



Parc Ynni Calon y Gwynt

ENVIRONMENTAL STATEMENT

Appendix 5H: Access Road Ground Level Tree
Assessment Report





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EXECUTIVE SUMMARY

WSP UK Ltd (WSP) was commissioned by Wind2 Ltd to undertake updated bat surveys to support the construction of a proposed access track ('the Proposed Access Road'). The access track will facilitate the Proposed Development of National Significance (DNS) Parc Ynni Calon Y Gwynt (to be located within the 'Main Site'). The Proposed Access Road is planned to extend for approximately 4.6 km from the southern grid reference SO 01501 93804 to the northern grid reference SO 01194 95975 (the 'Access Road Site').

A Preliminary Ecological Appraisal (PEA) of the Access Road Site and up to 30 m around the Access Road Site has previously been undertaken by WSP which included a desk study (a search for records of protected and / or notable species within the Access Road Site and adjacent land within various buffers) and a habitat survey¹.

Following the PEA, WSP undertook a ground level tree assessment (GLTA) of a previous design of the Proposed Access Road and up to 20 m around this to search for trees with potential roost features (PRFs) with suitability to support bats.

Given ecological survey data is typically valid for 18 months and the design of the Proposed Access Road has changed since the previous GLTA surveys, WSP undertook an update GLTA survey of the Access Road Site and up to 20 m around this ('the Survey Area'). Where possible the PRFs of trees were subsequently subject to a PRF inspection survey. The PRF inspection survey allows for a more detailed assessment of the suitability of the PRF and for the determination of the presence or likely absence of bats at the time of the inspection.

Whilst no bats were identified during the PRF inspection surveys, 13 trees were assessed as having suitability for supporting roosting bats. The trees were classified as follows:

- PRF-M² – seven trees (T1, T2, T21, T30, T34, T35 and T36);
- PRF-I³ – five trees (T6, T26, T32, T37 and T38); and
- Further Assessment Required (FAR) – one tree (T20).

The design of the Proposed Access Route is such that T1, T2, and T34 are to be subject to permanent loss (or complete removal), whilst T21, T35, T36, and T38 are within the temporary construction area, and therefore may require removal or lopping.

In the first instance, the Proposed Access Road should be designed to avoid trees / limbs with PRFS. Where this is not possible, precautionary methods should be undertaken (including further surveys) and mitigation measures have been provided, these include;

- Further surveys of trees assessed as PRF-M and FAR, to determine presence / likely absence of roosting bats. The results of these surveys will form part of the final ES submission;

¹ Appendix 5A: Access Road Preliminary Ecological Appraisal of the Environmental Statement.

² PRF is suitable for multiple bats and may therefore be used by a maternity colony.

³ PRF is suitable for individual bats or very small numbers of bats.



- Pre-works check immediately prior to removal of any PRF; and
- Installation of two bat boxes for loss of PRF-M, and installation of one bat box for loss of PRF-L.

If at any point roosting bats are found to be present, a Natural Resources Wales (NRW) licence may need to be sought prior to removal works continuing. Should this happen, additional mitigation measures / further surveys may also be required.

A separate Net Benefit for Biodiversity (NBB) report will be prepared for the Proposed Access Road and will detail how the Proposed Access Road will comply with NBB.

1 INTRODUCTION

1.1 PROJECT BACKGROUND

- 1.1.1 WSP UK Limited (hereafter referred to as 'WSP')⁴ was commissioned by Wind2 Ltd to undertake bat surveys to establish whether bat roosts are present or likely absent along the area of a proposed access road. The 'Proposed Access Road' would facilitate the construction of the prospective Development of National Significance (DNS) Parc Ynni Calon Y Gwynt (approximate central grid reference: SO 001 983, hereafter referred to as the 'Main Site').
- 1.1.2 The Main Site is located on the hills to the north of the A470 trunk road, approximately 3.5 km east of the village of Carno, 3.5 km north of the village of Pontdolgoch and 12 km north-west of Newtown. The Proposed Access Road is planned to extend for approximately 4.6 km from the southern grid reference SO 01501 93804 to the northern grid reference SO 01194 95975, at which point the Proposed Access Road joins with the Main Site. Together the Proposed Access Road and the Main Site are referred to as the 'Combined Site'.
- 1.1.3 The Proposed Access Road route will bisect farmland, hedgerows, woodland and scrub and will connect the A470 to the Main Site. The indicative route of the Proposed Access Road is presented within **Figure 5H 1** and is hereafter referred to as the 'Access Road Site'.

1.2 ECOLOGICAL BACKGROUND

- 1.2.1 A Preliminary Ecological Appraisal (PEA) for the Proposed Access Road was undertaken by WSP in 2023 and 2024⁵. This PEA included a desk study and a Phase 1 habitat survey of the Access Road Site⁶ and up to 30 m either side of the Access Road Site where safe and accessible. As a part of the desk study, records of bats within 10 km of the Combined Site were requested from the Biodiversity Information Service for Powys & Brecon Beacons National Park (BIS).⁷, a freely available source of desk study data and was used to identify records of statutory designated sites for bat within 30 km of the Combined Site.
- 1.2.2 A total of 94 records of bats were identified during the desk study. Bat species returned from the desk study included:
- Brown long-eared bat *Plecotus auritus*;
 - Common pipistrelle *Pipistrellus pipistrellus*;
 - Daubenton's bat *Myotis daubentonii*;

⁴ WSP have provided this report solely for the use of the recipient and accepts no liability to any third parties or any other party using or reviewing the report or any part thereof. WSP makes no warranties or guarantees, actual or implied, in relation to this report, or the ultimate commercial, technical, economic, or financial effect on the project to which it relates, and bears no responsibility or liability related to its use other than as set out within the scope of the contract under which it was supplied.

⁵ Appendix 5B: Access Road Preliminary Ecological Appraisal of the Environmental Statement (ES).

⁶ This Site represents the previous Proposed Access Road design.

⁷ DataMapWales. (n.d.). DataMapWales. Homepage available at: <https://datamap.gov.wales/>

- Lesser horseshoe bat *Rhinolophus hipposideros*;
- Natterer's bat *Myotis nattereri*;
- Noctule bat *Nyctalus noctula*; and
- Soprano pipistrelle *Pipistrellus pygmaeus*.

1.2.3 In addition, there were also records of myotis bats *Myotis sp.* and pipistrelle bats *Pipistrellus sp.* not identified to species level.

1.2.4 A total of 15 statutory designated sites designated for bats were identified during the desk study. The closest of these was Gregynog Site of Special Scientific Importance (SSSI) which was located 6.69 km to the east of the Access Road Site. Gregynog SSSI supports foraging lesser horseshoe bats.

1.2.5 A Daytime Bat Walkover (DBW) was undertaken alongside the Phase 1 habitat survey over two separate days on 22 June 2023 and 12 October 2023 as part of the PEA. The DBW was undertaken in accordance with bat survey best practice guidance⁸. The DBW was intended to assess the suitability of the habitats present to support roosting, commuting and foraging bats. This would allow for the appropriate recommendations of further surveys. During the DBW, 16 trees were recorded as having suitability to support roosting bats.

1.2.6 Subsequently, a Ground Level Tree Assessments (GLTA) was undertaken of all trees within the Access Road Site and up to 20 m either side of the Access Road ⁹ where safe and accessible in July 2024. Where possible the trees were subsequently subject to a potential roost feature (PRF) inspection. These surveys were undertaken in accordance with bat survey best practice guidance⁸. A total of 32 trees were identified as having PRFs with suitability for supporting bats.

1.3 BRIEF AND OBJECTIVES

1.3.1 Given ecological survey data is typically valid for 18 months¹⁰ and the design of the Proposed Access Road has changed since the previous GLTA and PRF inspection surveys, Wind2 Ltd commissioned WSP to complete further bat surveys of the Access Road Site. The brief was to:

- Complete an update GLTA and PRF inspection surveys of the Access Road Site; and
- Evaluate the value of the Access Road Site for roosting bats and make recommendations as to how the Proposed Access Road should account for bats with respect to legislation, planning and biodiversity policy.

1.3.2 The results of these surveys, and subsequent recommendations, are included within this report.

⁸ Collins J. (ed.) (2023) Bat Surveys for Professional Ecologists, Good Practice Guidelines (4th Edition). The Bat Conservation Trust, London.

⁹ This Site represents the previous Proposed Access Road design.

¹⁰ CIEEM. (2019). Advice Note: On The Lifespan of Ecological Reports and Surveys.

2 METHODS

- 2.1.1 An update GLTA was carried out by WSP of the Access Road Site and up to 20 m either side of the Access Road Site where safe and accessible (hereafter referred to as the 'Survey Area'). Where possible any PRFs identified during the GLTA were subsequently subject to a PRF inspection. These surveys were undertaken in accordance with bat survey best practice guidance⁸. The GLTA and PRF inspection surveys were undertaken over four days between 24 and 26 February 2026 and on 7 May 2026. The Access Road Site and the Survey Area are provided in **Figure 5H 1**.

2.2 GROUND LEVEL TREE ASSESSMENT

- 2.2.1 Trees within the Survey Area were inspected from the ground to enable an assessment of their suitability to support roosting bats.
- 2.2.2 A visual inspection of trees was completed to search for features which may provide roosting opportunities for bats. Where suitable features were noted, their location and a brief description of the character was recorded.

2.3 PRF INSPECTION SURVEY

- 2.3.1 The PRF inspection survey comprised an endoscope inspection of all PRFs within each tree (where safe and accessible) by an appropriately qualified and licensed ecologist (NPTC CS38¹¹ tree climbing and aerial rescue, Natural Resources Wales (NRW) Bat Survey Licence, full member of the Chartered Institute of Ecology and Environmental Management (CIEEM)). Inspections were undertaken using a small torch and endoscope, to search for bats and to search for any evidence of bats having previously been present. Inspections were carried out in accordance with bat survey best practice guidance⁸.
- 2.3.2 The following information was recorded during the close inspection survey for each PRF:
- Approximate internal dimensions;
 - Whether dry or wet;
 - Evidence of use by birds, squirrels, or other non-bat species;
 - Evidence of bat activity (smoothing of internal surfaces, droppings, bat fly *Nycteribiid* spp. pupae, feeding remains, staining); and / or
 - The presence, number and species of bats observed.
- 2.3.3 Each tree with suitability to support roosting bats was subsequently categorised as either Further Assessment Required (FAR) or being a confirmed roost or as having PRF-M or PRF-I suitability (see **Table 2-1**), based on the PRFs present. Where a single tree exhibited multiple PRFs of varying degrees of suitability for roosting bats, the tree was categorised according to the PRF with the highest suitability. If a tree was found to have no suitability for roosting bats, it was described as None.

¹¹ City & Guilds / NPTC Level 2 Aware in Tree Climbing and Rescue – units 206 and 306 and refresher training (where relevant).

2.3.4 Following all surveys an indication was also given to the potential roost types that could be supported¹²:

- Maternity (occupation by a maternity colony during pregnancy and nursery periods);
- Transitory / summer day roost (occupation by 1-3 bats during this period);
- Mating (occupation by any number of bats during the mating period); and
- Winter (occupation by any number of bats during the winter period).

Table 2-1 - PRF Suitability Categorisation⁸

Category	Description	Minimum number of survey visits ¹³
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.	At least three visits between May – September, with at least two in the period May – August. ¹⁴
PRF-I	PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitat.	At least one visit between May – August.
FAR	Further assessment required to establish if PRFs are present in the tree.	Further surveys (i.e. emergence surveys) may be required to determine presence or likely absence. This may comprise up to three emergence surveys between May – September, with at least two in the period May – August.

2.4 NOTES AND LIMITATIONS

- 2.4.1 The ecological survey data collected as part of this report is considered valid for 18 months¹⁰ unless otherwise specified, for example if conditions are likely to change more quickly due to ecological processes or changes in management.
- 2.4.2 Records held by local biological record centres and local recording groups are generally collected on a voluntary basis; therefore, the absence of records does not demonstrate the absence of species, it may simply indicate a gap in recording coverage.
- 2.4.3 The numbering system for trees with suitability to support roosting bats has been kept consistent in line with previous reports. Some trees which were previously identified with PRFs during the July 2024 GLTA have been excluded from this report as they are now located outside of the Survey Area and are not considered to be at risk from the Proposed Access Road.

¹² Bat Tree Habitat Key (2018) Bat Roosts in Trees: A guide to identification and assessment for tree-care and ecology professionals. Pelagic Publishing. Exeter

¹³ In accordance with the principles of the BTHK, it is recognised that bat use of tree roost features can occur year-round and may be transient. As such, where necessary survey effort may be adapted to include inspections across multiple seasons (spring, summer, autumn and winter) to better characterise roost use.

¹⁴ This timeline does not cover hibernation checks and therefore where a PRF is deemed suitable for hibernation use, it is recommended that further surveys are conducted during the appropriate survey window (typically November – February).

3 RESULTS

- 3.1.1 Of the 32 trees identified with suitability for supporting roosting bats in July 2024, 21 are now located outside of the Survey Area, and are not considered to be at risk from the Proposed Access Road. In addition, three additional trees (T36, T37 and T38) were identified within the Survey Area.
- 3.1.2 The thirteen trees identified within the Survey Area with PRFs during the 2026 GLTA were subject to a PRF inspection survey (as per good practice survey guidance⁸). The results of the PRF inspection surveys are listed below and are categorised in line with the descriptions in **Table 2-1**:
- PRF-M – seven trees (T1, T2, T21, T30, T34, T35 and T36);
 - PRF-I – five trees (T6, T26, T32, T37 and T38); and
 - FAR – one tree (T20).
- 3.1.3 The locations and results of the trees surveyed are shown in **Figure 5H 2**. Descriptions of the PRF type(s) identified on each tree, along with the bat species considered likely to use each PRF (based on the type and species of bats known within the local region^{12,15}, are provided **Annex 5H.1**. Select photographs of tree PRFs are provided in **Annex 5H.2**.
- 3.1.4 No bats, or evidence of use by bats, were identified during the PRF inspection surveys.

¹⁵ Mathews F, Smith B, Harrower C, Coomber F in association with the Wales Mammal Biodiversity Action Forum. (2020). The State of Mammals in Wales. A report by the Mammal Society for Natural Resources Wales, produced in association with Wales Mammal Biodiversity Action Forum. The Mammal Society, London. ISBN: 978-0-9935673-6-0.

4 IMPLICATIONS FOR DEVELOPMENT

- 4.1.1 The Proposed Access Road has the potential to affect bats, directly through the removal of a trees and / or removal of limbs with a PRF to facilitate the Proposed Access Road.
- 4.1.2 Should any trees identified with suitability to support roosting bats (T1, T2, T6, T20, T21, T26, T30, T32, T34, T35, T36, T37 and T38) be directly impacted by the Proposed Access Road, further surveys will be required to ensure proportional survey effort has been undertaken as per best practice guidance⁸.
- 4.1.3 The design of the Proposed Access Route is such that T1, T2, and T34 are to be subject to permanent loss (or complete removal), whilst T21, T35, T36, and T38 are within the temporary construction area.
- 4.1.4 Further details on the requirements of further surveys is detailed in **Section 5.1**. Should bats be found to be present during any further surveys, it may be necessary to apply to NRW for a European Protected Species licence to remove the bat roosts to facilitate works associated with the construction of the Proposed Access Road.
- 4.1.5 Further survey requirements, avoidance, mitigation and precautionary measures are detailed in **Section 5**.

4.2 LEGAL COMPLIANCE

- 4.2.1 The legislation and planning policy relevant to bats and their roosts is set out below. Recommendations as to how the legislation and planning policy may be satisfied are set out in **Section 5**.
- 4.2.2 Bats and their roosts are afforded a high level of protection under The Conservation of Habitats and Species Regulations 2017 (as amended) (Habitats Regulations)¹⁶, the legislation means that it is an offence to:
 - Deliberately capture, injure or kill a wild bat;
 - Deliberately disturb wild bats; *'disturbance of animals includes in particular any disturbance which is likely:*
 - (a) *To impair their ability; —*
 - (i) To survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) In the case of animals of a hibernating or migratory species, to hibernate or migrate.
 - (b) *To affect significantly the local distribution or abundance of the species to which they belong.*
 - Damage or destroy a breeding site or resting place used by this species.

¹⁶ His Majesty's Stationary Office (HMSO) (2019). The Conservation of Habitats and Species Regulations 2017 (as amended) (Habitats Regulations).

- 4.2.3 Protection is also afforded under the Wildlife and Countryside Act 1981 (as amended) (WCA)¹⁷ with respect to disturbance of animals when using places of shelter, and obstruction of access to places of shelter.
- 4.2.4 Due to the high level of protection afforded to bats and their habitat, mitigation for this species is governed by a strict licensing procedure administered by NRW (normally, planning permission must be obtained before a licence can be sought). Licencing is subject to three tests, as defined under the Habitats Regulations, these must also be applied by the planning authority before granting permission for activities affecting bats. For permission to be granted the following criteria must be satisfied:
- The proposal is necessary for '*preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial Consequences of primary importance for the environment*';
 - '*There is no satisfactory alternative*'; and
 - The proposals '*will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range*'.
- 4.2.5 Certain species of bats including the barbastelle bat *Barbastella barbastellus*, Bechstein's bat *Myotis bechsteinii*, noctule bat, brown long-eared bat, common pipistrelle, soprano pipistrelle bat, greater horseshoe bat *Rhinolophus ferrumequinum* and lesser horseshoe are also listed as Priority Species under Section 7 of the Environment (Wales) Act 2016¹⁸. Under Section 7 of the Environment (Wales) Act 2016, Welsh Ministers must take all reasonable steps to maintain and enhance the living organisms and types of habitats included on any list published under this section and encourage others to take such steps.

4.3 PLANNING POLICY COMPLIANCE

- 4.3.1 At the national level the Planning Policy Wales (PPW) Edition 12¹⁹ forms the basis for planning system decisions with respect to conserving and enhancing the natural environment, including protected species such as bats.
- 4.3.2 PPW Edition 12 states:
- "A Resilient Wales can be supported by protecting and providing sufficient scale, extent, diversity and connectivity within, and between, landscapes and habitats to maintain and enhance biodiversity and the resilience of ecosystems. This support will enable them to withstand the pressures of change, to tackle pollution, to protect and enhance water resources, to protect soils and to enable flood mitigation, the creation of carbon sinks (especially in urban areas), and to promote opportunities for social and economic activity based on valuing and enabling access to the natural, historic and built environment."
- 4.3.3 The PPW sets out, amongst other points, how at an overview level the '*planning system should contribute to and enhance the national and local environment by*:'

¹⁷ HMSO (1981). Wildlife and Countryside Act (as amended by the Countryside and Rights of Way Act 2000).

¹⁸ Welsh Government. (2016). Environment (Wales) Act 2016.

¹⁹ Welsh Government. (2024). Planning Policy Wales (PPW). (Edition 12) 2024.

- *Recognising the wider benefits of ecosystem services; and*
- *Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.'*

4.3.4 A list of principles which local planning authorities should follow when determining planning applications is included in the PPW, and includes the following:

- *'If significant harm resulting from a development cannot be avoided...adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- *Opportunities to incorporate biodiversity in and around developments should be encouraged; and*
- *Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland unless the need for, and benefits of, the development in that location clearly outweigh the loss'.*

4.3.5 Under Section 6 of the Environment (Wales) Act 2016 public authorities that exercise their functions in relation to Wales have a duty to maintain and enhance biodiversity and promote the resilience of ecosystems.

4.3.6 One of the seven goals of the Well-being of Future Generations (Wales) Act (2015)²⁰ is to create a resilient Wales. This comprises maintaining and enhancing '*a biodiverse natural environment with healthy functioning ecosystems that support ecological resilience*'.

²⁰ Welsh Government(2015). Wellbeing of Future Generations (Wales) Act 2015.

5 RECOMMENDATIONS

5.1 FURTHER SURVEY REQUIREMENTS

- 5.1.1 Further surveys will only be required if any tree / limb with a PRF is required to be removed as a part of the Proposed Access Road. The design of the Proposed Access Route is such that T1, T2, and T34 are to be subject to permanent loss (or complete removal), whilst T21, T35, T36, and T38 are within the temporary construction area, and therefore may require removal or lopping.
- 5.1.2 Further surveys would typically include up to three additional surveys consisting of repeat PRF inspection surveys (to be undertaken between May – September, with at least two undertaken between May – August) for trees with PRF-M (T1, T2, T21, T34, T35 and T36²¹). These surveys will be undertaken in 2026 and will form part of the Final ES submission.
- 5.1.3 As tree T20 could not be fully surveyed due to health and safety reasons, presence or likely absence of bats should be determined through dusk emergence surveys. PRFs which could be assessed on T20 were considered to have PRF-M roost suitability. It is not anticipated that T20 will be directly affected by the Proposed Access Road. However, should this change and T20 requires lopping or removal, three emergence surveys should be carried out between May to September, with at least two surveys between May to August. Should this survey be required, it will be carried out prior to the commencement of the Proposed Development works.

5.2 AVOIDANCE

- 5.2.1 It has been assumed that any trees which fall within the Proposed Access Road footprint will be lost (T1, T2 and T34) and any trees which fall within the temporary working area are ‘at risk’ of potential lopping and / or pruning of select limbs (T21, T35, T36 and T38). Due to the value of trees as a potential roosting and foraging resource, in the first instance, steps should be taken to ensure all trees and tree limbs which have been identified as supporting PRFs for bats are retained where feasible.
- 5.2.2 The ‘Initial Bat Survey Update Note’²² (WSP, 2024^b) recommended that the Proposed Access Road avoided the mature trees and instead crossed areas of mostly immature trees where possible, to avoid the trees identified as having potential to support roosting bats. In addition, it was recommended that the Access Road follow the existing access track, thereby avoiding impacts to trees as far as possible. The design of the Access Road has evolved to implement these recommendations as far as possible, in accordance with the ‘stepwise approach’¹⁹.
- 5.2.3 It will not be possible to avoid trees with PRFs suitable to support roosting bats within the permanent works area, and therefore further surveys are required. In the case that the removal of some trees and the lopping and / or pruning of select tree limbs within the temporary working area are required to facilitate the Proposed Access Road and achieve the required clearance, further surveys should be undertaken as per **Section 5.1**.

²¹ Although T30 was identified as PRF-M, it will not be subject to permanent loss and is not within the temporary works area, and therefore no further surveys on T30 are required.

²² WSP (2024). Calon y Gwynt: Access Route Technical Note.

5.3 MITIGATION MEASURES

- 5.3.1 Bats roosting in trees exhibit an increased frequency of roost switching behaviours¹²; all trees with roosting suitability should therefore be considered an important part of the wider roosting resource available to bats within the Access Road Site⁸. Recommendations for mitigation for the loss of PRFs with roosting suitability are stated in **Table 5-1**. Furthermore, where tree limbs with bat roosting potential cannot be avoided, recommendations for mitigation for further measures are outlined within **Section 5.4 – Precautionary Methods**. Further surveys may identify additional constraints, in which case updated mitigation measures will be required and specified accordingly following the completion of these surveys.

Table 5-1 - Proposed Mitigation

Overall Suitability	Recommended Mitigation
Trees likely to be lost or 'at risk' – mitigation only implemented if tree / PRF are to be removed	
PRF-M	Installation of two bat boxes in a location as specified by an ecologist. Bat boxes should be installed prior to the removal of the tree.
PRF-I	Installation of one bat box in a location adjacent to the tree as specified by an ecologist. Bat boxes should be installed prior to the removal of the tree.

5.4 PRECAUTIONARY METHODS

- 5.4.1 Although no evidence of use by bats was identified at the time of the PRF inspection surveys, 13 trees have been assessed as having suitability for supporting roosting bats.
- 5.4.2 Owing to their highly mobile and opportunistic nature of roosting, bats may start using a roosting site after it has been surveyed or may have been roosting somewhere else during the period it was surveyed. Therefore, it is recommended that all trees with bat roosting suitability which are to be directly affected by the Proposed Access Road should be fully inspected by a licenced bat ecologist immediately prior to works commencing to ensure no bats are present. This is in addition to any further survey detailed in Section 5.1.
- 5.4.3 In the event that bats are found to be present during the pre-works inspection, works would be postponed, and advice sought from NRW. It may be necessary to apply for a licence from NRW to allow the lawful removal of the tree.

5.5 ECOLOGICAL ENHANCEMENT MEASURES

- 5.5.1 Net Benefit for Biodiversity (NBB) in association with development is required by PPW Edition 12 and is required under Section 6 of Part 1 of the Environment (Wales) Act 2016. Recommendations on how the Proposed Access Road can comply with NBB will be discussed in a separate NBB report (see **Appendix 50: Net Benefit for Biodiversity** of the ES).

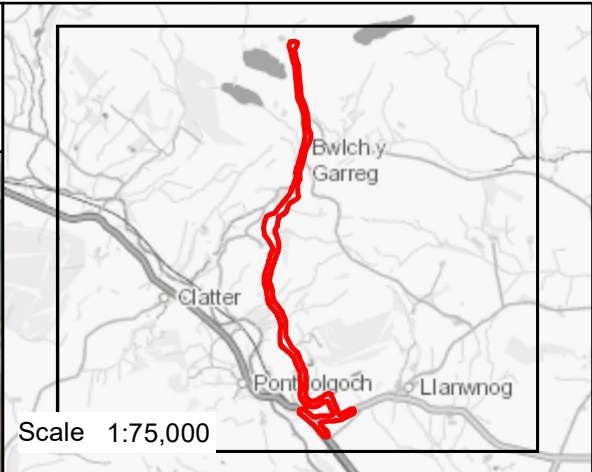
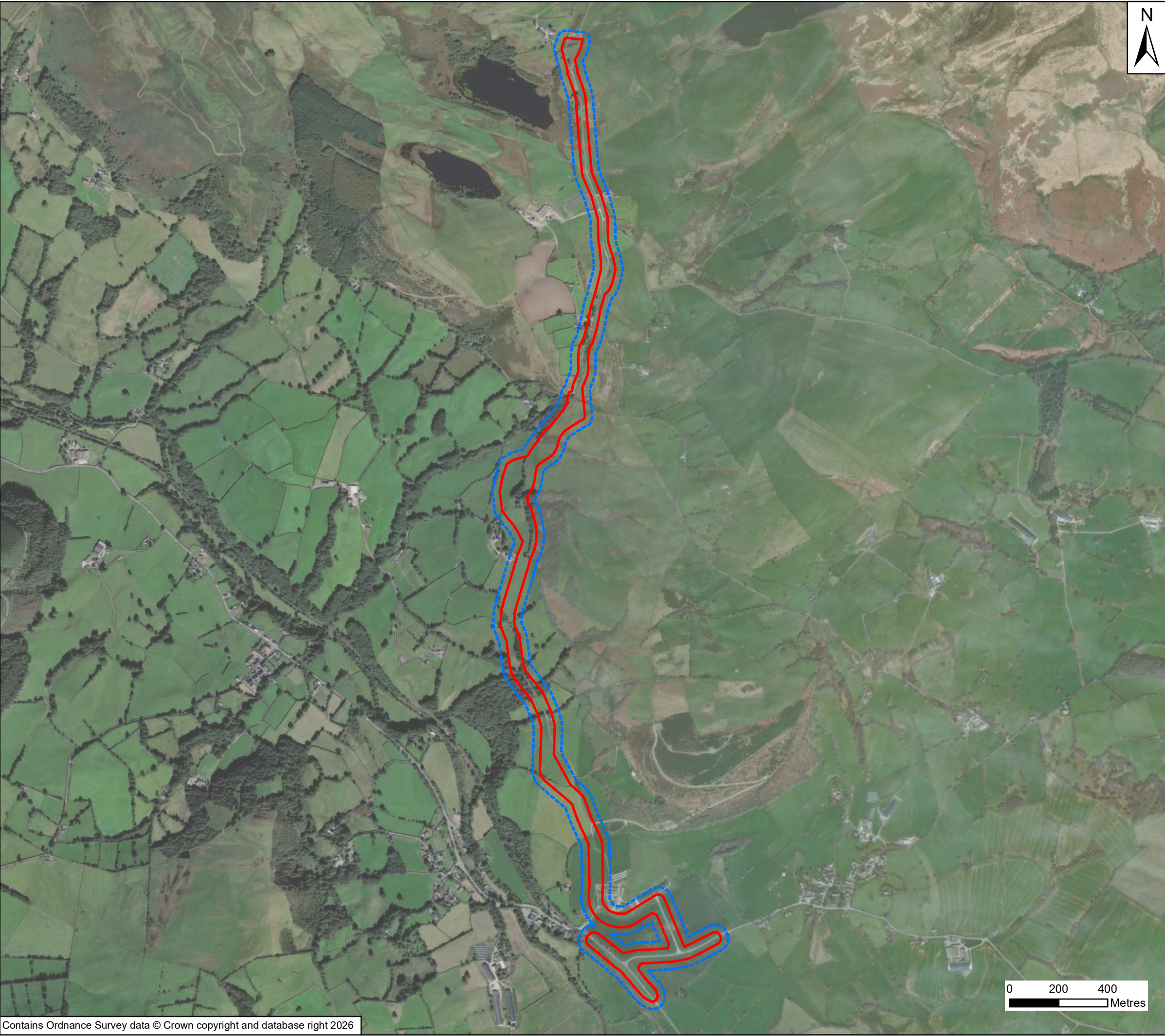
6 CONCLUSIONS

- 6.1.1 In total there are 13 trees with suitability for roosting bats within the Access Road Site:
- PRF-M – T1, T2, T21, T30, T34, T35 and T36;
 - PRF-I – T6, T26, T32, T37 and T38; and
 - FAR – T20.
- 6.1.2 No bats, or evidence of use by bats, were identified during the PRF inspection surveys. However, seven trees were assessed as having PRF-M suitability to support roosting bats and further surveys are required if the removal of a tree and / or removal of a limb with a PRF-M is required to facilitate the Proposed Access Road. Further surveys would also be required for T20, if it is determined that it will be impacted. Further survey will be required as per Section 5.1.
- 6.1.3 Due to the suitability of the identified trees within the Survey Area to support roosting bats, and the regular roost switching nature of bats (particularly of tree roosting bats), a precautionary method of working is recommended. This is in addition to the further surveys to be completed and included as part of the final submission of the ES, and includes the following:
- All trees should be protected and incorporated into the final design where possible. Where trees / limbs with PRFs are to be lost, alternative roosting provision should be provided in the form of bat boxes; and
 - Prior to the removal of trees / limbs with PRFs, the PRF(s) will be inspected by a licensed bat ecologist to confirm the continued absence of bats. If roosting bats are found to be present, works will stop and an NRW licence may need to be sought prior to removal works continuing.

7 FIGURES

Figure 5H 1 – Access Road Site Location Plan

Figure 5H 2 – Survey Results

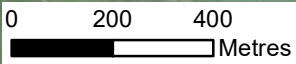


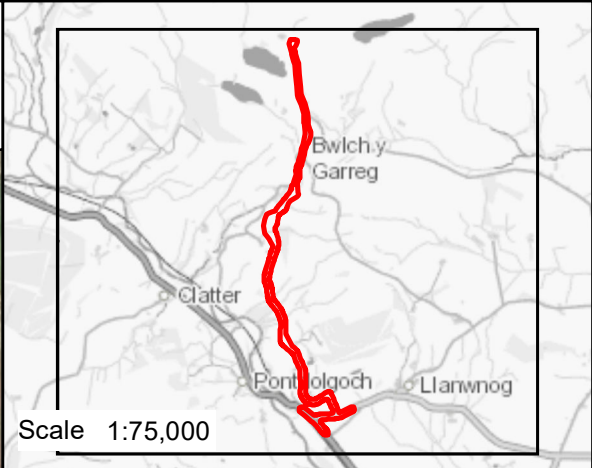
Key

-  Proposed Access Road
-  Survey Area



Client:	Wind2 Ltd		
Project:	Parc Ynni Calon Y Gwynt – Access Road		
Title:	Access Road Site Location Plan		
Drawing No:	Figure 5 H. 1	Drawn:	NG
Date:	6/5/2026	Checked:	ES
Scale:	15,000 @ A3	Approved:	MB

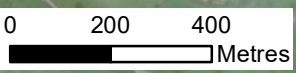




- Key**
- Survey Area
 - Bat Suitability**
 - PRF-M
 - PRF-I
 - FAR



Client:	Wind2 Ltd		
Project:	Parc Ynni Calon Y Gwynt – Access Road		
Title:	Survey Results		
Drawing No:	Figure 5 H. 2	Drawn:	NG
Date:	6/3/2026	Checked:	ES
Scale:	75,000 @ A3	Approved:	MB



Annex 5H.1

CLOSE INSPECTION SURVEY RESULTS

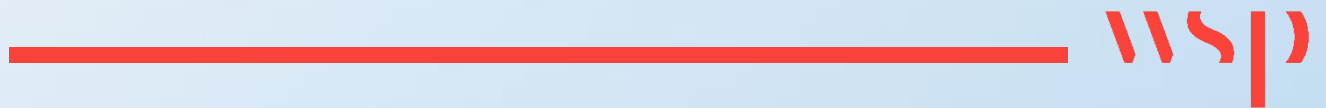


Table A-1 - Close Inspection Survey Results

Tree No	Tree Species	PRF No. and Type					Evidence of roosting bats recorded	Peak Count	Potential for different roost types ²³				Overall, Tree Bat Roost
		PRF ID	PRF Type	PRF Aspect and Height	PRF Description	PRF Grade			Breeding	Transitory	Mating	Hibernation	
T1	Sessile oak <i>Quercus petraea</i>	1	Knothole	Approximately 2 m on western aspect of main stem.	Knothole extends behind pruning cut for approximately 5 cm.	PRF-I	-	-	Y	-	Y	-	PRF-M
		2	Tear out wound	On top of limb sticking out on western aspect.	Tear out wound extended back approximately 5cm.	PRF-I	-	-	-	-	-	Y	
		3	Wound	Approximately 3 m on dead limb on eastern aspect overhanging a bank.	Wound extends in approximately 15 cm and is smooth inside.	PRF-M	-	-	Y	Y	Y	Y	PRF-M
T2	Oak <i>Quercus</i> sp.	1	Hazard Beam	Extending upwards from approximately 2.5 m to 6 m on western aspect of main stem	Shearing crack extends inwards approximately 15 cm and downwards approximately. Suitable for supporting numbers of bats.	PRF-M	-	-	Y	Y	Y	Y	PRF-M

²³ The BTHK provides examples of roost types that have been previously recorded in association with specific PRFs. Phase 1 habitat has not been incorporated into this process; therefore, classifications represent a precautionary worst-case scenario. However, these associations are not exhaustive, and the absence of a particular roost type from the key does not preclude its presence.

Tree No	Tree Species	PRF No. and Type					Evidence of roosting bats recorded	Peak Count	Potential for different roost types ²³				Overall, Tree Bat Roost
		PRF ID	PRF Type	PRF Aspect and Height	PRF Description	PRF Grade			Breeding	Transitory	Mating	Hibernation	
T6	Oak species	1	Transverse snap	In the crown of the tree, extending east.	Transverse snap with hole at the base and extending crack upwards approximately 5 m high. Transverse snap is open at the top and too exposed, but the extending crack has a 3 cm x 2 cm entrance which extends into a short tube approximately 5 cm up. It is rough, clean and dry. Bird / mouse nest present.	PRF-I	-	-	Y	Y	Y	Y	PRF-I

Tree No	Tree Species	PRF No. and Type					Evidence of roosting bats recorded	Peak Count	Potential for different roost types ²³				Overall, Tree Bat Roost
		PRF ID	PRF Type	PRF Aspect and Height	PRF Description	PRF Grade			Breeding	Transitory	Mating	Hibernation	
T20	Ash <i>Fraxinus excelsior</i>	1	Knothole	Approximately 4 m high on south side of western limb.	Excavated knothole with 4 cm x 4 cm entrance which extends 5 cm downwards and upwards and is multichambered. Bird nest at base. There is another knothole below which is negligible.	PRF-M	-	-	Y	-	-	-	PRF-M
		2	Woodpecker hole	Approximately 7 m high on southern limb.	Woodpecker hole open on either side.	PRF-I	-	-	Y	-	Y	-	
		3	Cankers	All over tree	All superficial	Negligible	N/A	N/A	Y	-	Y	Y	
		4	Woodpecker hole	West at 4.5m	5cm x 5cm entrance. Unable to check during close inspection survey	Not surveyed	N/A	N/A	Y	-	Y	-	

Tree No	Tree Species	PRF No. and Type					Evidence of roosting bats recorded	Peak Count	Potential for different roost types ²³				Overall, Tree Bat Roost
		PRF ID	PRF Type	PRF Aspect and Height	PRF Description	PRF Grade			Breeding	Transitory	Mating	Hibernation	
T21	Sessile oak	1	Tear out	On northern aspect	Tear out at top extends behind heart wood. Multiple 2-3 cm x 5 cm areas behind plates, extending upwards 10-15 cm. It is smooth, clean and dry with woodlice present.	PRF-M	-	-	-	-	-	Y	PRF-M
		2	Transverse snag	On southern aspect	Transverse snag 2 cm x 5 cm extends upwards 8 cm raising to wedged apex.	PRF-I	-	-	-	Y	-	-	
T26	Alder	1	Knothole	Approximately 3.5 m high on the southern aspect.	Knothole extends downwards approximately 5cm, it is smooth. Bird nest at the base.	PRF-I	-	-	-	-	-	-	PRF-I

Tree No	Tree Species	PRF No. and Type					Evidence of roosting bats recorded	Peak Count	Potential for different roost types ²³				Overall, Tree Bat Roost
		PRF ID	PRF Type	PRF Aspect and Height	PRF Description	PRF Grade			Breeding	Transitory	Mating	Hibernation	
T30	Oak species	1	Knothole	Approximately 3 m on southern aspect.	Knothole entrance 7 cm x 7 cm and extends into a bowl at the base and up to 20 cm. The entrance is smooth and it's rough and dry inside. Bird nest at the base.	PRF-M	-	-	Y	Y	Y	Y	PRF-M
		2	Knothole	Approximately 2.5 m on northern aspect	Knothole entrance 4 cm x 4 cm and extends approximately 15 cm upwards. It is rough, damp, with a peaked apex> Woodlice present.	PRF-M	-	-	Y	Y	Y	Y	
T32	Oak species	1	Hazard beam	Unknown	Hazard beam entrance 1.5 cm wide and extends 5 cm downwards and upwards. It is quite shallow and exposed with some tapering.	PRF-I	-	-	Y	Y	Y	Y	PRF-I

Tree No	Tree Species	PRF No. and Type					Evidence of roosting bats recorded	Peak Count	Potential for different roost types ²³				Overall, Tree Bat Roost
		PRF ID	PRF Type	PRF Aspect and Height	PRF Description	PRF Grade			Breeding	Transitory	Mating	Hibernation	
T34	Ash	1	Wound	On southeastern limb.	Three sections of wounds, the bottom wounds extend in 7 cm and are rough inside.	PRF-M	-	-	Y	Y	Y	Y	PRF-M
		2	Frost crack	0.5m	Front crack extends upwards approximately 45 cm from the top section and extends upwards approximately 10 cm from lower section, behind heartwood.	PRF-M	-	-	-	-	-	-	
T35	Ash	1	Knothole	Approximately 4 m on southern aspect.	Knothole diameter is approximately 5 cm and it extends upwards approximately 20 cm. It is smooth and polished. The knothole also extends down to butt rot, but is too open for bats.	PRF-M	-	-	Y	-	-	-	PRF-M

Tree No	Tree Species	PRF No. and Type					Evidence of roosting bats recorded	Peak Count	Potential for different roost types ²³				Overall, Tree Bat Roost
		PRF ID	PRF Type	PRF Aspect and Height	PRF Description	PRF Grade			Breeding	Transitory	Mating	Hibernation	
T36	Alder	1	Wound	Extends from 40 cm to 3 m on the northwestern aspect.	Would is enclosed for top 10 cm and has a diameter of 10 cm x 10 cm with an apex at the top. It is dry and rough and suitable for small numbers of bats.	PRF-M	-	-	Y	Y	Y	Y	PRF-M
T37	Unknown (Monolith) ²⁴	1	Desiccated fissures	N / A	Desiccated fissures all the way around, approximately 1.5 cm wide and 7 cm deep and extended all the way up. It is rough inside with woodlice and ladybirds. Some too narrow for bats.	PRF-I	-	-	Y	Y	Y	Y	PRF-I
T38	Oak species	1	Transverse snap	Unknown	Transverse snap, which is dry and smooth on the upper side, extends into heart wood.	PRF-I	-	-	Y	Y	Y	Y	PRF-I

²⁴ Monolith is not available in the BTHK, and therefore only the PRF type has been used in this instance. The classification for monolith therefore represents a precautionary worst-case scenario for bat roost types identified within desiccated fissures.

Annex 5H.2

PHOTOGRAPHS



Table B-1 - Photographs

Photo 1 – T1	Photo 2 – T2
	
Photo 3 – T6	Photo 4 – T20
	

Photo 5 – T21



Photo 6 – T26

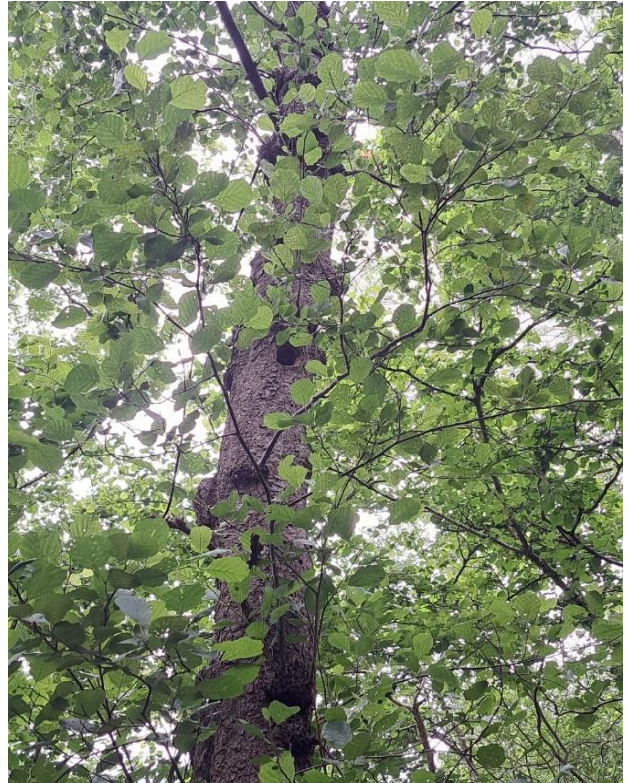


Photo 7 – T30



Photo 8 – T32



Photo 9 – T34

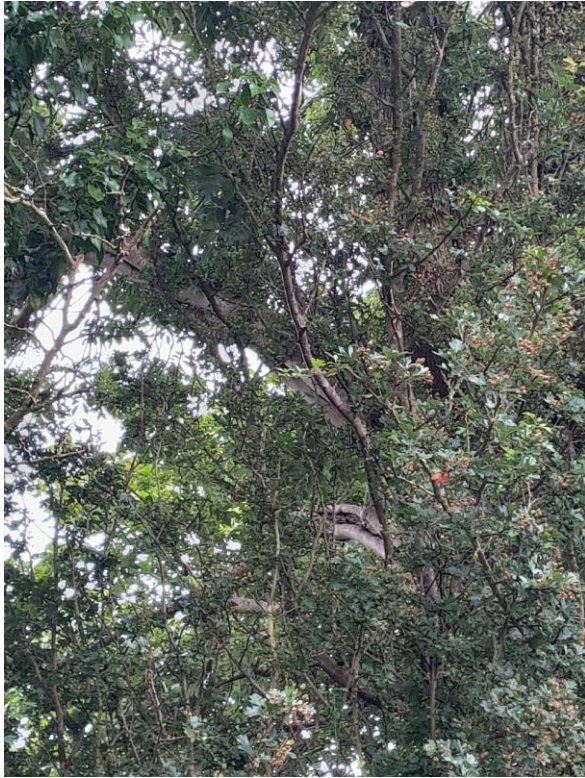


Photo 10 – T35



Photo 11 – T36



Photo 12 – T37

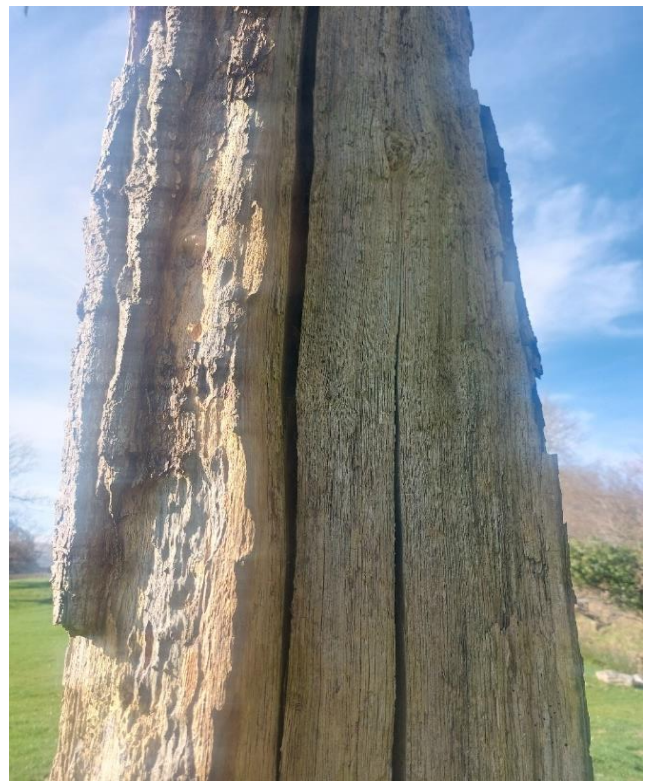


Photo 12 – T38





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