Parc Ynni Calon y Gwynt Cyf

PARC YNNI CALON Y GWYNT

Green Infrastructure Statement

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JULY 2026

PUBLIC

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Green Infrastructure Statement

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EXECUTIVE SUMMARY

This Green Infrastructure Statement (GIS) has been prepared by WSP UK Limited on behalf of Parc Ynni Calon y Gwynt Cyf (the Applicant) to support a Development of National Significance application for the construction and operation of Parc Ynni Calon y Gwynt, a proposed wind farm and battery energy storage system (BESS) development located approximately 2.7km to the north of Clatter within the Powys County Council administrative area.

Green Infrastructure (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.

This GIS describes how GI has been incorporated into the design of the Proposed Development 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. The GIS is assessed against the Building with Nature standards, which are set out within Planning Policy Wales Edition 12 (Paragraph 6.2.14) representing good practice standards to ensure the potential of the Proposed Development is maximised in the sustainable management of natural resources.

The step-wise approach taken by the Applicant in informing and subsequently refining the Proposed Development layout has avoided direct impacts to statutorily designated sites and reduced the impact on Priority Habitats through an iterative design process. Building on this, and in utilising the DECCA framework and applying the principles of the Building with Nature Standards Framework, the Applicant has developed and proposed a series of biodiversity net benefits to support both the Site and surrounding area – creating a resilient and connected ecosystem.

Overall, through implementation of the construction/site management techniques highlighted in the Outline Construction Environmental Management Plan and through the habitat management and enhancement mitigation proposals put forward in the Outline Habitat Management Plan and Net Benefit for Biodiversity report, it is concluded that the Proposed Development would provide environmental net benefits and create improved Green Infrastructure connectivity within the Site and surrounding area. In addition, the positive enhancements resulting from the Proposed Development shall support wider local, regional and national objectives in enhancing biodiversity and green infrastructure in Wales.

In conclusion, the Applicant considers that the step-wise approach has been applied in the evolution of the design of the Proposed Development and is compliant with the relevant policy and guidance, providing a net benefit for biodiversity and strengthening green infrastructure.

1 INTRODUCTION

1.1 OVERVIEW

1.1.1. This Green Infrastructure Statement (GIS) has been prepared by WSP UK Ltd (WSP) on behalf of Parc Ynni Calon y Gwynt Cyf (the Applicant). The GIS supports a planning application for the development of up to eleven wind turbines, battery energy storage system (BESS) and associated infrastructure (hereafter referred to as the 'Proposed Development') on land 2.7km to the north of Clatter (hereafter referred to as 'the Site'). The Site lies within the Powys County Council (PCC) administrative area.

1.1.2. This GIS should be read in conjunction with the accompanying Planning Design and Access Statement (PDAS), which sets out the justification for the Proposed Development in planning terms and the design rationale, the Environmental Statement (ES) plus the Net Benefit for Biodiversity (NBB) Report (See **Appendix C** of the GIS), which sets out an assessment of the likely significant environmental effects of the Proposed Development.

1.1.3. This GIS has been prepared in line with Planning Policy Wales Edition 12 (PPW12), which includes a requirement for a GIS to be submitted with all planning applications. The GIS is seen as an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site and how the step-wise approach has been applied (Paragraph 6.2.12). The GIS has also been informed by the 'Delivering High Quality Green Infrastructure in Wales' briefing paper published by Building with Nature (BwN) (November 2023) and 'Designing for Renewable Energy in Wales' published by the Design Commission for Wales (December 2023).

1.1.4. Green infrastructure is defined in PPW12, in Paragraph 6.2.1, as:

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

1.2 PURPOSE AND STRUCTURE OF THE STATEMENT

1.2.1. This GIS describes how GI has been incorporated into the design of the Proposed Development 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. The GIS is assessed against the BwN standards, which are set out within PPW12 (Paragraph 6.2.14) and represent good practice standards to ensure the potential of the Proposed Development is maximised in the sustainable management of natural resources.

1.2.2. The GIS is structured as follows:

- **Section 1: 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: Policy Context** – sets out the relevant local, national and regional policy and guidance;
- **Section 4: Scheme Strategy** – outlines the objectives, design strategy, and sets out the GI opportunities across the Proposed Development;
- **Section 5: Green Infrastructure Assessment** – assesses the Proposed Development against the BwN Standards Framework; and
- **Section 6: Conclusion** – demonstrates the positive contribution the Proposed Development makes to GI.

1.3 DEVELOPMENT OF THE GREEN INFRASTRUCTURE STATEMENT

1.3.1. This GIS follows PPW12 and Natural Resource Wales (NRW) guidance[1] on how to integrate and assess GI as part of the Proposed Development. The GI assessment methodology is summarised as follows:

- **Policy and guidance context**: a review of national, regional, and local policy has been carried out to ensure that the Proposed Development incorporates best practice and GI priorities;
- **Green infrastructure assets**: Contextual existing GI datasets from NRW's Data Map Wales/LANDMAP have informed the GI baseline for the Proposed Development;
- **Scheme development**: the Proposed Development seeks to demonstrate how it meets the Powys Green Infrastructure Assessment[2] criteria through a number of key objectives and design principles; and
- **GI assessment**: the BwN Standards Framework 2.0 has been used to assess the Proposed Development. The twelve standards shown in **Table 1-1** highlight a pathway for early and sustained engagement in the design, implementation and long-term stewardship of high-quality GI. These standards focus on opportunities to integrate existing and proposed habitat and wildlife at the centre of development. Each standard is presented in the form of questions, and these questions are used during the assessment to advise how the design meets the standards. It is noted that the Proposed Development is not pursuing official BwN Accreditation, but rather the BwN Standards Framework has been used as good practice to assess the GI priorities and opportunities.

[1] Natural Resources Wales (2021) Green Infrastructure Assessments: A Guide to Key Natural Resources Wales' Datasets and How to Use Them as Part of a Green Infrastructure Assessment (Guidance Note 042). [Online] Available at: https://naturalresources.wales/media/696780/gn042-green-infrastructure-assessments-final.pdf [Accessed April 2026].

[2] Powys County Council (2024) Powys Replacement Local Development Plan (LDP) 2022–2037: Green Infrastructure Assessment. [Online] Available at: https://ldp.powys.gov.uk/docfiles/36/Powys%20Green%20Infractructure%20Assessment_Final.pdf A[Accessed April 2026].

Table 1-1 – Building with Nature Standards

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 OVERVIEW OF THE PROPOSED DEVELOPMENT

2.1 THE SITE

2.1.1. The Site is located within the local authority area of PCC, on hills to the north of the A470 trunk road. It is approximately 2.7km north of the village of Clatter, 3.5km northeast of the village of Carno, 3.5km north of the village of Pontdolgoch and 12km northwest of Newtown.

2.1.2. The Site encompasses an area of approximately 381 hectares (ha) and is shown in **Figure 1.1 – Site Location Plan** (See Appendix A).

2.1.3. The Site and surrounding area's current land use is largely comprised of agricultural pasture used for livestock grazing, and is interspersed by hedgerows, existing access roads and pockets of woodland throughout. A review of the Wales Agricultural Land Classification (ALC) interactive map viewer suggests that the land mainly comprises Grade 4: poor quality agricultural land and Grade 5: very poor quality agricultural land. The southern-most section of the access track crosses Grade 3b and a small area of Grade 2 and Grade 3a land, which are classified as best and most versatile agricultural land. The affected section is only approximately 165m in length.

2.1.4. The Afon Carno is a Main River located approximately 2km south of the Site boundary. There are two ordinary watercourses, Nant y Llyn Mawr and Nant Cwmgerwyn, within the Site. The proposed access road also intersects a number of unnamed ordinary watercourses and tributaries of the Afon Carno.

2.1.5. Llyn Mawr Site of Special Scientific Interest (SSSI) is located partially within the southern extent of the Site boundary. The 20.1ha SSSI consists of an upland lake and associated wetland supporting habitat. The designated site is of ornithological importance and is extensively used by waterfowl. The immediate catchment of the lake within the designated site includes some bracken slopes, areas of gorse scrub, acid grassland, wet heath and mesotrophic marshland habitat. In summer typical species are mallard, tufted duck and goosander, whilst in winter species include whooper swan. The surrounding area is also used by wintering Greenland white-fronted geese.

2.1.6. There are a small number of isolated dwellings in proximity to the Site, the closest is located immediately south of the Site boundary, approximately 200m north of Llyn Mawr.

2.2 THE PROPOSED DEVELOPMENT

2.2.1. Parc Ynni Calon Y Gwynt Cyf is seeking planning permission for the construction and operation of a wind farm of up to eleven turbines, BESS and associated infrastructure.

2.2.2. The layout of the Proposed Development, incorporating maximum tip heights of up to 200m for ten turbines, and 180m for one turbine (T7), has been chosen because it balances wind yield potential with the environmental sensitivities present at the Site. The indicative output capacity of the Proposed Development at this stage is 80MW, however this capacity may vary subject to the final turbine model chosen. A full description is available in ES Chapter 4 – Description of the Proposed Development and further information on the Proposed Development is available in the accompanying Planning, Design and Access Statement.

2.2.3. The layout of the Proposed Development, including access tracks, temporary construction compound and BESS, is shown in **Figure 1.2 – Site Layout Plan** (See Appendix B).

3 CONTEXT

3.1 INTRODUCTION

3.1.1. The relevant national, regional and local GI planning policy has been summarised below. Further detail of all relevant policy is set out in the PDAS, to be read in conjunction with this GIS.

3.2 NATIONAL POLICY

FUTURE WALES – THE NATIONAL PLAN 2040

3.2.1. *Future Wales: The National Plan 2040* (referred to as "Future Wales" hereafter)[3] was adopted in February 2021 and sets out national policy and is the highest tier of the development plan against which DNS are assessed, to determine their ability to address the key national priorities. These include developing and sustaining a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of communities.

3.2.2. The policies of relevance to the GIS are:

- **Policy 9 'Resilient Ecological Networks and Green Infrastructure'** – *"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"*;
- **Policy 17 'Renewable and Low Carbon Energy and Associated Infrastructure'** – *"in Pre-assessed Areas (PAA) for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in Policy 18" and that "proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities";* and
- **Policy 18 'Renewable and Low Carbon Energy Developments of National Significance'** – *"the proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity".*

PLANNING POLICY WALES

3.2.3. PPW12[4] sets out the land use planning policies of the Welsh Government, with the primary objective of the document being to ensure that the planning system contributes to the delivery of sustainable development, improving the social, economic, environmental and cultural well-being of Wales.

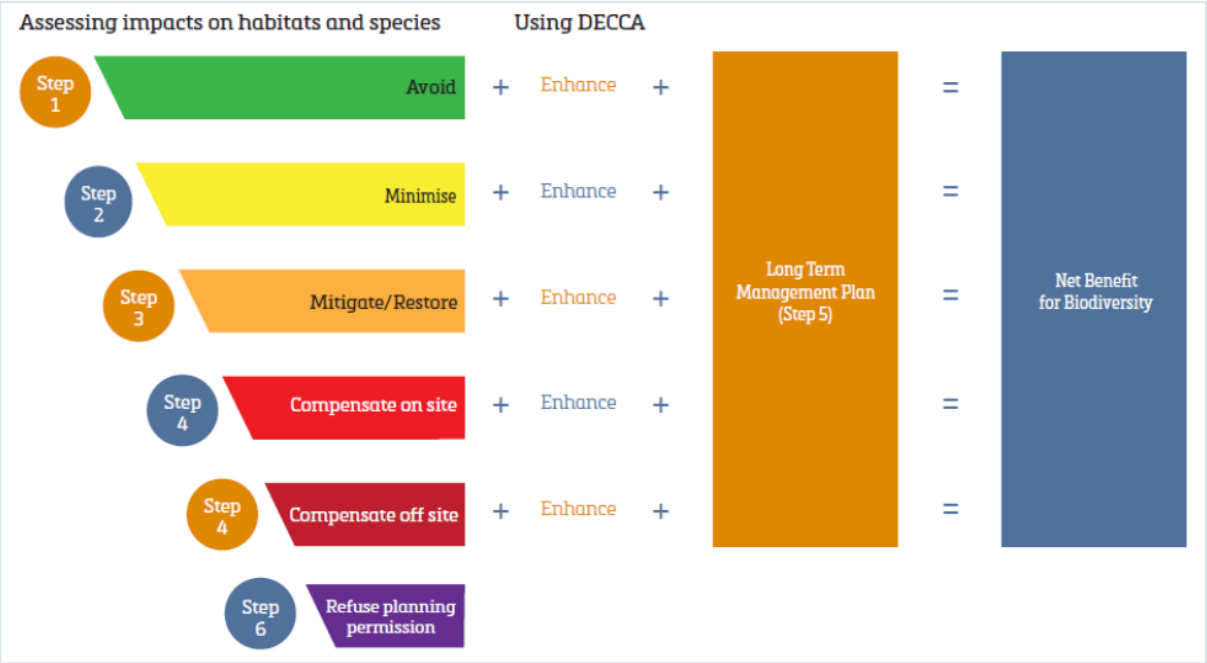
[3] Welsh Government (2021) Future Wales: The National Plan 2040. [Online] Available at: https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf [Accessed April 2026]

[4] Welsh Government (2024) Planning Policy Wales. [Online] Available at: https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf [Accessed April 2026]

3.2.4. PPW12 introduced new policy in relation to GI, securing net benefit for biodiversity, strengthening protection of SSSIs and promoting new tree planting. More detail on these changes is provided below:

- **Green Infrastructure** – GI assessment policy text was strengthened, with Local Planning Authorities given additional responsibilities to adopt a strategic and proactive approach to GI. Paragraph 6.2.12 of PPW12 notes that a proportionate GIS should be submitted with all planning applications. This should highlight any baseline data considered, and surveys and assessments undertaken, including habitats 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, where enhancement and long-term management should be considered at each step. The use of GIS as a means of demonstrating the step-wise approach is explicit. The diagram which provides a summary of the approach in PPW12 is shown in **Plate 3-1**.
- **Protection for SSSIs** – PPW12 aims to strengthen the protections afforded to SSSI areas. It states that development in an SSSI must be avoided, unless necessary for the management of the site, with presumption against development likely to damage an SSSI. However, paragraph 6.4.27 notes that development may be approved in exceptional circumstances and where considered appropriate, where not likely to damage the SSSI with broad and clear mitigation and enhancement provided as part of the development.
- **Trees and Woodland** – 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 of greenery is unavoidable, compensation will be required through replacement planting.

Plate 3-1 – Step-wise Approach from PPW12



TECHNICAL ADVICE NOTE 5: NATURE CONSERVATION AND PLANNING (2009)

3.2.5. This Technical Advice Note (TAN) [5] provides advice on how the land-use planning system should contribute to protecting and enhancing biodiversity and geological conservation.

3.2.6. In relation to GI, the TAN states that development policies and supplementary planning guidance should promote opportunities for the incorporation of wildlife and geological features within the design of the development.

3.2.7. This TAN also sets out the key principles for planning for nature conservation, provides advice for the preparation and review of development plans, including relevant statutory requirements, and addresses nature conservation in development control procedures. It also deals with the conservation of internationally, nationally and locally designated sites and habitats and also the conservation of protected and priority species.

3.3 LOCAL PLANNING POLICY

3.3.1. The Proposed Development is located within the administrative area of Powys County Council (PCC). PCC adopted its Local Development Plan (LDP) [6] in April 2018. The document was intended to apply up to March 2026 but remains the current applicable plan subject to the finalisation and adoption of the Council's Replacement Local Development Plan 2022-2037. **Table 3-1** summarises the policies considered to be of particular relevance to GI and the Proposed Development.

Table 3-1 – Powys County Council LDP Policies

Policy Title	Summary
Strategic Policy SP7 – Safeguarding of Strategic Resources and Assets	Safeguards important strategic resources and assets to protect them for the future well-being of Powys. Development proposals shall only be permitted where they do not have an unacceptable impact, including cumulative impacts, on assets or resources.
DM2 – The Natural Environment	Stipulates that proposed development should demonstrate how they protect, manage and enhance biodiversity and geodiversity. As part of this mandate, proposals should not unacceptably harm the integrity of European, national and locally designated sites, habitats and species. Permission may be granted subject to imperative reasons of over-riding public interest and appropriate compensatory measures.
DM6 – Flood Prevention Measures and Land Drainage	Stipulates that development that unacceptably increases flood risk shall be refused. In areas at risk of flooding, opportunities should be taken to improve natural land drainage.
DM13 – Design and Resources	Stipulates that new developments shall be of high quality, sustainable design which provide usable, safe, durable and adaptable places, and protect local character and distinctiveness of the Plan Area's built historic and natural environment. Of particular importance for GI, the proposed development must "*complement and/or enhance the character of the surrounding area*" and provide "*appropriate landscaping and planting*".

[5] Welsh Government (2009) Technical Advice Note 5: Nature Conservation and Planning. [Online] Available at: https://www.gov.wales/sites/default/files/publications/2018-09/tan5-nature-conservation.pdf [Accessed April 2026]

[6] Powys County Council (2018) Powys Local Development Plan 2011-2026. [Online] Available at: https://en.powys.gov.uk/article/4898/Adopted-LDP-2011---2026 [Accessed April 2026]

3.3.2. PCC published guidance on Green Infrastructure Assessment (GIA)[7] in August 2024 as part of the Replacement LDP 2022-2037. Although the Replacement LDP has not been finalised and adopted, the GIA is a material consideration to the decision-making process. This GIS has been prepared to satisfy the requirements of the GIA.

3.3.3. The GIA provides the guiding principles to support the creation of a multifunctional GI network, which supports and improves health and wellbeing, the economy, nature and biodiversity, contributes to tackling climate change and crucially, meets the needs of the local population. The document sets out a vision for Green Infrastructure and identifies the following key priorities of GI assessment:

- Protect, enhance, create and restore habitats to create a resilient wildlife and biodiversity network;
- Enable a thriving blue environment;
- Promote sustainable growth and economic development through GI;
- Encourage, enable and promote healthy lifestyles and enhance wellbeing; and
- Improve connectivity.

3.3.4. It quotes the definition given in PPW12 of GI as "*the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places*".

3.3.5. The GIA notes that GI "*functions on a variety of different scales and components*", from landscape scale which encompasses entire ecosystems, down to individual interventions, such as hedgerows and singular trees.

3.3.6. The GIA states that GI "*can provide benefits across social, economic, cultural and environmental sectors, often simultaneously*". Examples given are flood management, improved air quality, reduced noise pollution, climate change mitigation, as well as improved health and wellbeing and greater sense of place. Having a stronger, more well-connected network of GI produces a better environment.

3.3.7. The GIA has been considered in the evolution of the Proposed Development's design and mitigation strategy.

3.4 GREEN INFRASTRUCTURE ASSETS

3.4.1. PPW12 paragraph 6.12.13 states that GISs should highlight the baseline data considered, along with the surveys and assessments undertaken to establish such baseline. These are described in ES Chapter 5 – Ecology.

3.4.2. The baseline data conditions were carried out separately for the main site and the access road for the Proposed Development. The main site conditions were informed by the following:

[7] Powys County Council (2024) Green Infrastructure Assessment. [Online] Available at: https://ldp.powys.gov.uk/docfiles/36/Powys%20Green%20Infractructure%20Assessment_Final.pdf [Accessed June 2026]

- Preliminary Ecological Appraisal, based on:
  - Ecological desk study;
  - Extended Phase 1 Habitat Survey;
  - Daytime Bat Walkover;
  - Habitat Suitability Index Assessment; and
  - Protected/Notable Species Assessment.
- National Vegetation Classification Survey Report;
- Main Site Aquatic Walkover;
- Bat Activity Survey Report;
- Badger Survey Report;
- GCN (Great Crested Newt) Survey Report;
- Reptile Report;
- Riparian Mammal Report; and
- Habitat Regulations Assessment Likely Significant Effects Report.

3.4.3. The access road conditions were informed by the following:

- Preliminary Ecological Appraisal, based on the same assessments and surveys as detailed above;
- Initial bat survey update note;
- Badger Survey Report;
- Dormouse Survey Report;
- Riparian Mammal Report;
- Bat Ground Level Tree Assessment Survey Report; and
- Habitat Regulations Assessment Likely Significant Effects Report.

3.4.4. Additionally, ornithology baseline conditions are described in ES Chapter 6 – Ornithology. This was informed by:

- Vantage Point Surveys;
- Breeding Raptor Surveys;
- Breeding Wader Surveys;
- Llyn Mawr Waterbody Counts;
- Winter Walkover Surveys; and
- Nightjar Surveys.

3.4.5. A summary of the GI assets is provided below.

Biodiversity

3.4.6. A small portion of the Site is covered by the Llyn Mawr SSSI and the Llyn Mawr Wildlife Trust Reserve, at the southern extent. **Table 3-1** below summarises the statutory and non-statutory designated biodiversity sites within the ES 30km desk study area and their key attributes.

Table 3-2 – Statutory and Non-Statutory Designations

Designation	Nature Conservation Importance	Approximate Distance from the Site and Key Attributes
Coedydd Llawr-y-glyn SAC	International	7.6km southwest. Designated for the presence of old sessile oak Quercus petraea woods with Ilex and Blechnum in the British Isles
Berwyn SPA	International	16km northwest. Designated for the presence of hen harrier, merlin, peregrine falcon and red kite.
Elenydd-Mallaen SPA	International	20km southwest. Designated for the important breeding populations of red kite, merlin and peregrine falcon.
Tanat and Vyrnwy Bat Sites/Safleoedd Ystlumod Tanat ac Efyrnwy SAC	International	23 km northeast. Designated for presence of lesser horseshoe bats Rhinolophus hipposideros.
Coedydd Derw a Safleoedd Ystlumod Meirion/Meirionnydd Oakwoods and Bat Sites SAC	International	29 km northwest. Designated for the presence of lesser horseshoe bats. Designated for the presence of old sessile oak Quercus petraea woods with Ilex and Blechnum in the British Isles, and alluvial forests with Alnus glutinosa and Fraxinus excelsior. Additional Annex I habitats that are present as a qualifying feature are water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation, Northern Atlantic wet heaths with Erica tetralix, European dry heaths, Tilio-Acerion forests of slopes, screes and ravines, and bog woodland.
Llyn Mawr SSSI	National	Within the Site. An upland lake partially modified by agricultural improvement with marginal vegetation. Ornithological importance for waterfowl such as whooper swan Cygnus cygnus and Greenland white-fronted geese Anser albifrons. Botanically rich habitats surround the lake catchment.
Gregynog SSSI	National	6km east. This site supports foraging lesser horseshoe bats.
Llyn Mawr Wildlife Trust Reserve	County	Within the Site. Llyn Mawr Wildlife Trust Reserve has the same extent as Llyn Mawr SSSI, and therefore supports the same habitats and species, comprising aquatic plants, waterfowl, dragonflies and damselflies, and associated wetland habitats. It is understood that the Reserve is currently closed to public access.
Llyn Du Wildlife Site	County	0.5 km south. Upland lake.
Grofftydd Road Verge Nature Reserve	County	1.2 km south-west. Designated by Montgomeryshire Wildlife Trust as part of the 'Living Highways Project' with the aim to recognise the ecological value of road verges.
B-Line	Local	Partially located within the Site. A locally important insect pollinator dispersal pathway, between areas of existing wildflower-rich habitat.

3.4.7. ES Chapter 5 – Ecology sets out an assessment of likely effects on tree and hedgerow habitats and identifies likely mitigation, compensation or management requirements; ES Chapter 6 – Ornithology does similar for birds.

National Landscape Character

3.4.8. The Proposed Development is located within the north-eastern fringes of NRW's National Landscape Character Area (NLCA) 21: NLCA 21: Cambrian Mountains[8]. This covers an "*extensive upland plateau, being an inland spine that divides western and eastern river catchments and forms one of the most extensive and tranquil areas of Southern Britain*". The key characteristics of this NLCA are as follows:

- "*Upland plateau - A band of resistant Silurian grits forming a vast upland, rolling, windswept plateau of moorland hills and incised valleys at the heart of Wales.*
- *Deep valleys and glacial features - Glaciation gouged deeply dissected U-shaped valleys into the plateau, as well as corries (cymoedd), lakes and moraines.*
- *Open moorland and forestry - Thin soils support extensive tracts of sheep grazed grassy moorland – the smooth slopes are interspersed with bracken scrub, wind blown oaks and angular blocks of coniferous forestry.*
- *Peat bogs, pools - Upland peat deposits give rise to large areas of blanket bog and pools of open water.*
- *Hedgerow enclosed pastures - Deep valleys on the edges of the moorland, with their distinctive pattern of hedgerow enclosures, lush pastures for stock grazing, and woodland.*
- *Major reservoirs – notably Nant-y-Moch, Llyn Clywedog, Craig Goch, Penygarreg, Garreg-ddu, Claerwen and Llyn Brianne are features of the valleys, contributing to the landscape's man-made features.*
- *Mineral exploitation - Metal ores have been exploited from the prehistoric period with evidence for Bronze Age copper working at Copa Hill, however, most activity relates to extensive lead and silver mining which occurred principally during the 19th and 20th centuries.*
- *Lack of settlement - Settlement is largely absent, being confined to the lower hillsides and valleys, however, a large number of deserted settlements indicate that settlement was once more widespread than today.*
- *Natural features - Screes and cliffs, gritstone outcrops, stony summits, bracken scrub and wind blown oaks provide texture in the landscape. Panoramic views - from high summits over the moorlands and adjacent lowlands are a feature of the hills.*
- *Tranquil - The mountains engender a sense of remoteness because of their dark nighttime skies, low population density, relative inaccessibility, the impression of naturalness they impart and the relative lack of visible, built influences.*

[8] Cyfoeth Naturiol Cymru/Natural Resources Wales (2014) NLCA21 Cambrian Mountains. [Online] Available at: https://naturalresources.wales/media/682592/nlca21-cambrian-mountains-description.pdf [Accessed June 2026]

- *Archaeology - The mountains contain a significant scattering of prehistoric monuments, including round barrows, cairns, stone circles and standing stones, Iron Age hillforts and settlements. The fort at Cae Gaer indicates* a Roman presence, while the Cistercian abbey of Strata Florida was established on the west side of the mountains in the late 12th century. Its granges covered much of this area as well as part of lowland Ceredigion."

LANDMAP

3.4.9. LANDMAP provides an all-Wales resource of landscape characteristics, qualities, and influences, arranged within five aspect layers: Geological Landscape, Landscape Habitats, Visual and Sensory, Historic Landscape and Cultural Landscape.

3.4.10. An assessment of the effects of the Proposed Development on LANDMAP Aspect Areas is set out in ES Chapter 7 (Landscape and Visual). The selection of LANDMAP Aspect Areas to be included in the LVIA has been carried out in accordance with the methodology provided in Using LANDMAP in Landscape and Visual Impact Assessments.

3.4.11. The Site is located outside the Eryri National Park, Proposed Glyndŵr National Park, and Shropshire Hills National Landscape and there are a number of Special Landscape Areas within proximity of the Site.

Water Environment

3.4.12. The Site is largely covered with grassland, with rough grassland interspersed with areas of bracken, especially in the north and western areas. There are areas of marsh in the westerly quadrant surrounding the headwaters of the watercourses draining the Site. The southern section of the Site passes by the occurrence of deciduous woodland which tend to form corridors along the streams and field boundaries.

3.4.13. There are three watercourses and several smaller tributaries in the vicinity of the Site. The Afon Carno is located to the south of the Site and the Nant Cwmgerwyn to the west of the Site. The Afon Carno is classified by NRW as a Main River and the Nant Cwmgerwyn is classified as an Ordinary Watercourse.

3.4.14. Two springs draining into the Afon Carno valley were also identified approximately 400m north from the Nant Big's confluence with the Afon Ebwy.

3.4.15. The Nant y Llyn Mawr is located in the northeast of the Site and is connected to Llyn Mawr. The Nant y Llyn Mawr flows north and crosses the existing access track before bending northeast through a steep sided before joining the Afon Rhiw and through a caravan park before joining the Afon Rhiw approximately 2.5km northeast of the Site.

3.4.16. There are two springs located within the Site. Both are situated along the existing access road connecting the Main Site of Proposed Development to the B4568 (NGR: SO012966 and SO012960). Both springs flow south eastwards away from the Site and will not be affected by the Proposed Development.

3.4.17. Additionally, there are four springs in the vicinity of the Site. One is located approximately 0.95km to the east of the Site, approximately 0.41km south of Llyn Tarw, and flows south before joining the Nant Rhyd-ros-lan. The second spring is located approximately 0.37km east of Llyn Du and flows south before joining an ordinary watercourse which confluences with the Afon Carno. The third spring is located approximately 0.43km east of the Site and flows northwest before joining an

ordinary watercourse which confluences with the Nant Rhyd-ros-lan. The fourth spring is located approximately 1.04km east of the Site and flows northeast before joining an ordinary watercourse which confluences with the River Severn.

3.4.18. A Flood Consequence Assessment (FCA) has been prepared and is included as Appendix 9A to the ES. With regard to fluvial 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, based on the tidal extents and the site topography, the locality is not determined to be at risk of tidal flooding.

3.4.19. The risk of surface water flooding has been assessed as generally low, however there are a number of narrow corridors of high risk associated with ditches and minor watercourses which cross parts of the Proposed Development.

3.4.20. Further information can be found in ES Chapter 9 – Hydrology.

4 SCHEME STRATEGY

4.1 OBJECTIVE AND DESIGN STRATEGY

4.1.1. The design of the Proposed Development is based upon the intention to provide a scheme that provides a source of renewable energy to support the energy needs of Wales, without significant negative effects on the environment. To achieve this, the Proposed Development has been designed and located to:

- Ensure carbon emissions are reduced;
- Secure the greatest amount of wind energy which can be harvested from the site;
- Ensure visual impacts on the surrounding area are minimised; and
- Ensure no unacceptable impacts upon the residential and environmental amenity in and around the Site.

4.1.2. 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 a BESS.

4.1.3. The wind farm shall be designed with an operational life of 40 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 which a further planning consent would be required). For the purposes of the GIS assessment, it is assumed that the wind farm would be decommissioned.

4.1.4. The layout of the Proposed Development has been chosen because it balances high productivity with the environmental sensitivities present at the Site.

4.1.5. Further information in relation to the design evolution of the Proposed Development is provided in the ES and the PDAS which accompanies the application.

4.2 ENVIRONMENTAL MEASURES

4.2.1. A range of embedded environmental measures are proposed as part of the development, to mitigate against the environmental impacts. These are detailed within the ES. A number of measures of key relevance to this statement are summarised below.

Biodiversity

4.2.2. A Construction Environment Management Plan will be implemented throughout the construction phase of the Proposed Development. The CEMP will consolidate all appropriate embedded measures, and additional mitigation and enhancement strategies where required, and would clearly outline what should be implemented, where, and by whom. An Outline CEMP is provided alongside the ES. The final CEMP will be secured by way of a suitably worded planning condition on any permission granted.

- A Construction Method Statement will be prepared which sets out the following:
- Ground Investigation methods including appropriate reference to the CEMP;

- Turbine and infrastructure locations following post GI micro-siting involving a number of technical specialists;
- Good practice guidance relevant to H&S, design details etc;
- Design detail for infrastructure (e.g., foundation specification, foundation and crane hardstanding configuration, confirmation of track sections to be excavated, external finish to buildings, security fencing form and location, etc);
- Design detail for pollution control measures (location specific arrangements and design for management of dewatering activities);
- Material import requirements and confirmation of stone and concrete source;
- Programme of works and working hours controls; and
- Site restoration plan to be implemented to restore areas affected by construction activity.

4.2.3. A Habitat Management Plan (HMP) would be produced and would include the location and approach to implementing ecological and other enhancements and mitigation where applicable. An Outline HMP is provided as part of the ES. The approval of the final HMP will be subject to a suitably worded planning condition on any permission granted.

4.2.4. Particular care would be required to maintain dust emissions at a practicable minimum when working in the vicinity of residential properties and environmentally sensitive areas. Good practice mitigation would be required during dry conditions. The use of Best Practicable Means (as defined in Part III of the Environmental Protection Act 1990) would be employed.

4.2.5. Site waste management practices to be implemented by the appointed contractor for the construction works for the Proposed Development are included in the Outline CEMP and will be secured in the Final CEMP.

4.2.6. An independent Ecological Clerk of Works (ECoW) will be appointed prior to the commencement of construction and will be present on site during enabling works and throughout the construction period. They will be a suitably experienced individual, whose role will be to oversee that all works are carried out in accordance with environmental legislation and good practice, and with agreed construction phase management plans, such as the CEMP.

Ornithology

4.2.7. Preconstruction surveys during the breeding season (March to August inclusive) will highlight any nesting bird species and demarcation fencing will ensure appropriate standoff distances maintained to avoid disturbance and contravention of legislation. If suitable buffer distances cannot be maintained from Schedule 1 nesting species (such as red kite) then works in the vicinity will have to cease temporarily until any young birds have fledged. The outcome of all recorded nests will be recorded by the ECoW and included in an annual report.

4.2.8. Any active bird nests found will be cordoned off to a suitable distance for the species concerned (in line with appropriate guidance) and construction operations delayed within the cordon until the young have fledged and/or the nest becomes vacant naturally.

4.2.9. All groundworks will be undertaken outside of the breeding season (March – August inclusive) where practicable to avoid impacts to breeding birds.

Water Environment

4.2.10. 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.

4.2.11. 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 9A of the ES) secured by planning condition.

5 GREEN INFRASTRUCTURE ASSESSMENT

5.1 DEMONSTRATING THE STEP-WISE APPROACH

5.1.1. Paragraphs 6.4.5 to 6.4.17 of PPW12 set out the requirements for NBB and how to demonstrate that the step-wise approach (as shown in **Plate 3-1**) has been applied.

5.1.2. It states in Paragraphs 6.4.11-6.4.12 of PPW 12 that:

5.1.3. *"Planning authorities must follow a step- wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.*

5.1.4. *Having worked iteratively, in line with Figure 12, through the stages of the step-wise approach below, and providing evidence in the Green Infrastructure Statement that the step-wise approach has been followed, a scheme of enhancements must be provided to ensure a net benefit for biodiversity. Where biodiversity enhancement proportionate to the scale and nature of the development is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise, it will be necessary to refuse permission".*

5.1.5. The specific details of the Step-Wise Approach are contained in Paragraph 6.4.15 of PPW12.

5.1.6. Footnote 129 on Page 149 also states:

5.1.7. *"Habitats, including the natural resources which underpin them, which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. Examples include, ancient woodland and veteran trees, ancient hedgerows, wet woodlands, sand dunes, peatland, species rich grassland, long undisturbed soils, blanket bog, salt marsh and lowland fen".*

5.1.8. The key aspects of the step-wise approach and a summary of the measures proposed for implementation as part of this approach are set out in **Table 5-1** below, the oHMP and Net Benefit for Biodiversity (NBB) Report.

Table 5-1 – Step-wise Approach in relation to the Proposed Development

Assessing the Impacts on Habitats and Species Step-wise Approach	Measures Proposed for Implementation
Step 1 – Avoid	In terms of Step 1a) (i.e. avoiding damage to biodiversity in the wider sense) the iterative design process of the Proposed Development has been undertaken to inform the Site layout to avoid loss of key habitats on Site. The retention and protection of habitats was particularly considered for Priority Habitats (lowland mixed deciduous woodland, montane heaths and grassland, blanket bog, upland heathland, inland rock outcrops and scree habitats, native hedgerows, small, medium altitude rivers on acidic geology and ponds).

Assessing the Impacts on Habitats and Species Step-wise Approach	Measures Proposed for Implementation
	Through careful design, land take of pond habitat has been avoided and removal of other classifications have been limited, with the full list available in Table 5-1 of the Net Benefit for Biodiversity (NBB) Report (See Appendix C), with infrastructure generally located within improved grassland, semi-improved grassland and areas of arable land. A minimum 50m stand-off between all turbine blade tips and the nearest point of linear/foraging features likely to be well-used by bats has been incorporated, as well as a minimum 200m distance between any turbine and areas considered to be of medium or high potential to support roosting bats. Where existing tracks are available, these have been incorporated into the Proposed Development layout to avoid unnecessary creation of new tracks and consequent damage to habitat. The Site also avoids direct impacts on all statutory designated sites. Whilst a SSSI is located within the application site boundary, it is avoided by physical development. Habitats within SSSI designations have also been avoided. Light spill on any retained/boundary habitats has been avoided, as detailed in the Outline CEMP. The access road has been routed a minimum of 100m away from potential otter holts. In respect of Step 1b) and the issue of 'irreplaceable habitats' specifically, it is acknowledged that there is potential for the Proposed Development to impact via the existing historic access track which runs on the Ancient Woodland designation at Coed Yr Henblas, as well as blanket bog within the Site. However, as detailed below in Paragraphs 5.1.14 and 5.1.18 respectively, the impacts will be minimised and/or compensated for in terms of Ancient Woodland and mitigated in terms of blanket bog. Also, as detailed in Section 5.6 of the PDAS, the significant benefits of the scheme in terms of renewable energy generation to meet net zero targets means that there are "wholly exceptional" circumstances to potentially grant the Proposed Development. On this basis, it is considered that the Applicant has demonstrated that they have complied with the requirements of Step 1b.
Step 2 – Minimise	Boundary features, such as hedgerows and treelines, have been retained as far as possible. This will ensure that the connectivity of the Site is maintained and will benefit commuting and foraging species such as bats and small mammals and will also provide a food source for species such as dormice. A Precautionary Method of Works (PMoW) shall be produced prior to commencement of works, ensuring Site conditions have not changed and that no additional ecological receptors require consideration before the commencement of works. This shall minimise impacts to ecological receptors. An Ecological Clerk of Works (ECoW) shall be employed during construction to ensure compliance with the Outline CEMP. Vegetation clearance of habitats considered suitable to support dormice, reptiles and amphibians will be supervised by the ECoW. Contractors shall be provided with a Toolbox Talk (TBT) which shall describe biodiversity considerations on Site, and what considerations

Assessing the Impacts on Habitats and Species Step-wise Approach	Measures Proposed for Implementation
	should be taken. This shall ensure everyone working on site is aware of and implementing actions to minimise impact on these considerations. The Outline CEMP will also set out various working practices and methods which will ensure working to best environmental practices. This will include measures to prevent surface water run-off/hydrological pollution events and other pollution events. There will also be measures to prevent the entrapment of animals and vehicle movements will be restricted to daylight hours as far as possible, with speed limits in place to reduce the risk of wildlife/traffic collisions. Construction materials and cleared vegetation shall be stored appropriately to minimise risk of animals moving onto the active construction site. Where there is proposed permanent impact to streams, culverts will be installed sympathetic to fish passage, minimising disturbance to commuting activities. Where relevant, works will be carried out under a European Protected Species Licences (EPSL). Licences will be sought for GCN, dormice and for bats (should roosts be identified during the scheduled bat surveys within suitable trees along the access road).
Step 3 – Mitigate / Restore	Hydrological enhancements in the form of ditch blocking to support existing areas of montane heaths and grasslands and blanket bog within areas of peaty soils. Bracken clearance within areas of the Site which are considered suitable to be restored to, for example, species-rich acid grassland or heathland. Through management, cleared bracken habitats have the potential to support an increased species diversity. Removal/management of grazing pressures to increase diversity of sward structure and species composition within grassland habitats on Site. This could comprise measures such as changes in stock management through the introduction/removal of fence lines. Further mitigation measures are detailed in the oHMP, the Outline CEMP, and the NBB Report. In relation to the blanket bog specifically, it should be noted that the 'floating' access track would mitigate any potential impacts to the buried peat and is an accepted form of mitigation on other windfarm developments.
Step 4 – Compensate on-Site	The following enhancement ratios have been set out within the NBB Report (See Appendix C): Trees: 3:1 Priority Habitats: 4:1 Non-priority habitats: 2:1 Dormouse nest boxes are likely to be included as part of the dormouse EPSL method statement which is yet to be produced and will confirm number and locations. Bat boxes may also be used should they be required to replace any existing roosting sites under EPSL methodology. In respect of Ancient Woodland specifically, it is acknowledged that this is an 'irreplaceable habitat' and therefore replacement planting in the form of mitigation is not an option. Nevertheless, compensation measures have

Assessing the Impacts on Habitats and Species Step-wise Approach	Measures Proposed for Implementation
	been outlined within the oHMP. Such measures include enhancing other areas of woodland through coppicing and managed thinning and improving woodland connectivity by planting at the edge of the Ancient Woodland.
Step 5 – Compensate off-Site	At this stage there is no anticipated off-Site compensation required.

5.1.9. Overall, the adherence to the Step-wise approach, with the assurances and procedures set out in the CEMP, HMP and CMMP ensures the Proposed Development is in accordance with policy on Green Infrastructure and demonstrates the commitment to delivering net benefit for biodiversity.

ANCIENT WOODLAND

5.1.10. The Proposed Development would result in a maximum loss of 0.43 ha of the 6.30ha area designated as Ancient Woodland at Coed yr Henblas due to the potential widening of an existing historic track (pre-dating the Ancient Woodland designation) to facilitate access to the Site. Ancient Woodland is listed under Footnote 129 of PPW 12 as an example of irreplaceable habitat. Step 1b) explains that statutory designated sites and those that are 'irreplaceable' form the heart of resilient ecological networks and their role and the ecosystem services they provide must be protected, maintained and enhanced, and safeguarded from development. Development would only be considered justifiable in wholly exceptional circumstances.

5.1.11. As set out in the PDAS and Chapter 3 (Scheme Need, Alternatives and Iterative Design Process) of the ES, the access road alignment has undergone multiple iterations, driven by engineering considerations to avoid or minimise impacts on sensitive environmental receptors and irreplaceable habitats as far as practicable. The Applicant considers that the strong policy support within Future Wales, PPW 12 and the PCC LDP for renewable energy development, aligned with Wales' international commitments and targets on climate change and net zero.

5.1.12. As detailed in Section 5.6 of the PDAS, the significant benefits of the scheme in terms of renewable energy generation to meet net zero targets means that there are "wholly exceptional" circumstances to grant the Proposed Development. On this basis, it is considered that the Applicant has demonstrated that they have complied with the requirements of Step 1b).

5.1.13. Accordingly, taking all relevant considerations into account, including the strong policy support within Future Wales, PPW 12 and the PCC LDP for renewable energy development, the significant benefits of the Proposed Development, and the proposed compensation measures, these are considered to outweigh the loss of a small area of the Ancient Woodland and therefore the Proposed Development is justifiable under the terms of Step 1b).

BLANKET BOG

5.1.14. Similar to Ancient Woodland, blanket bog is also listed under Footnote 129 of PPW 12 as an example of 'irreplaceable habitat'. Whilst it has largely been avoided, it is recognised that three discrete areas of moderate to good condition blanket bog (10.1% of identified blanket bog within the Site) will be subject to permanent removal as a result of the Proposed Development. Measures are detailed in the Outline Habitat Management Plan (oHMP) to mitigate the effects of construction, including the use of 'floating' access tracks to ensure the peat below is retained in-situ. Habitats

identified as being suitable to restore areas of blanket bog are adjacent to existing areas of blanket bog or within sensitive soils or peaty soils, with an appropriate hydrological regime. Furthermore, habitat enhancements across the wider Site will go towards mitigating for the loss of blanket bog habitats.

5.1.15. As detailed in Section 5.6 of the PDAS, the significant benefits of the scheme in terms of renewable energy generation to meet net zero targets means that there are “wholly exceptional” circumstances to potentially grant the Proposed Development. On this basis, it is considered that the Applicant has demonstrated that they have complied with the requirements of Step 1b).

5.1.16. Accordingly, taking all relevant considerations into account, including the strong policy support within Future Wales, PPW 12 and the PCC LDP for renewable energy development, the significant benefits of the Proposed Development, and the proposed mitigation and compensation measures, these are considered to outweigh the loss of a small area of the blanket bog and therefore the Proposed Development is justifiable under the terms of Step 1b).

5.1.17. Taking all relevant considerations into account, including policy support, the benefits of the Proposed Development, and the proposed mitigation and compensation measures, these are considered to outweigh the loss of the blanket bog and therefore the Proposed Development is justifiable under the terms of Step 1b).

5.2 DECCA FRAMEWORK

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

- Diversity between and within ecosystems;
- The extent or scale of ecosystems;
- The condition of ecosystems including their structure and functioning;
- The connections between and within ecosystems; and
- Adaptability of ecosystems including their ability to adapt to, resist and recover from a range of pressures likely to be placed on them through climate change for example.

Diversity

5.2.2. The step-wise approach adopted has sought to avoid and minimise impacts relating to biodiversity (as far as feasibility possible). Implementation of the oHMP will encourage diversity between ecosystems through the retention and creation of habitats/features proposed over the lifetime of the Proposed Development.

Extent

5.2.3. Steps to avoid and reduce loss of sensitive habitat have been included throughout the iterative design process.

5.2.4. The habitat enhancement proposals and long-term management of the site highlighted within the oHMP will increase the resilience of existing habitats. Potential habitat creation shall focus on increasing the extent of, and links between, high quality habitat and features.

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. Strengthening of existing habitats will establish higher-quality habitats, such as reducing scrub prevalence or increasing species diversity. Increasing the diversity of the sward structure and the species composition will further establish higher-quality habitats.

Connectivity

5.2.6. Enhancement measures shall increase potential connectivity between the Site and adjacent habitats, as will the creation of new habitat. Retaining linear features, such as hedgerows and lines of trees, maintains wildlife corridor connectivity.

5.2.7. The oHMP, specifically Table 4-1, quantifies the proposed management units and the proposed habitat management which shall strengthen connectivity, summarised below:

- 57.5 Ha of heathland habitat, removal of bracken and maintenance of grazing pressures;
- 15.1 Ha of marshy grassland, ditch blocking, removal of grazing pressures and removal of bracken;
- 19.3 Ha of neutral grassland/acid grassland/marshy grassland, reduction of grazing pressures and removal of bracken;
- 2.9 Ha of tree lines and hedgerows, planting and hedgerow widening; and
- 3.0 Ha of Rush pasture/marshy grassland/neutral grassland, rush cutting.

Adaptation

5.2.8. The stepwise approach has been applied to ensure that loss of habitat is primarily 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 oHMP, to ensure the Site adapts cohesively to the implemented measures.

5.2.9. The proposed mitigation measures would ensure that the site condition is retained and enhanced in such a way that biodiversity of the site is increased. The biodiversity net benefit secured by such measures would be unlikely to occur in the absence of the Proposed Development.

5.3 BUILDING WITH NATURE FRAMEWORK

5.3.1. PPW12 establishes the requirement that planning applications should demonstrate proportionate GI and refers to the BwN Standards as good practice.

5.3.2. BwN is for all those engaged in placemaking who want to create better places for nature and people to thrive. The evidence-based framework uses 12 quality standards to collectively define what good GI looks like. The purpose of the framework 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. Assessment against the BwN Standards Framework offers a means of recognising and valuing what the Proposed Development brings in terms of 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 set out in the tables below, with explanatory text and references to the supporting evidence, demonstrate how the standard is being met.

Table 5-2 – Building with Nature Core Standards

BwN Standard	Evidence	Assessment
Standard 1: Optimises Multifunctionality and Connectivity – the green infrastructure optimises multifunctionality and connectivity within the boundary of the project and links with the existing and planned for green infrastructure in the surrounding area.	Planning Design and Access Statement Environmental Statement: Chapter 3 - Consideration of Alternatives, Chapter 4 - Description of the Proposed Development, Chapter 5 – Ecology, and Chapter 6 – Ornithology Outline Construction Environmental Management Plan Outline Habitat Management Plan	The mitigation also demonstrates how the Proposed Development exists within and supports multifunctional GI. An assessment of the site's wider context also formed a key part of the site selection process. Further details regarding the site selection process and the factors considered are set out within the PDAS. The siting of infrastructure maintains the connectivity of GI, while wind energy development is compatible with GI.
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.		The Proposed Development itself shall provide a source of renewable energy that shall support the needs of Wales and contribute to meeting Climate Change objectives. The scale of the Proposed Development, with an indicative capacity of 80MW, shall help to meet national wind priorities and ensure that Wales continues to meet net zero targets, by replacing energy generation from fossil fuels.
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.		The Proposed Development has been designed to make the most effective use of land for wind power generation. As such, it is proposed to be located in an elevated area where there is excellent wind resource, identified as a PAA by the Welsh Government as a suitable location to support wind farm development, with the siting of the turbines developed to ensure wind intake is not diminished.

Standard 4: Champions a Context Driven Approach – the green infrastructure positively responds to the local context, including the physical environment, such as landscape and urban character and social, economic and environmental priorities, including the evidenced needs and strengths of existing and future local communities.		The Proposed Development is located in PAA 3, identified by Welsh Government as an area suitable to support wind farm development. This designation was informed by the modelling of landscape impacts such that large scale onshore wind is considered acceptable. The adherence to the step-wise approach ensures that the Proposed Development positively responds to the GI on Site, avoiding impacts on the most important designations, and mitigating other impacts through the construction management techniques highlighted in the oCEMP. The design process developed a siting for the turbines which limits their impact on the landscape.
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.		The restoration of Priority Habitats and bracken clearance shall help to restore the distinctiveness of these Priority Habitats, improving the local character.
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.		The procedures and management techniques set out in the oCEMP ensure that the commitment to GI is clearly demonstrated. The implementation of a PMoW before the commencement of construction and the employment of an ECoW throughout construction reiterates the commitment to maintaining and improving GI throughout the development process. These commitments to monitoring and habitat management continue for at least 5 years, as set out within the oHMP.

Table 5-3 – Building with Nature Wellbeing Standards

BwN Standard	Evidence	Assessment
Standard 7: Brings Nature Closer to People – The green infrastructure is close to where people live, work, learn, play and / or visit and is designed to optimise use and enjoyment for everyone across the year, to maximise health and wellbeing outcomes and to promote active living for existing and future communities.	Planning Design and Access Statement Socio-economic Assessment	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.
Standard 8: Supports Equitable and Inclusive Places – the green infrastructure is designed to encourage and enable everyone, including those from vulnerable or excluded groups, to use and enjoy it, help reduce health inequalities and to build a shared sense of community and belonging.		The Proposed Development will include a community benefit fund which can be used by the local community to support initiatives they consider they consider important and beneficial, including potential investment in Green Infrastructure.

Table 5-4 – Building with Nature Water Standards

BwN Standard	Evidence	Assessment
Standard 9: Delivers Climate Resilient Water Management – the green infrastructure is integral to sustainable drainage using above ground features to manage flood risk, maintain the natural water cycle and improve water quality within the boundary of the 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	Planning Design and Access Statement Environmental Statement: Chapter 9 Hydrology Outline Construction Environmental Management Plan Outline Habitat Management Plan	A FCA 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 PCC. This has been prepared taking account of the baseline hydrology conditions across the Proposed Development. 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 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
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.		

BwN Standard	Evidence	Assessment
		implemented in the operational phase. The FCA concludes that the Proposed Development, together with the proposed flood risk management measures above, will not be subject to any unacceptable level of risk, nor would there be potential increased flood risk elsewhere

Table 5-5 – Building with Nature Wildlife Standards

BwN Standard	Evidence	Assessment
Standard 11: Delivers Wildlife Enhancement – the green infrastructure optimises long term and climate resilient net benefits for nature, by retaining and enhancing existing ecological assets and creating locally relevant new habitats within the boundary of the project. Wildlife measures are secured at all stages of implementation and where applicable, across multiple phases of development. **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.	Planning Design and Access Statement Environmental Statement: Chapter 5 – Ecology and Chapter 6 – Ornithology Outline Construction Environmental Management Plan Outline Habitat Management Plan	Chapter 5 of the Environmental Statement assesses the likely effects on national statutory designated sites for nature conservation and protected habitats and species. As set out in the NBB Report, impacts on Protected Species are as follows: ▪ Bats – No Potential Roost Features were identified within any trees located within the Main Site during a Daytime Bat Walkover. ▪ Badger – The updated NVC survey identified an active outlier badger sett within the construction footprint. ▪ Dormouse – Presence of dormice were confirmed during surveys, with individual dormice potentially at risk. ▪ GCN – A pond was identified with a positive eDNA result for the presence of GCN. ▪ Riparian Mammals – Watercourses were considered unsuitable for water vole, but suitable for otter. However, no evidence of otter was recorded during surveys.

BwN Standard	Evidence	Assessment
		Through implementation of management techniques highlighted in the CEMP, alongside the small permanent impact to habitat, it is concluded that the impact on Protected Species can be managed. The enhancement proposed, set out in the oHMP and NBB shall support the creation and restoration of resilient ecological networks in the wider landscape.

6 CONCLUSION

6.1 SUMMARY OF THE GREEN INFRASTRUCTURE ASSESSMENT

6.1.1. As the GIS and Environmental Statement demonstrate, the Proposed Development has been developed in accordance with a range of legislative and policy matters, including Planning Policy Wales (12th edition); Future Wales, Powys County Council Local Development Plan and Green Infrastructure Assessment, relevant NRW area statements and the Well-being of Future Generations Act.

6.1.2. The step-wise approach taken by the Applicant in informing and subsequently refining the Proposed Development layout has avoid direct impacts to statutorily designated sites and reduced the impact on Priority Habitats through an iterative design process.

6.1.3. From that stage, and in utilising the DECCA framework and applying the principles of the BwN Standards Framework, the Applicant has developed and proposed a series of biodiversity net benefits to support both the Site and surrounding area – creating a resilient and connected ecosystem.

6.1.4. Overall, through implementation of the construction/site management techniques highlighted in the oCEMP and through the habitat management and enhancement mitigation proposals put forward in the oHMP and Net Benefit for Biodiversity report (Appendix C), it is concluded that the Proposed Development would provide environmental net benefits and create improved GI connectivity within the site and surrounding area.

6.1.5. In addition, the positive enhancements resulting from the Proposed Development shall support wider local, regional and national objectives in enhancing biodiversity and green infrastructure in Wales.

6.1.6. In respect of ‘irreplaceable habitats’ on Site – specifically Ancient Woodland and blanket bog. The Proposed Development has been designed to minimise the impacts on the irreplaceable habitats however would result in the loss of small areas of Ancient Woodland and blanket bog. Taking all relevant considerations into account, including overarching policy support, the significant benefits of the Proposed Development in terms of renewable energy generation to meet net zero targets, and the proposed mitigation and compensation measures, these are considered to outweigh the potential impacts on irreplaceable habitats as these would be justifiable under the “wholly exceptional” circumstances under the terms of Step 1b) of the step-wise approach in PPW12, as detailed in Sections 5 and 6 of the PDAS.

6.1.7. In conclusion, the Applicant considers that the step-wise approach has been applied in the evolution of the design of the Proposed Development and is compliant with the relevant policy and guidance, providing a net benefit for biodiversity and strengthening green infrastructure.

7 GLOSSARY

- ALC – Agricultural Land Classification;
- BESS – Battery Energy Storage System;
- BwN – Building with Nature;
- CBF – Community Benefit Fund;
- CMMP - Curlew Management and Monitoring Plan;
- DECCA – Diversity, Extent, Condition, Connectivity and Adaptability.;
- DNS – Development of National Significance;
- EIA – Environmental Impact Assessment;
- ES – Environmental Statement;
- GI – Green Infrastructure;
- GIS – Green Infrastructure Statement;
- LDP – Local Development Plan;
- NBB – Net Benefit for Biodiversity;
- NRW – Natural Resources Wales;
- oHMP – Outline Habitat Management Plan;
- PAA – Pre-Assessed Areas;
- PCC – Powys County Council;
- PDAS – Planning, Design and Access Statement;
- PEDW – Planning and Environment Decisions Wales;
- PPW12 – Planning Policy Wales 12;
- SSSI – Site of Special Scientific Interest;
- TAN – Technical Advice Notes;
- TCPA – Town and Country Planning Act; and
- WG – Welsh Government.

Appendix A

FIGURE 1.1 - SITE LOCATION PLAN

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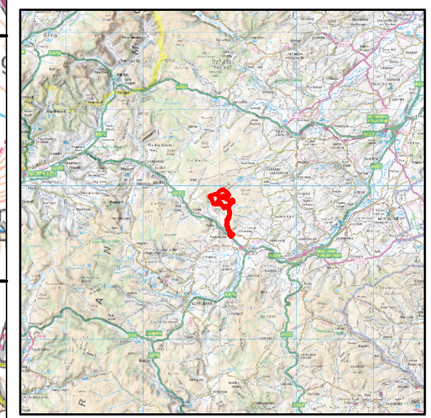
297000 298000 299000 300000 301000 302000 303000 304000

299000 298000 297000 296000 295000 294000

Hendre
Dôl-friog
Cwm-yr-annel
Yr Allt
457
Cairn
Blaen-y-cwm
Y Gloncx Cairn 461
99
332
Nant y Llyn Mawr
Tŷ-uchaf
350
330
Lluestycerrig
383
Mynydd Clogau
397
Cairn
Mynydd Cerrigllwydion
443
Cairns
Cairns
Cairn
Lluestuchaf
388
Garreg-hir
98
314
433
485
434
Bryn Du
430
420
Bryn y Fawno
Ffrwd-we
405
442
Allt Fawr
386
Llyn Mawr
Llyn y Tarw
400
390
Pantygesail
Cairns
97
405
Standing Stone
Clogau
Cloryn
Ty-gwyn
Parc-y-rhiw
Llyn Du
412
373
Mynydd Llwyt
412
Caer Noddfa
Gilfach-hîr
Bwlch y Garreg
Gelli
Alltyffynnon
Plasnewydd
177
162
267
96
329
MS
Maesypandy
Ddifed
412
257
Gilfach
A470
Oerttrwd
Plasauduon
Ffridd Isaf
Gwern-y-bwll
Trawscoed
258
Wgi-fawr
Tanyrallt
252
175
95
Llwyngwyn
Clatter
Allt y Genlli
146
356
196
Penb
MS
A470
Sort
Alltwnnog
Mynydd Garth-pwt
397
285
269
161
94
Pontdolgoch
Cemy
134
B4568
Llanwnog
201
Enclosure
Garthpwt
Graigorddle
141
Hafod
351
Caesamson
Foel y Belan
Craigfryn
155

Key

Site boundary



0 250 500 750 1,000 1,250 1,500 m

Scale at A3:1:25,000

Client

wind2

Parc Ynni Calon y Gwynt

Green Infrastructure Statement

Figure 1.1
Site Location Plan

wsp

June 2026