Fferm Solar Larnog

Environmental Statement

Appendix 7G: Net Benefit for Biodiversity Report

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Issue Sheet

Report Prepared for Trydan Gwyrdd Cymru

Document Title

Appendix 7G: Net Benefit for Biodiversity Report

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Executive Summary

WSP UK Limited was commissioned by Trydan Gwyrdd Cymru to assess whether the proposed Larnog Solar Farm, hereafter known as the 'Proposed Development', would deliver a Net Benefit for Biodiversity (NBB) and promote ecosystem resilience in accordance with Planning Policy Wales Edition 12. The Proposed Development would be located south-west of Penarth and east of Sully (an area hereafter referred to as the 'Site').

The Proposed Development has been designed in accordance with the step-wise approach. Woodland, trees, scrub, hedgerows, field boundaries, waterbodies and other habitats of comparatively high ecological value have been retained and protected wherever practicable. Permanent habitat loss would be largely restricted to arable land required for the substation and Battery Energy Storage System compound, internal access tracks and associated infrastructure. Arable land beneath and between the solar photovoltaic arrays would be modified and managed as grassland rather than permanently lost.

The proposals include the strengthening and creation of hedgerows, tree and orchard planting, and creation of species-rich and tussocky grassland, attenuation ponds and marginal habitats. They also include creation of dedicated Eurasian skylark plots and a range of species-specific habitat features. These measures would increase habitat diversity, extent, condition and connectivity across the Site.

Subject to implementation of the measures set out within this report and the Outline Landscape and Ecological Management Plan, the Proposed Development provides sufficient opportunity to deliver an overall NBB and improve ecosystem resilience over its operational lifetime.

1. Introduction

1.1. Project Background

1.1.1. WSP UK Limited ('WSP') was commissioned by Trydan Gwyrdd Cymru (the Applicant) to complete a Net Benefit for Biodiversity assessment in relation to the proposed Larnog Solar Farm, hereafter known as the 'Proposed Development'. The Proposed Development would be located on land approximately 500 m south-west of Penarth and 550 m east of Sully (central National Grid Reference: ST 17739 68268) (hereafter the 'Site'). The Site Boundary is shown on **Figure 1 of Appendix 7A: Preliminary Ecological Appraisal (PEA) 2026** of the ES**.**

1.1.2. This report forms **Appendix 7G: Net Benefit for Biodiversity** of the Environmental Statement (ES) and should be read alongside **Chapter 7: Biodiversity** and the supporting ecological appendices.

1.1.3. The Site is predominantly composed of arable fields separated by hedgerows and lines of trees, with parcels of woodland throughout. The Site lies to the east of the Severn Estuary and is bound to the north by a road (B4267). A disused railway track runs from east to west across the Site. Cosmeston Lakes, freshwater lakes which are flooded limestone quarries, are located to the north of the Site.

1.1.4. The requirement for a development to achieve a Net Benefit for Biodiversity (NBB) is secured in Welsh planning policy through Edition 12 of Planning Policy Wales (PPW)[1]. This includes an approach to delivering NBB in Wales, with the onus being placed on demonstrating both a measurable NBB and promoting ecosystem resilience. The NBB approach intends to deliver an overall improvement in biodiversity. It does not utilise a metric. It instead assesses improvement in biodiversity qualitatively, putting the emphasis on proactive consideration of biodiversity and wider ecosystem benefits within a placemaking context early in the design process. This approach encourages the consideration of features that may not necessarily be protected, but are crucial for ecosystem functioning, leading to more joined up spaces for nature. There is no mandatory length of time for which post-construction management is required in Wales.

1.2. Ecological Background

1.2.1. The ecological baseline of the Site described within this report has been developed based on the results of a suite of ecological surveys and assessments carried out to date. Survey areas encompassed the Site and an area of surrounding habitats within a 'Survey Area', to collect survey data across a wider area whilst the Site boundary was developed and refined.

[1] Welsh Government. (2024). Planning Policy Wales (PPW). (Edition 12) 2024.

1.3. Proposed Development

1.3.1. The Proposed Development will consist of the following main components:

- Ground mounted solar PV arrays generating station with a gross electrical output capacity to the distribution grid network in the region of 35 MW. The generating station will include solar PV modules and mounting structures;
- Project Substation compound, which will include substation, switching and control equipment, storage areas, vehicular parking, material laydown areas, perimeter fencing, lighting, security infrastructure and associated ancillary equipment;
- Battery Energy Storage Systems (BESS) would also be included within the Project Substation compound;
- Balance of Solar System (BoSS) which consists of inverters, transformers and switchgear;
- Ancillary infrastructure works including underground cables, boundary treatments, security equipment, weather stations, landscaping, biodiversity enhancement, access tracks, earthworks, surface water management, and any other works identified as necessary to enable the development; and
- Landscaping, habitat management, biodiversity enhancement and amenity improvements.

1.3.2. An indicative layout of the Proposed Development is shown on **Figure 5.1: Indicative Site Layout** of the ES.

1.4. Scope of Report

1.4.1. This report considers if the Proposed Development would deliver an NBB whilst also promoting ecosystem resilience, thus demonstrating compliance with planning requirements. The scope of this report is to:

- Summarise the legislative and policy requirements that shaped the assessment (**Section 1.5**);
- Provide an ecological baseline of the Site through providing an overview of the relevant ecological assessments that have informed the Proposed Development to date (**Section 2.1**);
- Provide details of habitats lost to the Proposed Development (**Section 3**);
- Provide details of mitigation measures provided following the 'step-wise approach' (**Section 4**);
- Provide examples of how the Proposed Development promotes the resilience of ecosystems through reference to the DECCA Framework (**Section 5**);
- Provide future management and monitoring requirements (**Section 6**); and
- Summarise the conclusion of the NBB assessment (**Section 7**).

1.5. Relevant Legislation and Policy

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

- The Environment (Wales) Act 2016[2];
- The Wellbeing of Future Generations Act 2015[3];
- Future Wales – The National Plan 2040[4];
- PPW 2024 (Edition 12), including the DECCA Framework (see **Section 1.7**);
- Nature Recovery Action Plan Wales (NRAP) – the Biodiversity Strategy for Wales. Part 1: Our Strategy for Nature (2015) and Part 2: Nature Recovery Action Plan (2020 – 2021)[5];
- Vale of Glamorgan A Biodiversity Action Plan (2024)[6];
- Vale of Glamorgan Nature Recovery Action Plan (2024)[7] and;
- Vale of Glamorgan Biodiversity Forward Plan (2019)[8].

1.6. Step-wise Approach and Compensation

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

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

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2 Welsh Government. (2016). Environment (Wales) Act 2016.
3 Welsh Government. (2015). The Wellbeing of Future Generations Act 2015.
4 Welsh Government. (2021). Future Wales – The National Plan 2040.
5 Welsh Government. (2020). Nature Recovery Action Plan Wales (NRAP) – the Biodiversity Strategy for Wales. Part 2: Nature Recovery Action Plan (2020 – 2021).
6 Vale of Glamorgan (2024). A Biodiversity Action Plan. Available at: https://www.valeofglamorgan.gov.uk/Documents/Living/Environment/Biodiversity-Action-Plan.pdf
7 Vale of Glamorgan (2024). Nature Recovery Action Plan. Available at: https://www.valenature.org/nature-recovery-action-plan
8 Vale of Glamorgan (2019). Biodiversity Forward Plan. Available via the Vale of Glamorgan Council Nature Emergency Action Plan at https://www.valeofglamorgan.gov.uk/Documents/_Committee%20Reports/Cabinet/2021/21-12-20/Nature-Emergency-Delivering-the-Councils-Action-Plan.pdf

1.7. DECCA Framework

1.7.1. PPW 2024 (Edition 12) instructs planning authorities to take account of and promote the resilience of ecosystems when assessing planning applications.

1.7.2. Natural Resources Wales (NRW) have developed a framework for evaluating ecosystem resilience based on five attributes and properties specified in the Environment (Wales) Act 2016[2]. This is referred to as DECCA and comprises the objectives listed:

- Diversity – maintaining and enhancing diversity at every scale, including genetic, structural, habitat and between-habitat levels. This supports the complexity of ecosystem functions and interactions that deliver services and benefits;
- Extent – incorporating measures which maintain and increase the area of semi-natural habitat/features and linkages between habitats. In general, smaller ecosystems have reduced capacity to adapt, recover or resist disturbance;
- Condition – the condition of an ecosystem is affected by multiple and complex pressures acting both as short term and longer-term types of disturbance. Both direct and wider impacts should be considered, for example avoiding or mitigating pressures such as climate change, pollution, invasive species, land management neglect etc;
- Connectivity – this refers to the links between and within habitats, which may take the form of physical corridors, stepping stones in the landscape, or patches of the same or related vegetation types that together create a network that enables the flow or movement of genes, species and natural resources. Developments should take opportunities to develop functional habitat and ecological networks within and between ecosystems, building on existing connectivity; and
- Adaptability to change – ecosystem resilience is a product of the above four attributes. Adaptability, recovery and resistance to/from a disturbance are defining features of ecosystem resilience.

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

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

[9] Welsh Government (2012). The Natural Resources Body for Wales (Establishment) Order 2012.

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

2. Site Baseline

2.1. Overview

2.1.1. The below section outlines the ecological baseline of the Site based on a suite of ecological surveys and assessments carried out in 2025 - 2026. Ecological surveys were undertaken during appropriate survey periods for the relevant habitats and species, in accordance with applicable good-practice guidance. Where initial survey work was undertaken outside the optimal botanical survey period, this was supplemented by an update Phase 1 habitat survey undertaken in June 2026. Full details, including full recommendations and mitigation measures for each ecological receptor can be found in the respective reports (**Appendices 7A – 7F** of the ES). This report summarises the mitigation measures identified through application of the step-wise approach and which contribute to the delivery of NBB (see **Section 4**). Receptor-specific mitigation measures are detailed within **Chapter 7: Biodiversity** of the ES and the supporting ecological documents.

2.1.2. The baseline surveys and assessments focused on the Site and a wider area, within the wider Survey Area, **see Figure 1 of Appendix 7A: PEA 2026** of the ES, with the Site having since been refined in October 2026. The respective survey areas for each survey / assessment are detailed in the corresponding survey reports (**Appendices 7A – 7F** of the ES).

2.2. Desk study context

2.2.1. A desk study was undertaken in February 2025 to review existing ecological baseline information available in the public domain and to obtain information held by relevant third parties. For the purpose of the desk study exercise, records were collated within various radii around the Site, which is consistent with good practice guidance published by the CIEEM (2017a and 2017b).

2.2.2. The Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar Site and Site of Special Scientific Interest (SSSI) are located approximately 169 m east of the Site.

2.2.3. All three sites of international importance identified were considered in a Habitats Regulations Assessment (HRA): Stage 1 Screening produced in October 2026 (**Appendix 7B: Habitats Regulations Assessment** of the ES) which identified no potential impact pathways that could result in Likely Significant Effects (LSEs) on the sites of international importance, both alone, and in-combination with other developments.

2.2.4. There are five SSSIs within 2 km of the Site, comprising Penarth Coast SSSI, located adjacent to the south-eastern boundary of the Site, Llynnoedd Cosmeston/Cosmeston Lakes SSSI,

located approximately 125 m to the north, Severn estuary SSSI located approximately 169 m to the east, Sully Island SSSI, located approximately 600 m to the south, and Cog Moors SSSI, located approximately 1.2 km to the north-west.

2.2.5. In addition, Cosmeston Lakes Country Park Local Nature Reserve is located to the north of the Site, whilst Lavernock Point Nature Reserve lies adjacent to the south-eastern boundary, with part of the reserve overlapping Penarth Coast SSSI.

2.2.6. There are two Sites of Importance for Nature Conservation (SINCs), a non-statutory designated site located within 20 m of the Site. These are Lavernock Point East and Ty-r-Orsaf. The Site also falls within the boundary of a B-Lines area, a strategically important ecological network established to provide habitat connectivity for pollinating insects through a series of wildflower-rich habitat corridors.

2.2.7. No habitats identified as Ancient Woodland are present within 2 km of the Site.

2.2.8. A search for waterbodies within 500 m of the respective Survey Area identified seven waterbodies. This included three waterbodies within the Survey Area (identified as P1, P6 and P7 in the PEA report (**Appendix 7A: PEA 2026** of the ES)), and four waterbodies to the north of the Survey Area (identified as P2 to P5 in the PEA report (**Appendix 7A: PEA 2026** of the ES)). During both Phase 1 habitat surveys, in February 2025 and June 2026, P1 and P6 were found to be dry and not present. P7 was present during the 2025 Phase 1 habitat survey but was shallow in water depth and was considered to be ephemeral. The same waterbody was dry during the June 2026 survey. Due to a refinement on Site boundary, P7 is now located outside of the Site.

2.2.9. Full information regarding the desk study can be found within the 2025 PEA report (**Appendix 7A: PEA 2026** of the ES).

2.3. Extended Phase 1 Habitat Survey

2.3.1. A PEA for the Proposed Development was undertaken by WSP in February 2025 (WSP, 2025). As the habitat survey was undertaken outside of the optimal survey season for botanical species, an update Phase 1 habitat survey was completed in June 2026 and reported in **Appendix 7A: PEA 2026**.

2.3.2. Overall, the following habitats were identified on Site:

- Broadleaved woodland – semi-natural;
- Mixed woodland – semi-natural;
- Scrub – dense/continuous;
- Scrub – scattered;
- Neutral grassland – semi-improved;
- Continuous bracken;

- Tall ruderal;
- Standing water;
- Arable;
- Parkland and scattered trees;
- Hedge and trees – native species – poor; and
- Dry ditch.

2.3.3. The habitats on Site were assessed to have suitability to support the following protected and notable species or species groups:

- Roosting, commuting, and foraging bats;
- Badgers;
- Dormouse;
- Hedgehog;
- All breeding birds;
- All wintering birds;
- Widespread reptile species (common lizard *Zootoca vivipara*, adder *Vipera berus*, grass snake *Natrix natrix* and slow worm *Anguis fragilis*);
- Terrestrial phase widespread amphibian species (common frog *Rana tempora*, common toad *Bufo bufo*; palmate newt *Lissotriton helveticus* and smooth newt *Lissotriton vulgaris*), however, excluding great crested newt *Triturus cristatus*;
- Protected and notable invertebrate species, including 26 species listed as Species of Principal Importance under Schedule 7 of the Environment (Wales) Act 2016; and
- Threatened arable plants.

2.3.4. Further targeted surveys were carried out for threatened arable plants, bats and wintering birds, where the findings of the desk study, initial site survey and presence of impact pathways identified that further survey information was required to inform the assessment. The further targeted surveys are discussed below.

2.3.5. For other protected and notable species and species groups, and where none or limited impact pathways were present, the baseline information was considered sufficient to inform the assessment and appropriate avoidance and mitigation measures. For these cases, further species-specific surveys were therefore not required..

2.3.6. Other recommendations were provided for the remaining receptors within the 2026 PEA report (**Appendix 7A: PEA 2026** of the ES) to avoid or minimise potential effects during construction. These include species-specific precautionary methods, which will be set out within a Precautionary Method of Working (PMoW) and implemented during construction, where relevant.

Bats

2.3.7. A Daytime Bat Walkover (DBW) was carried out concurrently with the extended Phase 1 habitat survey in February 2025 (**Appendix 7A: PEA 2026** of the ES), in accordance with best practice guidance methodology[10]. The DBW assessed trees as either having 'none' (no Potential Roost Features (PRFs) in the tree), 'FAR' (further assessment required to establish the presence of PRFs in the tree) or 'PRF' (at least one PRF present within the tree).

2.3.8. The DBW identified 32 trees within the respective Survey Area that contained at least one PRF and that would require further assessment (in accordance with best practice guidelines (Collins, 2023)). These included the following species: ash *Fraxinus excelsior*, oak *Quercus spp.*, blackthorn *Prunus spinosa*, and elder *Sambucus nigra*.

2.3.9. The Site boundary was subsequently refined and of the 32 trees initially assessed as PRF, 21 were located either within, or within 20 m of the refined Site boundary. These were identified as: BT1, BT2, BT3, BT4/BT5, BT6, BT7, BT8, BT9, BT10, BT12, BT23, BT24, BT25, BT26, BT27, BT28, BT29, BT30, BT31, and BT32 on Figure 7 of the 2025 PEA report (**Appendix 7A: PEA 2026** of the ES).

2.3.10. The 21 trees were subject to close inspection surveys to allow for a more detailed assessment of the likely suitability of the trees for bats, look for more conclusive evidence of bats, and to confirm the status of any roosts identified during the further surveys. Surveys were completed in June, July, August and December 2025, with results shown in **Appendix 7D: Bat Roost Survey Report** of the ES).

2.3.11. Whilst no bats were identified present during the close inspection tree surveys, 14 of the 21 trees were confirmed to remain suitable for supporting roosting bats. These were classified as:

- PRF-M (suitable to support multiple bats) – five trees (BT3, BT4, BT23, BT24 and BT32); and
- PRF-I (suitable to support individual bat or very small numbers of bats) – nine trees (BT2, BT7, BT8, BT12, BT25, BT26, BT28, BT29, and BT30).

2.3.12. During the 2025 PEA (**Appendix 7A: PEA 2026** of the ES), habitats within the respective Survey Area were also assessed as having moderate suitability to support foraging and commuting bats. Woodland, scrub, semi-improved grassland and hedgerows and lines of trees provide good opportunities for commuting, and these extend beyond the Site to provide good opportunity for foraging outside of the Site, particularly around Cosmeston Lakes to the north of the Site

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

2.3.13. Bat activity surveys, comprising Night-time Bat Walkover (NBW) surveys and automated static detector deployment were carried out in spring, summer and autumn 2025. Three NBW surveys were carried out (one per season) and automated static detectors were deployed for a continuous period of five nights per season, in accordance with best practice survey guidelines for habitats of moderate suitability[11]. The respective NBW transect routes and static detector deployment locations are shown on **Figure 2** of the corresponding bat activity report (**Appendix 7E: Bat Activity Report** of the ES).

2.3.14. During the NBW surveys, a total of seven species were recorded: common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, Nathusius Pipistrelle *pipistrellus Nathusii*, noctule *Nyctalus noctula*, leisler's bat *Nyctalus leisleri*, serotine *Cnephaeus serotinus*, and *Myotis* species *Myotis spp*. The majority of records were of common pipistrelle and soprano pipistrelle bats.

2.3.15. The automated static detector deployment surveys recorded similar bat species across the Site, as listed above, but also recorded individual passes of brown long-eared *Plecotus auritus*, lesser horseshoe *Rhinolophus hipposideros* and greater horseshoe bat *Rhinolophus ferrumequinum.* Common pipistrelle and soprano pipistrelle records made up the bulk of activity.

2.3.16. Overall, bat activity levels across the Site were considered to be of a moderate level.

Wintering Birds

2.3.17. Habitats on Site such as scrub, woodland, hedgerow, grassland and arable land were all assessed during the 2025 PEA (**Appendix 7A: PEA 2026** of the ES) as being suitable to support a range of common and widespread bird species. The Site was also identified as suitable to support foraging and roosting waders, as it contains relatively large, open agricultural fields close to the Severn Estuary. These fields may provide feeding or resting habitat, including during periods of high tide when intertidal feeding areas are unavailable. Certain species of waders are qualifying features of the Severn Estuary SPA/Ramsar.

2.3.18. Wintering bird surveys, comprising monthly transects, were carried out between November 2025 – March 2026 in line with best practice survey guidelines[12]. The transect route was designed to prioritise areas most favourable for notable wintering birds and is shown on **Figure 1** of the Wintering Bird Survey Report (**Appendix 7C: Wintering Bird Survey Report** of the ES).

[11] Collins J. (ed.) (2023) Bat Surveys for Professional Ecologists, Good Practice Guidelines (4th Edition). The Bat Conservation Trust, London.
[12] Bird Survey & Assessment Steering Group. (2025). Bird Survey Guidelines for assessing ecological impacts. Available at: https://birdsurveyguidelines.org

2.3.19. A total of 44 species of bird were recorded during the Wintering Bird Survey including nine target species and 21 secondary species. The surveys indicated that the Site hosts a diverse range of species with most seen in low numbers or infrequently. Eurasian skylark *Alauda arvensis* , meadow pipit *Anthus pratensis,*, redwing *Turdus iliacus* , and chaffinch *Fringilla coelebs* were observed although none regularly made up more than 1% of their county wintering populations.

2.3.20. The Site supported a diverse wintering bird assemblage, although most species occurred in low numbers or infrequently. Habitat such as arable crops and hedgerow/woodland field boundaries were considered likely to offer valuable food resources for both resident and migrant wintering birds. The survey found no evidence that qualifying species from the nearby Severn Estuary SPA and Ramsar sites were using the fields within the Site and respective Survey Area. The surveyed land was therefore not considered Functionally Linked Land (FLL) in relation to the SPA or Ramsar sites.

Eurasian Skylark

2.3.21. As breeding Eurasian skylark was considered likely to be present on Site, it was determined that data from the February and March 2026 Wintering Bird Survey visits would be used to estimate the number of breeding territories for the species within suitable habitat on Site e.g., arable land and grassland.

2.3.22. Ten potential Eurasian skylark breeding territories were identified in the respective Survey Area, with four of these within the Site itself. The remaining six potential territories were located within the agricultural fields east of the Site (but within the Survey Area).

Threatened Arable Plants

2.3.23. The Site comprises predominantly arable fields. Although arable land does not constitute a priority habitat in itself, arable fields and their margins can support threatened and notable arable plant species associated with cultivated ground.

2.3.24. A threated arable plant survey was undertaken in 2026 to determine whether threatened arable plant species were present and inform the assessment and appropriate avoidance and mitigation measures. This survey comprised a survey visit in June and another in August 2026, the principal identification periods for threatened annual arable plants.

2.3.25. The surveys comprised a systematic walkover of the field margins within the respective Survey Area. The field margins and an area extending up to 6 m from the field boundaries were thoroughly searched for threatened arable plants[13, 14] . The remainder of each field was scanned from the field edges and vantage points to identify any threatened arable

[13]Plantlife. No date. Back from the Brink: Arable Indicator Survey Instructions. Available at: https://naturebftb.co.uk/wp-content/uploads/2020/01/Arable-Indicator-Survey-Instructions_BLUE.pdf
14 Plantlife. 2014. Threatened arable plants of Wales: An identification guide.

plants within the cultivated area. Where possible, tramlines were accessed to closely inspect additional areas of the fields.

2.3.26. Most of the arable field margins within the respective Survey Area were very narrow (~1 m). The vegetation associated with the fields margins was dominated by species indicative of nutrient enrichment or species capable of out-competing low nutrient adapted specialists, such as nettle *Urtica dioica*, creeping thistle *Cirsium arvense* and cleavers *Galium aparine*.

2.3.27. No threatened arable plants were recorded during the June 2026 survey, however two were recorded during the August 2026 survey. These were round-leaved fluellen *Kickxia spuria* and sharp-leaved fluellen *Kickxia elatine,* two species which are annual arable plants typically associated with cultivated and disturbed ground. Overall, suitable habitat for threatened arable plants was present within relatively small and discrete areas of the Survey Area.

2.3.28. Records were concentrated within the eastern-most fields of the Survey Area, outside the Site boundary. A single individual round-leaved fluellen plant was recorded within the Site, as shown on **Figure 1 in Appendix 7F: Threatened Arable Plants** of the ES.

3. Habitat Loss and Gains

3.1.1. The Site is 46.54 hectares (ha) in size and largely comprises agricultural land with defined field boundaries and pockets of woodland. The Survey Area consists of 117 ha.

3.1.2. An overview of habitat loss and gain is provided below and is based on the Landscape and Ecological Masterplan (**Appendix 6G: Outline LEMP** of the ES).

3.1.3. Detailed calculations of habitat loss and gain are not available for the Proposed Development at this stage as the Proposed Development retains flexibility for the detailed layout of the solar arrays, associated infrastructure and construction access routes. The final extent of habitat loss, modification, creation and enhancement will therefore depend on the detailed design developed within the parameters assessed in the ES.

3.1.4. The assessment of NBB has therefore been undertaken qualitatively, having regard to the nature and ecological value of habitats affected, the extent of habitat retention incorporated into the design, and the habitat enhancement and creation measures proposed. This is consistent with the NBB approach, which does not rely upon a biodiversity metric. Particular weight has been given to the retention and enhancement of habitats that contribute to ecosystem resilience and ecological connectivity.

3.1.5. While the Proposed Development would result in the loss agricultural land of relatively low ecological value, the proposed habitat creation and enhancement measures are expected to deliver a greater ecological benefit through the enhancement, creation and improved connectivity of habitats of higher biodiversity value. On balance, therefore, the ecological benefits associated with these measures are therefore considered likely to exceed the adverse effects arising from the loss of these lower-value habitats, supporting an overall positive contribution to biodiversity.

3.2. Habitat Loss

3.2.1. To enable construction of the Proposed Development, existing habitats within the Site will be cleared or modified. All habitat loss or modification will be restricted to arable land, which is already routinely actively harvested and are of relatively low biodiversity.

3.2.2. The anticipated habitat loss and modification across the Site is detailed below.

3.2.3. The BESS and substation infrastructure will be located within a dedicated and fenced compound near the centre of the Site, immediately west of St Mary's Well Bay Road. The compound will include areas of hardstanding, internal access roads, equipment maintenance areas and associated fire-water storage and containment infrastructure. The overall size of the compound is anticipated to be approximately 60 x 54 m, and habitats currently present here that will be permanently lost, comprise arable land.

3.2.4. Internal access tracks will be provided throughout the Site to facilitate access for construction, operational and maintenance vehicles. Where practicable, the Proposed Development will utilise existing farm tracks, field gateways and gaps in field boundaries in order to minimise the need for new access infrastructure and avoid the loss of existing habitats. Approximately 2.4 km of new access tracks would be required within the Site. The tracks will have a typical width of approximately 4 m, with a maximum width of up to 6 m required for two-way tracks and bends. Existing habitats that would be permanently lost within the footprint of the internal access tracks comprise arable land.

3.2.5. All fields designated for solar PV arrays have suitable access points and are connected by an existing network of tracks currently used by agricultural machinery. No new access points between fields will be created, however owing to the requirement for a maximum width of up to 6 m (as detailed above), particularly for two way tracks and at bends, existing access points between fields at select locations only may need to be widened marginally. This would entail the loss of fringe habitats only of limited nature conservation importance. Early survey work identified that all existing internal access points within the Site varied in width, measuring 4 – 10 m wide, and therefore widening requirements is expected to be minimal (1 – 2 m either side of existing gaps), at select locations only.

3.3. Habitat Modification

3.3.1. The solar PV arrays will be ground mounted onto structures and installed in arable fields within the Site. The habitat beneath the structures will remain and allowed to continue to be grazed by sheep, ensuring continuity of traditional land management practices. This component of the Proposed Development will therefore constitute a habitat modification.

3.4. Habitat Gain

3.4.1. All habitats of high ecological value including woodland, scattered trees and hedgerows within the Site will be retained as far as practicable. Direct effects on hedgerows would be limited to the localised widening of existing field access points. No trees identified as having suitability for roosting bats will be lost and identified flight lines will be maintained across the Site.

3.4.2. Furthermore, a 10 m buffer around existing field boundaries has been incorporated within the design as an embedded measure, with the buffer area retained and protected throughout the Proposed Development. Where retained trees or woodland are present, the applicable Root Protection Area has been established through the Arboricultural Impact Assessment in accordance with BS 5837:2012 (see **Appendix 7H: Arboriculture Impact Assessment** of the ES).

3.4.3. A single record of the threatened arable plant round-leaved fluellen was recorded present within this 10 m buffer and is expected to be maintained within the soils at this location.

3.4.4. Proposed habitat gains are shown on the Landscape and Ecological Masterplan (included within **Appendix 6G: Outline LEMP** of the ES). This includes:

- Strengthening of existing hedgerows and field boundaries;
- Enhancement of field margins and boundary habitats;
- New hedgerow, tree, scrub and orchard planting;
- Establishment of species-rich wildflower grasslands;
- Creation of attenuation ponds and marginal wetland habitats;
- Creation of dedicated skylark plots; and
- Installation of bee banks, beetle banks, habitat piles, bat boxes, bird boxes and other biodiversity enhancement features.

3.4.5. Where existing hedgerows and field boundaries currently exhibit gaps or are in sub-optimal condition, supplementary planting of native whips will be undertaken to restore structural continuity and improve their function as both landscape features and wildlife corridors. This will apply Site-wide. Hedgerows will also generally be maintained at a height of 2 m (unless additional visual screening is required) to help minimise their suitability as elevated perching locations for avian predators, thereby reducing potential predation pressure on ground-nesting bird species such as Eurasian skylark.

3.4.6. Tussocky grassland field margins measuring 10 m wide will be created between retained or proposed hedgerows, tree belts and woodland edges and the adjoining solar PV arrays. These will be established through a minimal mowing regime of the existing grass sward ensuring cuttings are removed from Site. These areas will provide an ecologically functional transition between woody landscape features and the grassland beneath and between the solar PV arrays, whilst providing shelter, nesting, foraging and commuting habitat for invertebrates, small mammals and farmland birds. The tussocky grassland margins will also be managed as livestock-exclusion areas (through fencing where appropriate) to allow the development of a tall and structurally diverse sward.

3.4.7. New habitats will be created including planting of new hedgerow along sections of the Site boundary and adjacent to the Wales Coast Path Public Right of Way footpath which crosses the Site. Native trees will be planted around the BESS and substation compound for visual screening purposes, and between existing woodland blocks within and adjoining the Site. These will provide linear flight lines for protected species such as bats and birds, which over time, will mature and provide established flight line links to the wider landscape.

3.4.8. A traditional orchard will also be planted, likely in the east of the Site, acting as a multifunctional landscape and ecological feature. The orchard will increase habitat diversity

and provide a focal landscape feature within the Site whilst providing a valuable food source for a range of protected and notable species.

3.4.9. Wildflower areas will be established alongside the orchard and elsewhere within the Site by managing the existing grassland to reduce sward vigour and encourage successful establishment of native wildflower species. The areas shall be overseeded with a locally appropriate native wildflower and fine grass seed mix of local provenance where available. The seed mix shall be suitable for the target habitat type and local soil conditions (soil type determined in **Appendix 7F: Threatened Arable Plants**; mostly slowly permeable clay and silt-based soils) and shall contain a diverse range of perennial wildflower species characteristic of species-rich neutral grassland. The areas will be managed using an appropriate mowing regime, and arisings will be removed where necessary, to reduce soil fertility and encourage greater botanical diversity.

3.4.10. A varied mosaic of grassland and scrub communities adjacent to the Wales Coast Path will also be maintained.

3.4.11. Four potential Eurasian skylark breeding territories were identified within the Site. Installation of the solar PV arrays will prevent and deter skylark from returning to breed within these areas however dedicated skylark plots will be created within the eastern-most field of the Site. There are two existing skylark territories within the field. A total of eight additional skylark plots will be created within the field (positioned away from the field boundaries and tramlines), each measuring a minimum of 16 m^2. The plots will be formed by leaving unsown or sprayed-out patches within the crop to provide suitable areas for Skylark use. The remainder of the field would continue to be available for normal agricultural operations. Existing field boundary hedgerows would be maintained at an approximate height of 2 m as part of the ongoing management regime that is proposed across the Site. The creation of permanent grassland, including species rich grassland areas, would provide a valuable foraging resource for local skylark populations that can be secured for the lifetime of the Proposed Development. It is likely that this reliable foraging resource could boost breeding success of territories in land adjoining the Site, as well as increase the number of territories able to be supported by nearby farmland

3.4.12. Additional sheltering and nesting provisions for protected and notable species will also be provided, with habitat piles, bee banks and beetle banks created on Site, and a variety of bata and bird boxes installed on retained trees. The indicative location of these are shown on the Landscape and Ecological Masterplan (included within **Appendix 6G: Outline LEMP** of the ES).

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

4. Step-wise approach to mitigation

4.1. Overview

4.1.1. This section outlines the 'step-wise approach' that has been followed to avoid, minimise, mitigate and compensate for impacts resulting from the Proposed Development.

4.1.2. The step-wise approach has informed the Proposed Development from site selection and early design development onwards. The approach seeks, in the first instance, to avoid adverse effects on biodiversity through site selection and design. An experienced team of ecologists have been involved with the Proposed Development from the outset, advising on survey requirements and measures to avoid, minimise, mitigate and/or compensate impacts to species and habitats. This step-wise approach taken to deliver a NBB is described in detail in **Table 4.1.**

4.2. Step-wise Approach

4.2.1. Biodiversity and wider ecosystem benefits were considered early in the design process for the Proposed Development. This led to design changes, including the retention of habitats (through establishment of a 10 m around field boundaries and utilising existing internal access tracks where available) and avoidance of disturbance to protected species where possible (i.e., avoidance of habitats of high ecological value in the first instance). This accords with the 'Avoidance' principle of the step-wise approach.

4.2.2. Where it was not possible to avoid specific biodiversity impacts, measures to minimise the impacts were recommended. This led to the recommendation of several strategies and method statements (e.g., outline Construction Environmental Management Plan (oCEMP)) which aims to minimise the Proposed Development's impact on biodiversity. This accords with the 'Minimise' principle of the step-wise approach.

4.2.3. Where predicted impacts may still occur following avoidance measures and measures to minimise impacts, mitigation measures will be implemented. Mitigation and enhancement measures have been designed to reduce the impacts of the Proposed Development, supporting the 'Mitigate' principle of the step-wise approach.

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

4.2.5. The step-wise approach applied for ecological receptors through the development of proposals is summarised in **Table 4.1**. By following this approach, the Proposed Development will have the opportunity to fulfil its intention in creating the proposed energy

park and associated infrastructure, whilst also providing an enhanced area for biodiversity. The measures discussed will lead to an overall NBB and improve ecosystem resilience.

4.2.6. The mitigation and enhancement proposals are shown on the Landscape and Ecological Masterplan.

Table 4.1 - Step-wise approach taken to deliver NBB

Stage of step-wise approach	Measures taken in the design of the Proposed Development
Avoid	▪ The Proposed Development has been designed to avoid the loss of habitats of high ecological value wherever possible. This includes woodland, scrub, hedgerows and field boundaries. Habitat loss and / or modification across the Site will be restricted to arable land for the placement of solar PV arrays and the footprint of the internal access tracks and BESS and substation compound; ▪ Where existing farm tracks are available within the Site, these have been incorporated into the Proposed Development layout to avoid unnecessary creation of new tracks. The use of existing access points between fields have also been incorporated into the design, avoiding the need to create new access points or new severance of existing hedgerows; ▪ The Site boundary has undergone several refinement iterations and now avoids habitat loss or development within the Lavernock Point East and Ty-r-Orsaf SINCs. There are no International or other National statutory designations present within the Site. Waterbodies will also be avoided; ▪ A 10 m buffer around existing field boundaries has been incorporated within the design as an embedded measure, with the buffer area retained and protected throughout the Proposed Development; ▪ All trees identified as having suitability for roosting bats will be avoided; ▪ Light spill on any retained / boundary habitats has been avoided through limited construction activities to normal working hours and largely avoiding the hours of darkness, as detailed in the oCEMP; and ▪ The oCEMP 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/vehicle collisions.
Minimise	▪ Retainment of boundary features, including hedgerows and lines of trees, as far as possible. This will ensure that the connectivity of the Site is maintained and will continue to benefit commuting and foraging species such as bats and small mammals and will also provide a food source for species such as dormice; ▪ The incorporation of existing access points between fields within the Site as part of the internal tracks will minimise the extent of access point widening that is required and associated loss of fringe habitat, with early survey work confirming that all existing access points within the Site measure between 4 – 10 m wide. Any widening requirements is expected to be limited to 1 – 2 m either side of existing access points;

Stage of step-wise approach	Measures taken in the design of the Proposed Development
	▪ Management of existing and new hedgerows across the Site, to be maintained at a height of 2 m (unless additional visual screening is required) to help minimise their suitability as elevated perching locations for avian predators, thereby reducing potential predation pressure on ground-nesting bird species such as skylark; ▪ Production of and adherence to a Precautionary Method of Works (PMoW). This will include a pre-works check to confirm that Site conditions have not changed and that no additional ecological receptors require consideration before the commencement of works. This will minimise impacts to ecological receptors and will be outlined as part of the CEMP; ▪ Employment of an Ecological Clerk of Works (ECoW) during construction to ensure compliance with the oCEMP and PMOW. Vegetation clearance of habitats considered suitable to support dormice, reptiles and amphibians will be overseen by the ECoW; ▪ Provision of a Toolbox Talk (TBT) to contractors at the start of works to describe the biodiversity considerations associated with the Site and the measures to be taken to avoid / minimise impacts on these considerations; and ▪ Appropriate storage of construction materials and cut vegetation. Materials that could be used by sheltering animals will not be stored adjacent to potentially suitable habitat, to ensure mammals, reptiles and amphibians do not move onto the construction site.
Mitigate / Restore	▪ Creation of eight dedicated Eurasian skylark plots within the eastern-most field of the Site, to mitigate for the loss of four potential breeding territories and provide additional compensation (below); ▪ Site-wide planting up of existing hedgerows and field boundaries which currently exhibit gaps or are in sub-optimal condition, using native whips to restore structural continuity and improve their function as both landscape features and wildlife corridors.
Compensate on-Site	On-Site species-and habitat-specific compensation measures include: ▪ Creation of eight dedicated Eurasian skylark plots within the eastern-most field of the Site, to mitigate for the loss of four potential breeding territories and provide additional compensation.
Compensate off-Site	▪ At this stage there is no anticipated off-Site compensation. This report demonstrates how enhancement ratios are achievable within the Site boundary.
Enhancement	On-Site species-and habitat-specific enhancement measures include: ▪ Implement a sensitive and reduced mowing regime of the existing grass sward ensuring cuttings are removed from Site to provide tussocky grassland field margins measuring 10 m wide, between retained and proposed hedgerows. The margins will also be managed as livestock-exclusion areas (through fencing where appropriate) to allow the development of a tall and structurally diverse sward. A single annual cut (removing cuttings) will maintain grassland with a taller sward height and increased botanical diversity; ▪ A varied mosaic of grassland and scrub communities adjacent to the Wales Coast Path will also be maintained; ▪ Install brash and log piles as artificial hibernacula. Piles of vegetation will provide suitable egg-laying sites for reptiles. These will also provide refuge/hibernation opportunities for species such as dormouse, hedgehog, reptiles and amphibians;

Stage of step-wise approach	Measures taken in the design of the Proposed Development
	▪ Control of bramble and other scrub across the Site in areas of retained grassland to prevent it from overtaking habitats; ▪ Creation of bee banks at two locations across the Site (two bee banks to be created per location) and beetle banks across the Site to increase overwintering hibernation and breeding refuges for a range of invertebrates and encourage increased species diversity; ▪ Installation of bat and bird boxes on retained trees within approximately five locations across the Site to provide additional refuge for bat and bird species; ▪ Creation of new habitats including new hedgerows along sections of the Site boundary and adjacent to the Wales Coast Path Public Right of Way footpath which crosses the Site. Native trees will also be planted around the BESS and substation compound and between existing woodland blocks within and adjoining the Site. These new habitats will provide linear flight lines for protected species such as bats and birds, which over time, will mature and provide established flight line links to the wider landscape; ▪ Planting of an orchard likely within the east of the Site, along with wildflower areas around the orchard and elsewhere within the Site, which will provide a valuable food source for a range of protected and notable species. This will also encourage native invertebrates, including pollinators and night-flying species (enhancing bats foraging opportunities); ▪ Creation of attenuation ponds and marginal wetland habitats; and ▪ Good horticultural practice should be utilised, including the use of peat-free composts, mulches and soil conditioners.

5. Net Benefit for Biodiversity

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

5.1.2. Although the Welsh assessment does not utilise a metric, demonstrating an overall net benefit is often quantifiable. The Welsh approach aims to demonstrate an increase in ecosystem resilience; this is difficult to quantify as ecosystems are complex and dynamic. The Welsh Government and NRW have developed the DECCA framework (see **Section 1.7**), which is utilised for a better understanding of aspects of ecosystem resilience.

5.1.3. The construction of the Proposed Development will result in discrete areas of permanent loss of arable land but this has been minimised across the Site and is limited to the footprint of the BESS and substructure compound and of the internal access tracks. The existing arable land beneath the solar PV arrays will be modified and will continue to be grazed by sheep, albeit managed to be less intensively, allowing the establishment of grasslands of higher greater ecological value.

5.1.4. Habitat enhancement and creation (as described in **Section 3**) will ensure that habitats are enhanced appropriately and according to their importance for biodiversity and ecosystem resilience. This will be achieved by directly strengthening existing habitats (hedgerows and field boundaries) and by creating habitats of higher ecological value to that being lost. All habitat enhancement and creation is to be carried out on-Site, with no off-Site provision required.

5.1.5. The Proposed Development demonstrates a proactive consideration for biodiversity and the wider ecosystem throughout the design process. Where impacts to biodiversity were predicted, following the application of avoidance measures and measures to minimise impacts, mitigation was implemented, and compensation provided. The measures aiming to increase ecosystem resilience are summarised in **Table 5.1**. Each measure's contribution to ecosystem resilience is also discussed using the DECCA Framework. These include; 'Diversity', 'Extent', 'Condition' and 'Connectivity'. It is considered in the framework that when these four factors are in good condition, the habitats' 'Adaptability to change' is enhanced, creating habitats that are more resistant and more likely to recover from external pressures such as unexpected weather events, pollution and climate change.

Table 5.1 - Mitigation and Compensation Measures and their Contribution to Ecosystem Resilience

DECCA objective	Measures taken in the design of the Proposed Development
Diversity	▪ Strengthening of existing habitats through planting up existing gaps within species-poor hedgerows across the Site with native whips, grassland management, grazing management, bracken and scrub control, new planting of hedgerows, trees, orchard and wildflower grasslands and incorporation of natural and artificial ecological features e.g. species habitat provisions, will increase diversity by providing a higher number of ecological niche opportunities within the Site.
Extent	▪ Habitat enhancements including strengthening existing hedgerows and field boundaries, grassland management and planting of new habitats including hedgerows, trees, an orchard and wildflower grasslands, will focus on increasing the extent of higher-quality semi-natural habitat/features and linkages between habitats.
Condition	▪ Strengthening of existing habitats will establish higher quality habitats, such as species-rich hedgerows and or increasing species diversity; and ▪ Increasing the diversity of the sward structure and the species composition will further establish higher quality habitats.
Connectivity	▪ Retaining and strengthening linear features such as hedgerows and field boundaries (by planting up existing gaps with native whips) as far as possible will maintain connectivity and corridors for wildlife; ▪ Improved biodiversity of grasslands through increased diversity and composition of sward, along with the creation of an orchard and wildflower grasslands will contribute to invertebrate corridors and provide continued connectivity across the Site and onto the wider suitable landscape. This will support the protection of the existing B-line which is present within the Site; and ▪ Connectivity will ensure population connectivity and dispersal for a range of protected and notable species, as well as ensuring continued access to potential foraging habitats within and around the Site.
Aspects of ecosystem resilience	▪ Strengthening of existing habitats will improve ecological diversity, condition and connectivity, improving its resilience to climate change, pollution and other external factors.

6. Future Management and Monitoring

6.1.1. To ensure the Proposed Development delivers NBB and ecosystem resilience, it will be necessary to undertake future management and monitoring. This should be undertaken during the construction and operational phase of the Proposed Development.

6.1.2. An outline LEMP has been produced for the Proposed Development (**Appendix 6G: Outline LEMP** of the ES). This identifies the vision and objective for habitat enhancement and creation within the Site along with an outline of the management and monitoring plan envisaged.

6.1.3. A detailed LEMP will be prepared following approval of the Proposed Development, which will set out clear commitments and timeframe for any actions over a 40-year period (for the lifetime of the Proposed Development). It is envisaged that the requirement for a detailed LEMP will be secured through a planning condition.

6.1.4. Post-construction monitoring will determine the efficacy of mitigation measures and help to identify mitigation improvements or changes where necessary. Regular reviews of the detailed LEMP, in collaboration with the Local Planning Authority (LPA), are likely to be required to assess its success and to make alterations where necessary.

6.1.5. At present, it is assumed that monitoring will be required in Years 1, 3, 5 and 10 following planting/implementation of habitat measures, subject to refinement within the detailed LEMP. Monitoring will likely assess:

- Establishment and condition of proposed habitats;
- Achievement of landscape screening and integration objectives;
- Grassland species diversity and sward structure;
- Effects of sheep grazing;
- Hedgerow continuity and structural condition;
- Condition of woodland, tree and orchard planting;
- Condition and use of specialist habitat features; and
- Requirement for remedial or adaptive management.

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

7. Conclusions

7.1.1. In conclusion, the Proposed Development demonstrates a proactive consideration for biodiversity and the wider ecosystem throughout the design process. Where impacts to biodiversity were predicted, following the application of avoidance measures and measures to minimise impacts, mitigation was implemented, and compensation provided. The measures aiming to increase ecosystem resilience include habitat enhancement through:

- Retention of habitats of high ecological value including woodland, scrub, hedgerows and field boundaries wherever possible;
- Site-wide management of existing species-poor hedgerows and supplementary planting and infilling of existing gaps within hedgerows and field boundaries;
- Management of existing grassland through appropriate cutting regimes and the removal of arisings, where required;
- Establishment of a 10 m wide tussocky grassland field margins between retained or proposed hedgerows, tree belts and woodland edges and the adjoining solar PV arrays;
- Maintenance of a varied mosaic of grassland and scrub communities adjacent to the Wales Coast Path;
- Ongoing low-intensity sheep grazing beneath and between the solar PV arrays;
- Creation of new habitats including hedgerows, trees, an orchard and wildflower grasslands across the Site;
- Creation of dedicated Eurasian skylark plots within the eastern-most field of the Site;
- Installation of bee banks, beetle banks; bat boxes and bird boxes across the Site; and
- Provision of habitat piles for reptiles, invertebrates and small mammals.

7.1.2. By following the approach, as laid out within this report and within the oLEMP, the Proposed Development will have the opportunity to fulfil its intention in developing the Larnog Solar Farm, whilst also providing an enhanced area for biodiversity. The measures discussed demonstrate that there is sufficient opportunity to achieve an overall NBB and improve ecosystem resilience.