

# Green Infrastructure Statement



**Pentir Energy Storage**  
**18th January 2024**



**Tyler  
Grange**

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Admin QA	Author	Checked	Approved
NA	Nick Bell BA Hons QCIEEM	Lisa Campbell BSc MA ACIEEM	Lisa Campbell BSc MA ACIEEM

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## Contents:

Section 1: Introduction	1
Section 2: Green Infrastructure Statement	3



# Section 1: Introduction

- 1.1. This statement has been prepared by Tyler Grange Group Ltd on behalf of Lightsource BP. The statement sets out the proposed Green Infrastructure enhancements at land west of Pentir substation (OS Grid Reference SH 55460 67856), hereafter referred to as 'the site'. See **Figure 1.1** for the red line boundary and wider site context.



**Figure 1.1. Red line boundary and wider site context (© Google Aerial Imagery)**

## Purpose, Legislation and Planning Policy

- 1.2. The purpose of this statement is to provide an overview of the existing habitats on site and their condition; full details can be found in the Preliminary Ecological Appraisal (PEA)<sup>1</sup> produced for the Proposed Development. The statement also details potential development impacts (in absence of mitigation) and proposed biodiversity enhancements.
- 1.3. The statement has been produced in accordance with requirements outlined in Chapter 6 of Planning Policy Wales (PPW)<sup>2</sup>, which can be summarised as follows:
- **Green Infrastructure (GI):** stronger emphasis on taking a proactive approach to GI, covering cross boundary considerations, with the submission of a proportionate GI statement with planning applications.
  - **Net Benefit for Biodiversity and the Step-wise Approach:** further clarity is provided on securing net benefit for biodiversity through the application of the step-wise approach, including the acknowledgement of off-site compensation measures as a last resort, and, the need to consider enhancement and long-term management at each step. The use of

<sup>1</sup> Tyler Grange, Preliminary Ecological Appraisal: 14248 R01 Pentir BESS PEA NB 180124

<sup>2</sup> Planning Policy Wales: Addressing the nature emergency through the planning system: update to Chapter 6 of Planning Polciy Wales: <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.gov.wales/sites/default/files/publications/2023-10/addressing-the-nature-emergency-through-the-planning-system.pdf>



the green infrastructure statement as a means of demonstrating the stepwise approach is made explicit.

- **Protection for Sites of Special Scientific Interest:** strengthened approach to the protection of SSSIs, with increased clarity on the position for site management and exemptions for minor development necessary to maintain a 'living landscape'.
- **Trees and Woodlands:** closer alignment with the stepwise approach, along with promoting new planting as part of development based on securing the right tree in the right place.



## Section 2: Green Infrastructure Statement

### Site Baseline

- 2.1. The application site has been subject to an Extended Phase 1 Survey in July 2023, with associated Biodiversity Net Gain assessment and PEA report (full details, including methodologies can be found in the PEA<sup>1</sup>). The site and land immediately adjacent were found to support the following key ecological features:
- Hedgerows (species-poor);
  - Improved grassland;
  - Line of trees;
  - Scattered trees; and,
  - Woodland (offsite: Plantation on Ancient Woodland Site).
- 2.2. The site comprises three species-poor improved grassland fields, of negligible ecological importance. One of the three fields within the site boundary is managed for silage, with the other two fields being managed through sheep and horse grazing. There are two species-poor hawthorn *Crataegus monogyna* hedgerows, a line of trees and scattered trees within the site boundary; there is conifer plantation woodland immediately adjacent to the east, which is categorised as 'Plantation on Ancient Woodland Site'<sup>3</sup>.

### Development Impacts

- 2.3. The proposals relate to the development of an energy storage facility and associated access. In the absence of avoidance and mitigation, the proposals have the potential to impact the habitats of ecological importance, namely the hedgerows, line of trees and scattered trees within the site and the Plantation on Ancient Woodland Site offsite to the east.

### Net Benefit for Biodiversity and the Step-wise Approach

- 2.4. The Proposed Development seeks to follow the Step-wise Approach as detailed within the updated Chapter 6 of PPW<sup>2</sup> by implementing the following:
1. **Avoid:** the vast majority of the development footprint sits within the improved grassland fields, which are of negligible ecological value. The design process of the Proposed Development specifically avoided developing within the field immediately adjacent to the north of the site, due to the condition of this field providing potential suitable habitat for breeding birds and reptiles. Direct impacts on the Plantation on Ancient Woodland Site have been avoided through designing the development footprint 30m from the woodland block.

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<sup>3</sup> Wales Ancient Woodland Inventory 2021: [https://datamap.gov.wales/layers/inspire-nrw:NRW\\_ANCIENT\\_WOODLAND\\_INVENTORY\\_2021](https://datamap.gov.wales/layers/inspire-nrw:NRW_ANCIENT_WOODLAND_INVENTORY_2021)



2. **Minimise:** where the development footprint, including access track, needs to cross existing hedgerows, line of trees and scattered trees, these areas have been reduced as much as possible and have avoided the most mature and high value trees/ shrubs, including their Root Protection Zone (RPZ). This is particularly evident with the line of trees, which were initially wholly due for removal, however, the development footprint was able to shift northwards during the iterative design process, resulting in only a 10 m section of the treeline being removed. Sensitive working methodologies shall be implemented during the construction phase to minimise adverse effects on the existing features.
  3. **Mitigate:** The Plantation on Ancient Woodland Site has been afforded a 30 m buffer from the development footprint, in order to mitigate direct and indirect impacts on this habitat. A Construction and Ecological Management Plan (CEMP) shall be conducted as a Planning Condition, which will detail pollution prevention measures, set out appropriate habitat buffers as described in the PEA and sensitive methods of working. A Landscape and Ecological Management Plan (LEMP) shall be conducted as a Planning Condition and detail the long term management of the created habitats.
  4. **Compensation:** habitat creation works have been designed in the site layout to compensate for the small loss of hedgerow (small loss of hedgerow H2 and small loss of defunct hedgerow H3), line of trees (partial loss of approximately 10 m of the northern section) and scattered trees (loss of T3, T4 and T5 – early mature and self-seeded young trees/ saplings). Habitat creation includes native species-rich hedgerow planting, hedgerow reinforcement planting, 34 newly created trees, copse/ woodland planting, wildflower meadow planting and neutral grassland planting.
- 2.5. The Proposed Development has recognised the need to achieve a Net Benefit for Biodiversity from the outset; this has been built into the planning of the project – through avoiding areas of higher ecological importance, mitigating for potential effects on retained and existing habitats and creating habitats as compensation for those lost.
- 2.6. Although Biodiversity Net Gain (BNG) is not mandatory requirement in Wales, the BNG Metric provides a useful tool for the quantifiable measurement of pre-and-post development habitats, and was therefore used as a guide during the PEA1, the results are as follows:
- The proposed development shall result in the removal of approximately 1.21 ha of ‘Improved’ grassland used for silage and grazing purposes to facilitate the development footprint and access track.
  - The proposed areas comprise approximately 0.86 ha of species-rich wildflower meadow, 0.06 ha of neutral grassland, 0.16 ha of broadleaved woodland/ copse and 34 scattered trees.
  - Retained ecological features such as the remaining section of the line of trees and hedgerows shall also be enhanced through additional species planting, which shall further strengthen those existing ecological features.
  - The propose development would result in a +43.98% net gain in habitat units and a 97.45% net gain in hedgerow units.



2.7. The proposed ecological enhancements fit with the DECCA Framework<sup>4</sup> by:

1. *Increasing diversity within the local ecosystem* by providing species-rich grassland under low intensity management. This will offer habitat which is not common in the local area and will therefore have the potential to support a different and more diverse assemblage of species.
2. *Increasing the extent/ scale of ecosystems* by providing a large block of wildflower grassland, scattered trees and woodland/ copse, which shall bolster the Plantation on Ancient Woodland habitat and provide good quality green infrastructure linkages through the local area and therefore extending the scale of existing ecosystems.
3. *Improving the condition of the ecosystem* by bringing the site under long term conservation management, to be specified within a Landscape and Ecological Management Plan (note that there is no mandatory length of time that management is required for in Wales<sup>5</sup>).
4. *Improving connections within and between ecosystems* through specifically designed locations of proposed habitats, which will provide 'green corridors' through the locale.
5. *Improving ecosystem resilience and adaptability to future pressures* through the planting of trees (carbon capture) and the management of surface water runoff (increased areas of less-managed habitats).

2.8. It is therefore concluded that, as a result of ecological measures embedded within the Proposed Development, it is expected that there will be a demonstrable net benefit for biodiversity. The site has been identified as being relatively low ecological value, with onsite and immediately offsite impacts appropriately avoided and mitigated for. All habitats either retained, created or enhanced will be subject to long-term management with defined biodiversity targets and performance indicators.

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<sup>4</sup> Garrett HM., and Ayling SC. (2021) Terrestrial and freshwater Resilient Ecological Networks: a guide for practitioners in Wales. 43 pp. NRW Report No. 483 Natural Resources Wales. Dolgellau. Available at: <https://cdn.cyfoethnaturiol.cymru/media/693356/resilient-ecologicalnetworks-practitioner-guide.pdf?mode=pad&rnd=132612537900000000>

<sup>5</sup> CIEEM Briefing Paper: Welsh Government Approach to Net Benefit for Biodiversity and the DECCA Framework: [chrome-extension-Benefits-briefing.pdf](#)







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