adaptation and mitigation which enhances local ecosystem and community resilience. 'Healthy Active Connected' is about interventions that protect and improve health and wellbeing, and 'Ways of Working' seeks to identify the benefits of strategic regional collaboration to maximise local delivery.

LOCAL PLANNING POLICY

Torfaen County Borough Council

- 3.1.15. TCBC adopted its LDP in December 2013 which sets policies to guide development up to 2021. The policies of greatest relevance to this statement are set out in **Table 3-1**.

Table 3-1 - Torfaen County Borough Local Plan Policies up to 2021

Adopted Local Plan Policy	Policy Summary
S3 Climate Change	The policy seeks to mitigate the causes of further climate change and adapt to the current and future effects of climate changes. It includes (at criteria d) utilising renewable and low or zero carbon energy technologies to generate heat and electricity requirements.

Adopted Local Plan Policy	Policy Summary
S7 Conservation of the Natural and Historic Environment	Seeks to ensure that development proposals ensure the conservation and enhancement of the Natural, Built & Historic Environment of Torfaen, in particular a) Biodiversity resources; b) Geodiversity resources; c) Water environment; d) Landscape setting; e) Character of the built environment; and f) Historic assets.

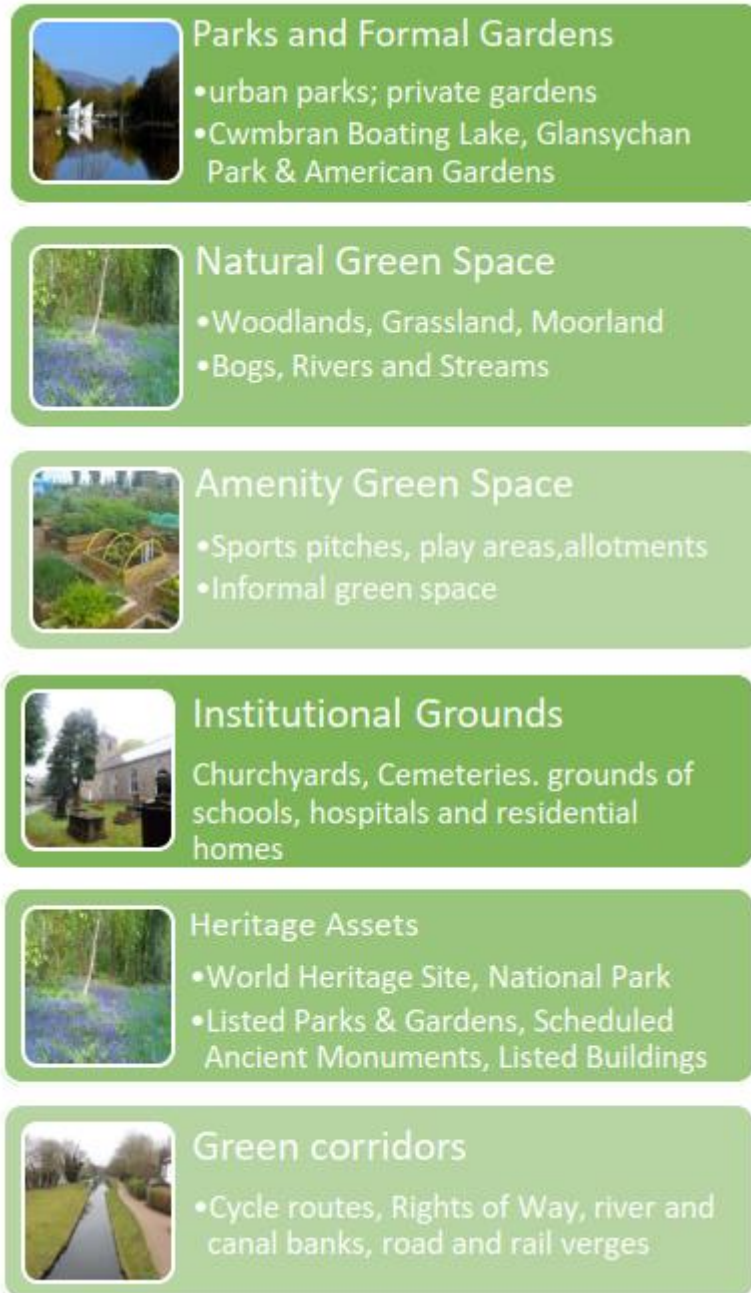
Torfaen Green Infrastructure Supplementary Planning Guidance (Feb 2024)

- 3.1.16. The Green Infrastructure SPG was adopted in February 2024. It provides guidance to the interpretation and implementation of adopted Local Development Plan (LDP) Strategic Policies S3 (Climate Change) and S7 (Conservation of the Natural and Historic Environment). It explains that *“a Green Infrastructure Statement should be submitted with all planning applications, and “should set out how the Step Wise approach has been applied, any survey data / site assessment results, and how green infrastructure has been incorporated into the proposal”.*
- 3.1.17. It sets out a vision for Green Infrastructure and identifies the following key objectives to *“deliver a functional, connected network of natural areas that will support the current and future well-being needs of local populations in Torfaen”:*
1. Build climate change resilience;
 2. Support biodiversity and ecological resilience;
 3. Tackle landscape crime and irresponsible use of greenspaces;
 4. Develop active travel networks and promote outdoor physical activity; and
 5. Promote training, volunteering and apprenticeship opportunities.
- 3.1.18. This GI strategy, and in particular the key objectives, have been considered as part of this GI Statement and the Proposed Development.

Torfaen Green Infrastructure Assessment (GIA) (Adopted December 2021)

- 3.1.19. The Torfaen Green Infrastructure Assessment (GIA) was adopted in December 2021. It explains that PPW11 *“requires planning authorities to prepare a Green Infrastructure Assessment (GIA) to guide and shape the planning and delivery of green infrastructure within Torfaen”.*
- 3.1.20. It quotes that Green infrastructure is defined in PPW11 as *“the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places”.*
- 3.1.21. The GIA goes on to emphasise that *“Green infrastructure can function at a range of different scales; from entire ecosystems such as wetlands and rivers to parks, fields and gardens. Street trees, hedgerows, roadside verges, and green roofs / walls can all contribute to green infrastructure networks. These features are termed Green Infrastructure Assets and have a role to play in supporting biodiversity and delivering health, social, economic and cultural benefits”.* It provides examples of green infrastructure Assets as per **Figure 3-2** below.

Figure 3-2 - Examples of Green Infrastructure Assets



Source: Torfaen Green Infrastructure Assessment (GIA)

3.1.22. It explains that Green Assets perform various functions, and that the “*functions are also termed ‘ecosystem services’*”. Examples of Ecosystem Functions are shown in **Figure 3-3** below.

Figure 3-3 - Examples of Ecosystem Functions

ENVIRONMENTAL	SOCIAL	ECONOMIC	CULTURAL
Shading from the sun	Green travel route	Food production	Heritage asset
Evaporative Cooling	Aesthetic	Fuel production	Cultural asset
Shelter from wind	Learning	Timber production	
Habitat for wildlife	Recreation	Green jobs	
Wildlife corridor		Setting for development	
Soil stabilisation		Supporting image	
Water storage			
Water interception			
Water infiltration			
Flow reduction due to surface roughness			
Carbon storage			
Carbon sequestration			
Pollination resource			
Noise absorption			
Trapping pollutants			

Source: Torfaen Green Infrastructure Assessment (GIA)

Blaenau Gwent County Borough Council

- 3.1.23. The current Local Development Plan (LDP) was adopted on 23 November 2010. It provides a framework for local decision-making and sets out the Councils land use policies and proposals to control development in the county borough up to 2021.
- 3.1.24. The policies of greatest relevance to this statement are set out in **Table 3-2**.

Table 3-2 - Blaenau Gwent County Borough Local Development Plan Policies up to 2021

Adopted Local Plan Policy	Policy Summary
SP9 Active and Health Communities	This policy promotes the delivery of active and healthy communities including protecting and enhancing accessibility to natural greenspaces.
SP10 Protection and Enhancement of the Natural Environment	Seeks to protect and, where possible, enhance natural environment and provides criteria through which this will be achieved within Blaenau Gwent related landscapes, green infrastructure, biodiversity and nature conservation.
DM16 Trees, Woodland and Hedgerow Protection	Requires that development proposals not give rise to unacceptable harm to trees, woodlands and hedgerows that have natural heritage value or contribute to the character or amenity of a particular locality.

Adopted Local Plan Policy	Policy Summary
ENV2 Special Landscape Areas	Lists the eight SLAs that have been identified within the area administered by Blaenau Gwent County Borough Council using a regionally agreed methodology. Development within the defined SLAs will be expected to conform to the highest standards of design, siting, layout and materials appropriate to the character of the area.

3.1.25. BGCBC does not have a GI Strategy or GI Statement.

3.2 GREEN INFRASTRUCTURE ASSETS

3.2.1. PPW12 (paragraph 6.12.13) states that GI statements should highlight any baseline data considered and surveys and assessments undertaken. The baseline biodiversity conditions are described in ES **Chapter 8: Biodiversity**. Additionally, with regards to ornithology the baseline conditions are described in ES **Chapter 9: Ornithology**. These were informed by the following:

- Desk study - this involved collating information from both statutory and non-statutory bodes in 2020 and 2022;
- Extended Phase 1 survey of the Site in April 2020;
- Extended Phase 1 survey of the proposed access route in July 2022;
- Extended Phase 1 survey of the proposed grid connection corridor in August 2022;
- Detailed botanical surveys of the Site in May 2020, June 2021 and May 2022;
- Bat roost and activity surveys in 2021, 2022 and 2023;
- Badger surveys in 2020;
- Dormouse surveys 2020 and 2021;
- Otter and water vole surveys in 2020;
- Great crested newt surveys comprising Habitat Suitability in 2020 and 2021; and environmental DNA (eDNA) surveys 2021;
- Invertebrate surveys in 2021; and
- Tree Survey compliant with BS 5837:2012 undertaken in 2024.

3.2.2. In terms of ornithology, the baseline was informed by the following

- Desk Study examining ornithology in 2020 and 2022;
- Vantage point surveys from 2020 to 2022;
- Moorland and breeding bird surveys in 2020 and 2021;
- Breeding raptor surveys in 2020 and 2021;
- Nightjar and owl surveys in 2020, 2021 and 2022;
- Winter transect Surveys in 2020 and 2022;
- Winter transect surveys 2020 to 2022;

- Waterbody Point Counts in 2021 and 2022;
- Hen Harrier Roost Surveys 2021; and
- Barn owl surveys in 2021 and 2022.

3.2.3. In addition to the ecological aspects of the Proposed Development, consideration has been given to historic environment impacts (**ES Chapter 7: Historic Environment**) and landscape impacts (**ES Chapter 6: LVIA**), with extensive surveys undertaken and embedded measures included to reduce impacts. Consideration has been given to sustainable drainage with detailed drainage design to be delivered in accordance with the Drainage Strategy (included within the Flood Consequence Assessment (**Appendix 10A**)). Additionally, consideration has been given to public access and recreation (**ES Chapter 16: Socio-economics**).

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

SITE AND SURROUNDINGS

3.2.5. The Proposed Development would be located on the summit and upper slopes of Mynydd Llanhilleth between Afon Valley to the east and the Ebbw Fach Valley to the west. The Site boundary is approximately 300m from the eastern edge of Llanhilleth (Grid Reference: 323634, 201932). The village of Brynithel is located approximately 500m to the south west of the Site at its closest point at Blaencuffin Road.

NATIONAL LANDSCAPE CHARACTER

3.2.6. The Proposed Development Site is located within NRW's National Landscape Character Areas (NLCA) 37: South Wales Valleys . This covers an extensive upland area dissected by deep, urbanised valleys. The key characteristics of this NLCA are as follows:

- "Extensive Upland plateaux - typically wild and windswept, often with unenclosed tracts, running roughly north-south as 'fingers' parallel between intervening deep valleys.
- Numerous steep-sided valleys - typically aligned in parallel, flowing in southerly directions, shaped by southward flowing glaciers, leaving behind distinctive corrie ('cwm') and crag features. Major rivers include the Tawe, Taff and Rhymney.
- Ribbon urban and industrial areas in valleys - in places extending up valley sides and to valley heads. The area is sometimes regarded as being part of a 'city region'. Middle and eastern valleys tend to be the most heavily and continuously developed, e.g., Rhondda Valley. The uplands by comparison have little or no settlement.
- Extensive remains of heavy industry - with a mix of derelict, preserved and largely redeveloped areas, notably for coal mining. Preserved as heritage (World heritage Site) at Blaenafon this typically includes old railway alignments, buildings and former tips.
- Contrast of urban valley activity next to quiet uplands - e.g., busy roads, new developments, traffic noise, night lighting, versus the adjacent wilder, remoter, quieter uplands.
- Large blocks of coniferous plantation and deciduous woodland fringes - covering many steep hillsides and hilltops, most notably in the middle to western portion of the area, providing a softer contemporary landscape where there was once industry.

- Heather, rough grassland and steep bracken slopes - dominate many plateaux and are grazed mainly by sheep. Much is common land.
- Improved pastures on some lower valley sides - grazed by sheep and some dairy cattle.
- Field boundaries - dry stone walls mark the boundary of common land while fields on lower slopes are bounded by dense hawthorn hedges, interspersed with swathes of broadleaved woodland.
- Transport routes restricted to valleys - the intervening topography makes valley to valley travel difficult, except at heads and bottoms of valleys. Occasionally there are roads that climb steeply over passes with dramatic views and 'hair pin' bends.
- Iconic cultural identity - many popular images of a tough, rugby-playing, religious, radically-minded society still remain associated with the South Wales Valleys, however today's post-industrial, internet-connected reality is somewhat different."

LANDMAP

- 3.2.7. LANDMAP is an all-Wales landscape resource where landscape characteristics, qualities and influences on the landscape are recorded and evaluated in a nationally consistent data set. The five LANDMAP spatial datasets are called the Geological Landscape, Landscape Habitats, Visual and Sensory, Historic Landscape and Cultural Landscape.
- 3.2.8. An assessment of the effects of the Proposed Development on LANDMAP Aspect Areas is set out in Table 6.29 (Summary of Significance of Effects) of **ES Chapter 6: Landscape and Visual Impact Assessment**. The selection of LANDMAP Aspect Areas included in the LVIA has been carried out in accordance with the methodology provided in Using LANDMAP in Landscape and Visual Impact Assessments.
- 3.2.9. The Site is not within any national landscape designations. The Site is within or adjacent to three 'host' Special Landscape Areas (SLA). There are also a number of SLAs within proximity of the Site. Figures 6.16 and 6.15 of the ES shows the national and local landscape designations in relation to the Site.

BIODIVERSITY

- 3.2.10. No part of the Site is covered by any statutory designations. However, there are a number of such designations within the Site's potential Zone of Influence (Zoi) of the application, which are listed in Table 8.6 of **ES Chapter 8: Biodiversity**, along with their key attributes.
- 3.2.11. With regards to arboriculture, Appendix 8C of the ES set out the baseline for the turbines and access route, which has been informed by a BS 5837:2012 Trees in Relation to Design, Demolition and Construction compliant survey of trees.
- 3.2.12. Appendix 8C of the ES sets out the results of the tree survey carried out in relation to the Proposed Development. 95 individual trees, 24 groups of trees, and two woodlands were identified. Overall, the items identified were considered to be of high to moderate arboricultural quality, with the exception of 16 category C items. The tree survey also identified the presence of Ancient Woodlands, which are part of a larger area of Plantation on Ancient Wood Sites (PAWS) within the surveyed area.

- 3.2.13. In terms of the access road, the Arboricultural Impact Assessment (Access Route) dated April 2024 confirms the proposed improvement works to the access route will result in the loss of seven category B items, four category C items and one category U item. It has also resulted in the partial loss of two category B items and eight category C items. Replacement planting will be onsite and at a minimum ratio of three trees of a similar type and compensatory size for every one lost. The majority of replacement woodland planting is proposed along the access route and individual trees are proposed along appropriate field boundaries where such treatment is consistent with the existing landscape character. Proposed compensatory planting plan is included within EDP's Biodiversity Clarification Note (April 2024, report reference EDP6367_r038b at Annex EDP 4).
- 3.2.14. The **ES Chapter 8: Biodiversity** sets out an assessment of likely effects on tree and hedgerow habitats and identifies likely mitigation, compensation or management requirements. ES Chapter 9 (Ornithology) sets out an assessment of effects on birds.

HISTORIC ENVIRONMENT

- 3.2.15. There are no designated historic assets located within the Site boundary.
- 3.2.16. Within 1km there are three Grade II listed buildings, one Grade II* Registered Park and Garden, two scheduled monuments.
- 3.2.17. There are no World Heritage Sites, Landscapes of Historic Interest or Conservation Areas within 1km of the site.
- 3.2.18. There are multiple non-designated assets within 1km of the site. These are listed in Table 7.7 of **ES Chapter 7: Historic Environment**.
- 3.2.19. In terms of archaeology, an assessment of the available data had concluded that the general archaeological potential from the Palaeoenvironmental to Roman period is low. The agricultural landscape at the margins of the Site may have originated in the medieval period as farmsteads utilising the upland edge, probably following a pattern of seasonal transhumance. The potential for medieval archaeology to be present is considered to be high. For the Post-medieval and Modern period, there is a high likelihood that the Site contains buried remains related to these eras such as boundary or drainage ditches or previously unrecorded, buried remains related to coal mining. However, such remains would be of very low sensitivity.
- 3.2.20. There are several historic assets subject to potential effects from the development, arising from changes to setting. These are set out in the overall baseline of Chapter 7 of the ES (Historic Environment) and include Scheduled Monuments, Listed Buildings and Conservation Areas. An assessment of the effect of the proposals on these assets is set out within the Chapter.

WATER ENVIRONMENT

- 3.2.21. The Proposed Development is located primarily on a broad ridge which runs roughly in a north-south direction and leads to Coity Mountain approximately 5km to the north at an elevation of 578mAOD. The majority of the Wind Farm Development Area sits at elevations between 350mAOD and 450mAOD across the ridge summit, and the proposed access track via Farm Road descends to an elevation of approximately 250mAOD at the junction to the B4246.
- 3.2.22. The Proposed Development area is intersected by the headwaters of several tributaries of the Afon Ebwy Fach, Afon Ebwy and Afon Lwyd which are classified as Ordinary Watercourses. The headwaters of the Nant Cwmllydrew, Nant Cyffin and Nant y Cnyw intersect the west and

southwest boundary of the Proposed Development area and drain south into the Afon Ebwy. The headwaters of the Nant Ffwydd-oe, Nant Caws and Nant Ddu intersect the southeast limits of the Proposed Development area and drain east into the Afon Lwyd catchment

- 3.2.23. Within the wider Study Area, the Nant y Groes drains west into the Afon Ebwy Fach, the headwaters of which are situated approximately 600m northwest of the Proposed Development Area. However, the associated catchment does not intersect the Proposed Development Area and therefore there is deemed to be no hydraulic connectivity (via surface water) to this watercourse.
- 3.2.24. Additional watercourses within the Study Area include Nant Ffrwd (north), Trostant Brook (south), Nant y Maelor (east), and the Cwm Llwynau (southwest), all of which are deemed to have no hydrological connectivity to the Proposed Development area.
- 3.2.25. A FCA has been prepared and is included as **Appendix 10A** to the ES. With regard to fluvial and tidal flood risk, on the basis of the Flood Zone classification and elevation of the Proposed Development, the assessed risk of fluvial flooding is considered to be low. Similarly, the locality is not determined to be at risk of tidal flooding, due to the elevation above sea level.
- 3.2.26. NRW's FMfP for Surface Water and Small Watercourses indicates that the majority of the Proposed Development (and wider study area) is at very low risk of flooding (Flood Zone 1, <0.1% AEP) from surface water.
- 3.2.27. Further information can be found in **ES Chapter 10: Water Environment**

4 SCHEME STRATEGY

4.1 OBJECTIVE AND DESIGN STRATEGY

4.1.1. Underpinning the design of the Proposed Development is the intention to provide a wind farm that will provide a source of renewable energy to support the energy needs of Wales, without having significant effects on the environment. This means that the Proposed Development has been located and designed to:

- ensure carbon emissions are reduced;
- provide the most appropriate locations for wind turbines to ensure that the maximum amount of wind energy can be utilised from the site;
- ensure that visual impacts on the surrounding area are minimised;
- ensure that the public access to the site is maintained, in a safe manner; and
- ensure the residential and environmental amenity of features in and around the site are protected.

THE PROPOSED DEVELOPMENT

4.1.2. The Proposed Development is to construct and operate a wind farm of up to seven turbines with a maximum height to blade tip of up to 180m. **Table 4-1** provides the grid references for each turbine.

Table 4-1 - Proposed turbine locations

Turbine ID	Easting	Northing
1	324630	202630
2	323855	202860
3	323485	202270
4	323770	201740
5	-	-
6	324695	201115
7	324830	200715
8	323300	201000

4.1.3. The application also comprises associated infrastructure including access improvements, new and improved internal wind farm tracks, crane pads, temporary construction compound, laydown and storage areas and grid connection infrastructure, including an on-site substation.

4.1.4. The wind farm will be designed with an operational life of 30 years. At the end of this period the Applicant has three options; to decommission the wind farm and dismantle and remove the turbines; to apply for an extension to the operating period using existing equipment; or apply to install new

equipment on the site. For the purposes of the ES assessment, it is assumed that the wind farm would be decommissioned.

- 4.1.5. The layout of the Proposed Development has been chosen because it balances high productivity with the environmental sensitivities present at the Site.
- 4.1.6. Further information in relation to the design evolution of the proposed development is provided in the ES and Design and Access Statement which accompanies the application.

EMBEDDED ENVIRONMENTAL MEASURES

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

Biodiversity

- A Construction Environmental Management Plan (CEMP) supports the application and will be implemented during the entirety of the construction stage to ensure that construction activities for the Proposed Development are carried out in accordance with legislation and best practice for minimising the effects of construction on the environment and local communities. The CEMP can be secured by way of a suitably worded pre-commencement planning condition attached to the planning permission. An Outline CEMP forms part of the ES.
- An Ecological Construction Method Statement (ECMS) will be prepared which will set out in detail the measures to be implemented to protect Important Ecological Features (IEFs) during the construction phase of the Proposed Development. It is proposed that the methodologies prescribed within the ECMS will be overseen by an appointed Ecological Clerk of Works (ECoW), whose scope and remit will be set out within the ECMS. The ECMS will also clearly identify the responsibilities of key personnel including the Site manager(s) and ECoW. This document will also cross reference with the CEMP, where relevant. The ECMS and appointment of the ECoW can be secured by way of a suitably worded pre-commencement planning condition attached to the planning permission.
- An outline Landscape and Ecological Management Plan (LEMP) will be produced to support the submission and will ensure the appropriate management and maintenance of all retained and newly created habitats/features proposed over the lifetime of the development. The outline LEMP will provide a management framework for the conservation of site ecology within the site during the construction and post-construction phases of the Proposed Development. In particular, it will detail the management recommendations for features of ecological interest located within certain parts of the development footprint including habitat features to be retained, enhanced and created. The LEMP can be secured by way of a suitably worded pre-commencement planning condition attached to the planning permission.
- A detailed Collision Mitigation Monitoring Strategy (CMMS) will be prepared, which will set out in detail the measures to be implemented to reduce the impacts on bats from killing due to barotrauma. The CMMS will set out the detailed mitigation measures to be employed, including feathering of the blade, curtailment for specific turbines at specific times of year (e.g., curtailing during the autumn months when there are peaks in bat activity from high collision risk species) and/or during specific weather conditions (e.g., during warm nights with little wind, which are

considered favourable conditions for bats). Monitoring details will also be set out, to include the level and duration of monitoring required (such as acoustic monitoring and carcass searches). The CMMS can be secured by way of a suitably worded pre-commencement planning condition attached to the planning permission.

- Locally designated sites and habitats - Habitats that are subject to temporary loss to be reinstated at the earliest opportunity and enhanced where possible. Habitats that are permanently lost to be offset through habitat creation and enhancements to retained habitats within the wider Site. Protective fencing to be installed around retained habitat features as necessary. Construction to be implemented in accordance with pollution prevention guidelines.
- Commuting, foraging and roosting bats - Turbines sited away from nearby roosts. Micro-siting of turbines as far as possible to minimise tree loss and impacts to Root Protection Areas (RPAs). Pre-commencement checks of trees with bat potential in vicinity of turbines to confirm continued absence of roosts. Implementation of mitigation measures prior to felling of trees with confirmed bat roost potential (or in accordance with an NRW EPS Development Licence where bat roosts are confirmed). Habitats that are permanently lost to be offset through habitat creation and enhancements to retained habitats within the wider Site. In respect of local bat populations utilising the Site, construction works to be carried out during daylight hours, ideally over winter when bats will be in hibernation, and/or implementation of a sensitive lighting regime should works need to be carried out at night. To be secured through ECMS / CEMP.
- Common reptiles - Suitable reptile habitat to be subject to a habitat manipulation exercise prior to construction works commencing. Any reptiles found to be moved to retained habitats away from the working corridors, to prevent killing or injury. The construction areas to be retained as unsuitable habitat for the duration of the construction works.
- Commuting and foraging bats (operation) - A bat buffer zone comprising a minimum 50m stand-off from turbine blade tip to be maintained in respect of existing bat habitat and new tree planting. Feathering of blades will also apply during as well as curtailment during bat sensitive periods (e.g., at certain times of year, between sunset and sunrise, and/or during good weather conditions when bats are active).
- Roosting bats (operation) - Pre-commencement checks of trees with bat potential in vicinity of turbines to confirm continued absence of roosts. Implementation of mitigation measures prior to felling of trees with confirmed bat roost potential (or in accordance with an NRW EPS Development Licence where bat roosts are confirmed).

4.2 ORNITHOLOGY

- All bird species - Construction methods and programme will consider the location of identified nest sites with the timing and duration of works managed to avoid direct conflict. Where works cannot be scheduled to avoid the main breeding season, additional measures such as the employment of protection zones around nest sites and visual screens/noise screens would be considered. The use of lighting around the proposed construction compound will be restricted. Secured by Construction Environmental Management Plan (CEMP) secured by DNS condition.
- Breeding bird assemblage - Proposals have sought to minimise habitat losses and only very small areas of woodland/scrub will be lost to facilitate access track upgrades. Measures to prevent impacts on breeding birds will be set out in the CEMP and include:

- Vegetation clearance outside of the breeding bird season (i.e., between September and February);
- Use of dedicated working areas and construction access routes;
- Ecological Clerk of Works (ECoW) to carry out pre works checks and monitoring of construction areas where they cannot be completed outside of the breeding bird season (March to August inclusive); and
- Any active bird nests in or immediately adjacent to working areas would be identified and provided with appropriate no working protection zones.
- Target species - The number of turbines and their positioning has been informed by ornithological sensitivities to minimise impacts. A strategy will be developed to monitor the number and frequency of collisions.
- All birds – The number of turbines and their positioning has been informed by ornithological sensitivities to minimise impacts. Birds will adapt to the surroundings. The outline LEMP will set out the long-term management and enhancement of habitats, for all wildlife, including birds.
- Breeding bird assemblage (operation) – maintenance methodology to be adopted via CMMS that ensures major maintenance works avoid the breeding season, where possible, and/or are completed sensitively where nest sites of Schedule 1 species are known. The outline LEMP will include ongoing long-term management measures to enhance wider opportunities for any disturbed or displaced birds.

WATER ENVIRONMENT

- Implementation of an appropriate Water Management Plan (WMP) for the construction phase of the Proposed Development, utilising SuDS principles, including collection, conveyance and attenuation/infiltration storage where suitable. Suitable temporary silt fencing, bunding and water quality measures (i.e., silt capture to maintain storage volume) will be included in the design of these works. Sufficient capacity will be provided on-site to hold runoff prior to discharge runoff to ground and/or any water discharge into watercourses is limited to greenfield rates. A water quality monitoring programme will be agreed with NRW and implemented prior, during and following construction to ensure that the measures taken to protect the water environment are effective.
- Detailed drainage design for the operational wind farm development, utilising SuDS principles including attenuation storage where necessary, to ensure sufficient capacity is available on Site to discharge runoff to ground and/or watercourses (discharge limited to greenfield rates). The detailed drainage design will be prepared in accordance with the outline Drainage Strategy for the operational wind farm development included in the FCA (**Appendix 10A of the ES**) secured by planning condition.

5 GREEN INFRASTRUCTURE ASSESSMENT

5.1 DEMONSTRATING STEP-WISE APPROACH

- 5.1.1. PPW12 (paragraph 6.2.12) states that the GIS must be used for demonstrating how the step-wise approach (illustrated in **Figure 3-1**) has been applied.
- 5.1.2. Full details of the approach to mitigation and enhancement is provided in ES Chapter 8: Biodiversity and ES Chapter 9: Ornithology and the various supporting documents which have been produced. A number of the proposed embedded environmental measures have also been summarised in Section 3 of this statement above.
- 5.1.3. The key aspects of the step-wise approach and a summary of the measures proposed for implementation in relation to the approach are set out in the outline LEMP and in **Table 5-1** below.

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

Assessing Impacts on Habitats and Species Through the Step-Wise Approach	Measures Proposed for Implementation
Step 1 – Avoid	<ul style="list-style-type: none"> ■ Sensitive siting of turbines and associated infrastructure combined with pre-commencement surveys and precautionary working measures during construction to avoid impacts upon: <ul style="list-style-type: none"> • International Designated Sites • Nationally Designated Sites • Locally Designated Sites; • Irreplicable habitats; • Peatland; • Confirmed bat roosts; • Habitat (trees, built structures and quarry faces) with potential to support bat roosts features with potential to support bat roosts. In particular, following the withdrawal of the original application, the removal of Turbine 5 reduces the effect predicted on bats and their supporting habitats. • Habitat features with potential to support other European Protected Species.
Step 2 – Minimise	<ul style="list-style-type: none"> ■ The sensitive siting of infrastructure required to facilitate the Proposed Development so as to enable the use of existing access points and roadways as far as possible. ■ Reduction in the total number of turbines originally proposed, initially reducing the Proposed Development to eight turbines (from 12 turbines originally proposed), taking into account the findings of the ongoing environmental assessments at the Site; ■ Sensitive siting of the turbines and associated infrastructure to minimise impacts to: <ul style="list-style-type: none"> • Locally Designated Sites overlapping with the Site; • Priority and notable habitats occurring onsite;

Assessing Impacts on Habitats and Species Through the Step-Wise Approach	Measures Proposed for Implementation
	<ul style="list-style-type: none"> • Habitat features within the vicinity of the Proposed Development with potential to support bats during the bat active and bat roost seasons; and • Habitat features within the vicinity of the Proposed Development with potential to support other legally protected and/or Priority Species. ■ Removal of one further turbine from the development proposals, turbine 5, resulting in the Proposed Development comprising seven turbines in total. Given the sensitive location of turbine 5, this will significantly reduce adverse impacts upon bats; ■ Undertake update assessments to determine the current status of IEFs occurring within the vicinity of the construction footprint prior to commencement where potentially impacted.
<p>Step 3 – Mitigate / Restore</p>	<ul style="list-style-type: none"> ■ Implementation of a CEMP during the construction stage to ensure appropriate management and operational systems are in place to avoid/minimise adverse pollution effects; ■ Implementation of an ECMS detailing measures to be implemented to protect important ecological features during the construction phase of the Proposed Development, overseen by the appointed ECoW; ■ Minor habitat losses required to facilitate development likely arising within locally designated sites or across the Site more generally will be mitigated for through reinstatement and/or enhancements to habitats otherwise retained; ■ Feathering of blades of all turbines to reduce rotation speeds below 2rpm while idling so as to minimise collision risk to species; ■ Curtailment of all turbines when wind speeds drop below 6.5m/s so as to raise the cut-in speed at which the turbine blades move/generate electricity to further minimise collision risk to species; and ■ Where necessary and informed through subsequent monitoring, curtailment to apply to specific turbines during times when bat species with a high vulnerability to collision risk (i.e. serotine, noctule and Nathusius' pipistrelle) are present and active, i.e. between sunset and sunrise during August, September and October when temperatures rise above 7°C and windspeeds drop below 6.5m/s.
<p>Step 4 – Compensate On Site</p>	<ul style="list-style-type: none"> ■ Replacement planting onsite will be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost. This will be at a minimum ratio of at least 3 trees of a similar type and

Assessing Impacts on Habitats and Species Through the Step-Wise Approach	Measures Proposed for Implementation
	<p>compensatory size planted for every 1 tree lost, or in respect of tree groups/woodland edges/shelterbelt areas, planting will be at a minimum of 1600 trees per hectare for broadleaves, and 2500 trees per hectare for conifers; and</p> <ul style="list-style-type: none"> ■ Compensatory planting locations will focus on existing tree'd boundaries (woodland edges, tree lines and hedgerows) and areas fit to support establishment and health, ensuring unconstrained long-term growth of new planting necessary to further strengthen the existing resource onsite.
Step 4 – Compensate Off Site	No offsite compensation has been included with all mitigation measures delivered within the footprint of the Proposed Development.
Step 5 – Long Term Management Plan and Additional Measures	<ul style="list-style-type: none"> ■ Implementation of a LEMP (excluding Common Land) to ensure the appropriate management and maintenance of all retained and newly created habitats/features proposed over the lifetime of the development. The LEMP will include the need for monitoring of biophysical changes to sensitive habitats including: terrestrial succession and scrub encroachment within retained, enhanced and newly created habitats; botanical monitoring of sensitive habitats retained, translocated and restored; the monitoring of new habitats/features installed/created across the Site; and any additional monitoring and remedial action required; and ■ Delivery of a Collision Mitigation Monitoring Strategy (CMMS) to reduce the impacts on bats, with details to include the feathering of blades, the implementation of a sensitive curtailment regime; the level and duration of monitoring required, and how the mitigation strategy can be adapted and tailored to the findings of the monitoring surveys

5.2 DECCA FRAMEWORK

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

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

- 5.2.2. Although the requirements for the GI Statement set out in PPW12 do not explicitly reference the DECCA Framework, the approaches described in ES Chapters 8 and 9 and supporting documentation and how they apply to the DECCA Framework are summarised below.

DIVERSITY

- 5.2.3. The step-wise approach has sought to avoid or if cannot be avoided, minimise, all impacts relating to biodiversity. Enhancement and mitigation will seek to enhance degraded habitats through reactive management and long-term restoration of retained habitats.

EXTENT

- 5.2.4. Steps to avoid loss of sensitive habitat have been included throughout the design phase included siting of infrastructure away from key habitats and making use of existing roads for proposed access routes. Habitat restoration and long-term management of the site through the outline LEMP will help to increase resilience of habitats.

CONDITION

- 5.2.5. The long-term management and monitoring of habitats and species associated with the Proposed Development will help to enhance the condition of habitats on site and increase diversity and therefore overall condition of the site. By securing and enhancing non-statutory designated habitats, it will help to safeguard the site in the long-term and drive improvements of condition which would be unlikely to occur in the absence of the Proposed Development.

CONNECTIVITY

- 5.2.6. Measures to enhance the site will increase potential connectivity between the site and adjacent habitats. In addition, restoration of existing habitats is designed to decrease fragmentation to improve broader connectivity throughout the site.

ADAPTION

- 5.2.7. The step-wise approach has been used to ensure that loss of habitat is avoided and minimised and impacts on protected and priority species are appropriately mitigated where necessary. Enhancement of the site to increase extent, condition and connectivity serve to increase resilience of the site to change. The long-term approach to management is set out in the outline LEMP.
- 5.2.8. The proposed mitigation measures should ensure that the site condition is retained and enhanced in such a way that biodiversity of the site is increased, securing biodiversity net benefit which would be unlikely to occur in the absence of the Proposed Development.

5.3 BUILDING WITH NATURE FRAMEWORK

- 5.3.1. PPW12 establishes the submission of proportionate GIS with planning applications and refers to the BwN Standards as good practice.
- 5.3.2. As set out within the BwN briefing 'Delivering High Quality Green Infrastructure in Wales', BwN is for all those engaged in placemaking who want to create better places for nature and people to thrive. It is an evidence-based framework of 12 quality standards that collectively define what good GI looks like. Its purpose is to help create resilient, healthy places where wildlife thrives, where people want to live, and which respond positively in a changing climate.

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

Table 5-2 - BwN Core Standards

BwN Standard	Evidence	Assessment
<p>Standard 1: Optimises Multifunctionality and Connectivity – the green infrastructure optimises multifunctionality and connectivity within the boundary of the project and links with the existing and planned for green infrastructure in the surrounding area</p>	<ul style="list-style-type: none"> ■ Planning Statement ■ Design and Access Statement ■ Environmental Statement: <ul style="list-style-type: none"> ● Chapter 3: Alternatives ● Chapter 4: Proposed Development ● Chapter 8: Biodiversity ● Chapter 9: Ornithology 	<p>The Proposed Development is to construct and operate a wind farm of up to seven turbines. The turbines will provide a source of renewable energy that will support the needs of Wales and contribute to meeting Climate Change objectives. The scale of the Proposed Development will go some way to meeting national wind priorities and help ensure that Wales moves towards net zero carbon in 2050. It also has the potential to reduce the levels of CO2 emitted into the atmosphere by replacing that generated through fossil fuels.</p>
<p>Standard 2: Positively Responds to the Climate Emergency – the green infrastructure is designed to be climate resilient by incorporating mitigation and adaptations that respond to the impacts of climate change. The green infrastructure is designed to promote low carbon behaviours and contributes to achieving zero carbon development by optimising carbon sequestration and demonstrating low carbon approaches to design, construction and long-term maintenance</p>	<ul style="list-style-type: none"> ■ CEMP ■ Outline LEMP 	<p>In terms of its GI contribution, the development has been designed to make the most effective use of the land for wind power generation. As such, it is proposed to be located in an elevated area where there is excellent wind resource. In order to reduce the impact upon local amenity, it has also been purposefully located away from houses. Therefore, by way of the nature of the Proposed Development, there is limited opportunity for multifunctional GI provision.</p>
<p>Standard 3: Maximises Environmental Net Gains – the green infrastructure is designed to actively mitigate any unavoidable harmful environmental impacts of development on soil and air quality and to minimise light and noise pollution. In addition, it delivers environmental net gains, including improving air and water quality and wherever possible includes quiet spaces for people and wildlife.</p>		<p>However, the approach undertaken for the desktop study and surveys, design, and assessment outlined in the ES, show how the use proposed can exist within, and support the use of, multifunctional GI. An assessment of the site’s wider context also formed a key part of the site selection process. Further</p>
<p>Standard 4: Champions a Context Driven Approach – the green infrastructure positively</p>		

BwN Standard	Evidence	Assessment
<p>responds to the local context, including the physical environment, such as landscape and urban character and social, economic and environmental priorities, including the evidenced needs and strengths of existing and future local communities.</p>		<p>details regarding the site selection process and the factors considered are set out within the Design and Access Statement. The applicant is committed to preparing an outline LEMP that will set out the objectives for biodiversity protection, mitigation, monitoring, and habitat enhancement measures (where applicable). This will secure the long-term management and monitoring of habitats and species on the site and will be developed in consultation with BGBC and TCBC following determination of the application. The outline LEMP can be secured via a suitably worded planning condition. In addition, a CEMP supports this submission and will be implemented during the entirety of the construction stage. This will ensure that construction activities for the Proposed Development are carried out in accordance with legislation and best practice for minimising the effects of construction on the environment and local communities.</p>
<p>Standard 5: Creates Distinctive Places – the green infrastructure is integral to the project and is designed to reinforce local distinctiveness and / or create a distinctive sense of place.</p>		
<p>Standard 6: Secures Effective Place-keeping – the green infrastructure is subject to management arrangements that demonstrate a commitment to effectively implement, establish and maintain features at all stages of the development process. This should include details of funding, governance, maintenance, monitoring, remediation and, where appropriate, community involvement and stewardship.</p>		

Table 5-3 - BwN Wellbeing Standards

BwN Standard	Evidence	Assessment
<p>Standard 7: Brings Nature Closer to People – The green infrastructure is close to where people live, work, learn, play and / or visit and is designed to optimise use and enjoyment for everyone across the year, to maximise health and wellbeing outcomes and to promote active living for existing and future communities.</p>	<ul style="list-style-type: none"> ■ Planning Statement ■ Design and Access Statement ■ Common Land Report ■ Environmental Statement: <ul style="list-style-type: none"> ● Chapter 16: Socio Economics 	<p>As set out above, one of the features that makes a site suitable for wind farm development is that it is located away from residential development and other potential sensitive receptors. As such, the development has not been designed to encourage everyone to use it and enjoy it.</p> <p>The Site is crossed by a network of public footpaths (PRoWs) many of which cross the proposed access route to the turbines and the proposed grid connection corridor. A short section of one of these, public right of way 423/203/1, will be temporarily closed, but this will be limited to the construction phase only. Once</p>
<p>Standard 8: Supports Equitable and Inclusive Places – the green infrastructure is designed to encourage and enable everyone, including those from vulnerable or excluded groups, to use and enjoy it, help reduce health</p>		

BwN Standard	Evidence	Assessment
<p>inequalities and to build a shared sense of community and belonging.</p>		<p>operational the public footpath will be returned to its former use and fully accessible. The interruption would therefore be short-lived.</p> <p>In addition, part of the Site is within Mynydd Llanhilleth Common which is designated as Common Land</p> <p>As such, public access to parts of the site is provided. Moreover, the applicant is providing replacement land for the small elements of the common that will be utilised by the new turbines. The amount of replacement land that is being provided exceeds the amount that is being released (10 acres compared to 7.1 acres).</p> <p>With the implementation of the replacement land and suitable environmental measures outlined in the ES, user experience will not be significantly affected.</p> <p>In addition, the applicant is conscious of the role of the Proposed Development within the community and wants to ensure that it shares some of the financial benefits of having the wind farm in the area. This will be implemented by a Community Benefit Fund, the mechanism of which will be confirmed post consent, should the application be permitted. The Applicant, across all of its wind farm projects, has distributed around £4 million within South Wales to important local initiatives¹. Examples of funded projects include new facilities at Aberdare Park and Ogmere Vale RFC².</p>

¹ See [Mynydd-Llanhilleth-Community-benefits-presentation-January-2023](#).

² [News | Walters Pennant \(pennantwalters.co.uk\)](#)

Table 5-4 - BwN Water Standards

BwN Standard	Evidence	Assessment
<p>Standard 9: Delivers Climate Resilient Water Management – the green infrastructure is integral to sustainable drainage using above ground features to manage flood risk, maintain the natural water cycle and improve water quality within the boundary of the project and at a catchment scale. The green infrastructure is designed to be drought resistant and wherever possible, includes measures for the retention and the reuse of rainwater.</p>	<ul style="list-style-type: none"> ■ Planning Statement ■ Design and Access Statement ■ Environmental Statement: <ul style="list-style-type: none"> ● Chapter 8: Biodiversity; ● Chapter 9: Ornithology ■ CEMP ■ Outline LEMP 	<p>The application is supported by a FCA which assesses the potential for flood risk impacts associated with the Proposed Development. It also includes the proposed outline surface water drainage strategy, which will be agreed in consultation with TCBC and BGCBC. This has been prepared taking account of the baseline hydrology conditions across the Proposed Development, which were established by desk-based information sources as well as a walkover survey.</p>
<p>Standard 10: Brings Water Closer to People – the green infrastructure is designed to integrate water, including areas of standing water, flowing water, seasonal and ephemeral features, to bring additional amenity and wildlife benefits.</p>		<p>A series of embedded measures are proposed including good working practices, drainage and materials management and management of water discharges which would support appropriate management of the aquatic environment, water resources and flood risk during the construction phase. Measures such as a detailed drainage design utilising SuDS principles and appropriate fuel storage would be implemented in the operational phase.</p> <p>The FCA concludes that the Proposed Development, together with proposed flood risk management measures, would not be subject to an unacceptable level of risk, nor would there be potential increased flood risk elsewhere.</p>

Table 5-5 - BwN Wildlife Standards

BwN Standard	Evidence	Assessment
<p>Standard 11: Delivers Wildlife Enhancement – the green infrastructure optimises long term and climate resilient net benefits for nature, by retaining and enhancing existing ecological assets and creating locally relevant new habitats within the</p>	<ul style="list-style-type: none"> ■ Planning Statement ■ Design and Access Statement ■ Environmental Statement: <ul style="list-style-type: none"> ● Chapter 8: Biodiversity; ● Chapter 9: Ornithology 	<p>A range of surveys have been undertaken in order to establish the biodiversity baseline of the Site. These are outlined in Section 3.2 of this statement.</p> <p>In terms of the delivery of biodiversity enhancement, an</p>

BwN Standard	Evidence	Assessment
<p data-bbox="199 302 614 459">boundary of the project. Wildlife measures are secured at all stages of implementation and where applicable, across multiple phases of development.</p> <p data-bbox="199 481 614 761">Standard 12: Underpins Nature’s Recovery – the green infrastructure creates effective links with existing and planned for ecological features and networks beyond the boundary of the project to support the creation and restoration of resilient ecological networks in the wider landscape.</p>	<ul data-bbox="638 302 845 380" style="list-style-type: none"> ■ CEMP ■ Outline LEMP 	<p data-bbox="1077 302 1484 481">outline LEMP will be submitted with this application. This will set out the objectives for biodiversity protection, mitigation, monitoring and habitat enhancement measures (where applicable).</p> <p data-bbox="1077 504 1484 750">The measures will ensure that any potential impacts arising from the scheme are adequately mitigated and that a net benefit to biodiversity will be delivered from an early stage. The outline LEMP can be secured via a suitably worded planning condition.</p> <p data-bbox="1077 761 1484 1008">An ECMS will also be prepared which will set out in detail the measures to be implemented to protect important ecological features during the construction phase of the Proposed Development. This can be secured by planning condition.</p> <p data-bbox="1077 1019 1484 1108">The CEMP would ensure appropriate management measures in place.</p>

6 CONCLUSION

6.1 SUMMARY OF THE GREEN INFRASTRUCTURE ASSESSMENT

- 6.1.1. Through the approach undertaken to desktop studies and surveys, the design, and the assessment of the Proposed Development outlined within the ES, and other supporting documents with the application, it is demonstrated how the proposed use can exist within, and support the use of, GI. The supporting DAS sets out the clear context for the Proposed Development, and how the design has evolved as a result of the consideration of the surrounding environment.
- 6.1.2. In particular for this Project, the application site forms part of Mynydd Llanhilleth Common which is designated as Common Land. It is also crossed by a network of public footpaths (PRoWs) many of which cross the proposed access route to the turbines and the proposed grid connection corridor. The applicant proposes to provide replacement land for the elements of the common that will be utilised by the new turbines. The amount of replacement land will exceed the amount that is being released (10 acres compared to 7.1 acres). In terms of the public rights of way across the common, a short section of one public right of way (ref: 423/203/1) will be temporarily closed but only during the construction phase. As a result the interruption would be shortlived. Once operational the footpath will be returned to its former use and fully accessible. In light of the above, the Proposed Development will enable ongoing access to the common land which forms an important part of the green infrastructure network in the local area, providing access into existing green space and green corridors surrounding the site.
- 6.1.3. As set out in Section 4 of this Statement, the step-wise approach has been used to ensure that loss of habitat is avoided and minimised and impacts on protected and priority species are appropriately mitigated where necessary. Suggested mitigation and enhancement will be appropriately secured through the outline LEMP, CEMP, CMMS and ECMS. These measures will ensure a net benefit to biodiversity is provided.
- 6.1.4. As such, the Proposed Development is considered to comply with the requirements set out in PPW12 in respect of GI.



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