



Margam Substation Extension

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## **Appendices**

Appendix A Site Location Plan



#### 1 Introduction

- 1.1.1 This Green Infrastructure Statement (GIS) has been prepared by Stantec on behalf of National Grid Electricity Transmission ('the Applicant') to support a planning application to Neath Port Talbot County Borough Council ('the Council'), for a proposed extension to the existing Margam Substation and erection of ancillary buildings ('the Proposed Development) on land adjacent to Tata Steel, Margam, Port Talbot, SA13 2NF ('the Site').
- 1.1.2 The description of development is as follows:

Full planning application for the extension of the Margam 275kV substation including the erection of a gas insulated switchgear hall (GIS hall) and the demolition of the existing control and amenities buildings to enable the erection of a new amenities building. Works to include earthworks, surface water management and drainage infrastructure, lighting, CCTV, boundary treatment, car parking, ecological improvements including a wildlife tower and gabion baskets, improved internal access roads, diesel generator, storage, water storage tank, flood defence wall including flood gates and appropriate landscaping and other associated engineering operations.

- 1.1.3 A detailed overview of the proposed works to the existing Margam 275kV substation compound is provided below:
  - Construction of a GIS hall to house 275 kV electrical switchgear and ancillary equipment;
  - The GIS hall to include 12 bays with the provision of 3 spare bays;
  - Mechanically Switched Capacitor with Damping Network;
  - Realignment of the existing downleads and Super Grid Transformer circuits to new bays within the GIS hall;
  - New amenities building to include welfare facilities, meeting room and ancillary office space;
  - Hardstanding for the freestanding diesel generator to be used in a backup situation only;
  - Security fencing;
  - Surface water management and drainage infrastructure including internal drainage systems;
  - Flood defence wall (1150mm high and depth 1000mm) and flood gates at existing access points into the existing substation;
  - Water storage tank (6m high and 6.1m diameter);
  - CCTV;
  - Lighting to include 6m medium duty, tilt down tubular steel constructure (exact location to be agreed), 27no. 'label C', 18no. 'label E' and 13no. 'label EX1), dark sky approved;
  - Creation of new designated car parking area (four standard bays and two accessible bays);
  - Landscaping to incorporate native planting / wildflowers;
  - Ecological mitigation to include a wildlife tower and gabion baskets;



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- Identified suitable location for the reburial of peat.
- 1.1.4 A detailed overview of the preliminary works is provided below:
  - Proposed new access road into the substation;
  - Re-surfacing of the existing access road;
  - A holding bay on Cefn Gwrgan Road;
  - Permanent watercourse ditch diversion works;
  - Earthworks to include infilling and levelling;
  - Creation of hardstanding.
- 1.1.5 The Site Location Plan is provided at Appendix A, Figure 1 below.
- 1.1.6 This GIS outlines the approach to site development in accordance with the revised Planning Policy Wales (PPW), Chapter 6 (February 2024). It highlights the green infrastructure integrated into the site and the step-wise methodology adopted. The GIS builds upon information already presented in the accompanying drainage strategy, ecological assessments, arboricultural note, and landscape plans submitted as part of the application.
- 1.1.7 The structure of the GIS is as follows:
  - Background and Policy
  - Site Selection
  - Baseline Data and Surveys
  - Step-wise Approach
  - Conclusion and Planning Balance



## 2 Background and Policy

- 2.1.1 Chapter 6 of Planning Policy Wales (PPW) was revised on 18 October 2023, with the changes taking immediate effect as outlined in a Chief Planning Officer letter. One key update, set out in paragraph 6.2.5, is the requirement for all planning applications to be accompanied by a Green Infrastructure Statement (GIS). These revisions have since been incorporated into the updated PPW (Edition 12), published in February 2024.
- 2.1.2 The Proposed Development has been designed to align with the following relevant national and local planning policies:
  - NPT Local Development Plan Policy BE1 (Design) states all development proposals
    must demonstrate high-quality design that reflects the natural, historic, and built
    environment, contributing to attractive, sustainable places. Proposals will only be
    permitted if they meet these criteria.
  - Future Wales: The National Plan 2040, Policy 9 (Resilient Ecological Networks and Green Infrastructure) states that development proposals must enhance biodiversity, strengthen ecosystem resilience, and green infrastructure assets through innovative, nature-based approaches to site planning and design of the built environment.
  - The following placemaking principles outlined in Planning Policy Wales (Edition 12):
    - People & Community: Proposals involve local communities, address diverse needs and well-being, and foster inclusion, equality, and a strong sense of community.
    - Location: Development uses land efficiently, supports existing places, and reduces travel by co-locating homes, jobs, and services.
    - Movement: Prioritises walking, cycling, and public transport with safe, wellconnected routes and integrated transport hubs.
    - Mix of Uses: Encourages diverse uses and tenures to support local businesses, access to services, and vibrant, walkable communities.
    - Public Realm: Streets and spaces are safe, inclusive, and adaptable, with integrated green infrastructure and opportunities for social interaction.
    - Identity: Respects and enhances local character, heritage, culture, and natural features.
- 2.1.3 On June 6, 2024, a pre-application enquiry was submitted to Neath Port Talbot Council, to seek guidance regarding the proposed upgrade of the existing Margam substation.
- 2.1.4 The Council's response was received on September 17, 2024. In their feedback, they outlined several key areas that the applicant must address to support the application effectively. The applicant has acknowledged this response and is committed to fulfilling the Council's requirements, which encompass the following themes:
  - Biodiversity
  - Flooding
  - Design and Visual Impact
  - Highway and Pedestrian Safety



- Contaminated Land and High-Risk Coal
- Noise and Air Quality.
- 2.1.5 The GIS outlines the Applicant's proposed approach to green infrastructure, reflecting the stepwise approach in a way that is proportionate to the development's scale and character.



#### 3 Site Selection

#### 3.1 Site Selection Considerations

- 3.1.1 Stantec undertook a Siting Study on behalf of the Applicant to investigate the most suitable location for the Proposed Substation. This Siting Study identifies potentially suitable locations for the development of the new substation, using constraints mapping, which are then assessed in relation to environmental and socio-economic constraints as well as technical considerations.
- 3.1.2 The site selection process consisted of two primary options:
  - Extending Margam Substation
  - A new Substation

#### 3.2 Proposed Development Site

3.2.1 The Proposed Option of extending the existing substation was chosen for several of the following reasons below.

#### **Proximity to Existing Infrastructure**

3.2.2 The option to extend benefits significantly from its location directly adjacent to the existing Margam Substation. This proximity allows for seamless integration with current electrical systems, reducing the need for extensive new construction. As a result, environmental impacts associated with longer cable routes are minimized. Leveraging existing infrastructure also leads to lower overall construction costs compared to options that would require entirely new facilities in undeveloped areas. Additionally, this setup supports faster development timelines, enabling the project to meet energy demands more swiftly. The site's closeness to the proposed Port Talbot Substation further enhances operational reliability and efficiency, as shorter cable connections contribute to a more dependable electrical supply.

#### **Consideration of Environmental Impact**

3.2.3 While extending does have potential residual effects on the Junction 38 Wetland Complex Site of Interest for Nature Conservation (SINC) including possible habitat loss and disturbance to species from increased light and noise during construction, its location within an established industrial area helps mitigate these impacts. The Junction 38 Wetland Complex SINC is designated for its diverse habitats, including native woodland (H1:3), lowland fen (H9:2), and purple moor-grass and rush pastures (H9:3), which support important species such as water vole, otter, grass snake (Natrix helvetica), common lizard (Zootoca vivipara), reed bunting (Emberiza schoeniclus), and Cetti's warbler (Cettia cetti). The industrial character of the region reduces the sensitivity of the site to such disturbances. Importantly, all other options would also likely affect the SINC due to unavoidable cable routing requirements. Therefore, no option is free from environmental impact, but the location of the extension and the industrial setting helps reduce its visual and ecological footprint. This setting may also lead to greater community acceptance, as residents are more accustomed to industrial activities than those in rural or residential areas.

#### **Peat**

3.2.4 Buried peat without vegetation, found metres below ground, is less common. It no longer acts as a carbon sink but remains a carbon store and is therefore less sensitive than surface peat. Where avoidance is not possible, the key strategy is to minimise excavation and re-bury any removed peat on site to preserve long-term carbon storage.



- 3.2.5 As part of the Siting Study, in terms of geology and soils, GIS mapping was considered which was 'Peatlands of Wales.'
- 3.2.6 NRW have a Peatland Data Portal Map which includes data on habitats that are supported by pear, estimates of the carbon stored in the Welsh peatlands and estimates of greenhouse gas emissions.
- 3.2.7 The peat is present at depth, with no 'active' peat formations present. This is consistent with the review of The Peatlands of Wales Map which does not identify any peatlands within the Site. At the Margam site, peat is buried at varying depths from 0.2 m to 3 m below ground level (bgl). None of the peat is 'active' or sequestering carbon, as there is no vegetation layer. However, buried peat remains a carbon store if waterlogged and not exposed to oxygen.
- 3.2.8 The Construction Peat Management Plan, submitted as part of the planning application, provides an assessment of the expected volumes of peat soils that will require excavation during the construction of the Margam Substation extension. The assessment has included consideration of all the proposed excavation work that have potential to encounter peat soils during the construction process. In accordance with Planning Policy Wales, the Step-Wise Approach has been applied to guide decision-making for this development. A siting study was carried out in line with Step 1 Avoidance which concluded that the selected location is the most appropriate. Subsequent steps have therefore been followed to minimise the potential impacts of the development.
- 3.2.9 The assessment indicates that 2,010 m3 peat soil will be excavated as a result of the development, of which 1,956 m3 would be suitable for reburial. This peat soil will be reburied at the identified locations near the proposed Margam substation. The proposed material storage area is in excess of the expected excavation volumes, providing a level of contingency in the event that more peat soil is encountered and to allow for bulking of the peat soil as it is likely to be mixed with other soil materials during construction operations.

#### **Access and Traffic Considerations**

3.2.10 The extension offers excellent accessibility via existing roads, which minimises the need for new access routes that could disrupt local traffic and communities. This is especially beneficial during the construction phase, when increased traffic could otherwise affect nearby residential and commercial properties. The availability of existing access routes also facilitates the construction of supporting infrastructure reducing the overall environmental and infrastructural impact.

#### **Minimal Heritage Impact**

3.2.11 The extension is located at a sufficient distance from significant heritage sites, and the natural landform provides effective screening. This ensures that the development will have minimal impact on historical and cultural assets in the area, preserving the integrity of the region's heritage.

#### 3.3 Summary

3.3.1 A comprehensive range of factors has clearly shaped the detailed site selection process for the proposed substation, including careful consideration of ecological and biodiversity impacts. The chosen site represents the most cost-effective and environmentally responsible option within the Applicant's Siting Study Area with the greatest benefit for green infrastructure.



## 4 Baseline Data and Surveys

- 4.1.1 The following surveys, assessments and plans have informed the GIS:
  - Ecological Impact Assessment (Stantec, 2025);
  - National Vegetation Classification Survey (Stantec, 2025);
  - Interim Bat Survey Report (Stantec, 2025);
  - Wintering Birds Survey Report (RSK, 2025);
  - Breeding Birds Survey Report (Stantec, 2024);
  - Interim Invertebrate Survey Report (Stantec, 2025);
  - Water Vole and Otter Survey Report (Stantec, 2025);
  - Reptile Survey Report (Stantec, 2025);
  - Great Crested Newt Survey Report (Stantec, 2025);
  - The Tree Survey (RSK, 2025);
  - Peat Management Plan (WRC, 2025);
  - Siting Study (Stantec, 2025);
  - Surface Water Management Plan (Laing O Rourke, June 2025);
  - Landscape and Habitat Strategy Plan (Stantec, 2025);
  - Landscape and Habitat Detailed Plans (Stantec, 2025); and
  - Landscape and Ecological Management Plan and Biodiversity Management Plan (Stantec, 2025); and
  - Habitat Management Plan, Margam Burrows (Stantec, 2025).
- 4.1.2 These documents are drawn upon to clarify green infrastructure detail throughout this Statement. Generally, first thirteen documents establish the baseline conditions and the final five present mitigation strategies and enhancements.

#### 4.2 Operational Factors Affecting Biodiversity and Landscape Design

- 4.2.1 Considering the operational factors the following potential impacts could arise as a result of the Proposed Development:
  - Direct loss and disturbance to habitats and associated SINC.
  - Fragmentation of green and blue links through the Site and beyond
  - Adverse effects to the Site, neighbouring land designated sites due to more distant environmental effects e.g. air quality, noise, drainage or lighting.
  - Disturbance or killing/injury to protected or notable species either due to direct impacts on habitats used by the species or due to disturbance from, for example, lighting, traffic.



 Improvement of the hydrological function of the Site through the restoration and improvement of existing swales which are currently non-functional.

4.2.2 A detailed assessment is presented within section 5 of the EclA.



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## 5 Stepwise Approach

#### 5.1 Avoidance Measures

- 5.1.1 In accordance with the stepwise approach outlined in Planning Policy Wales (Edition 12, 2024), a comprehensive Siting Study was undertaken to identify a preferred location for the proposed 275kV GIS substation (Stantec, 2025). The study assessed ten potential sites, with five shortlisted for detailed appraisal. Each site was evaluated against environmental, technical, and socio-economic criteria, including proximity to designated ecological sites, landscape sensitivity, access, and integration with existing infrastructure.
- 5.1.2 The selected option, located directly adjacent to the existing Margam Substation, was identified as the preferred site and is the Site considered as the Proposed Development within this Green Infrastructure Statement, as stated above in section 4.2. While the option location lies within the Junction 38 Wetland Complex Site of Importance for Nature Conservation (SINC), the Siting Study concluded that no alternative site could avoid impacts on designated ecological sites. All other options would result in either direct or indirect impacts on the SINC or other designated sites (e.g. SSSIs or ancient woodland) due to the required cable routing or substation footprint.
- 5.1.3 The study demonstrated that avoidance of impact on the SINC is not possible, and that extension of the substation represents the most sustainable and deliverable option when considered against the full range of planning and environmental constraints as described within the Ecological Impact Assessment (EcIA; Stantec 2025).

#### 5.2 Minimisation of Impacts

- 5.2.1 Following the Siting Study, various options for the design of the substation were considered. The primary aim of the design was to minimise the footprint of the Proposed Development, such that permanent impacts on the SINC would be as small as possible. In addition, the design minimises impacts beyond the footprint of the substation itself on the retained area of the site (e.g. through consideration of lighting design and restricting temporary construction areas to a minimum).
- 5.2.2 At the Margam site, peat is buried at varying depths from 0.2 m to 3 m below ground level (bgl). None of the peat is 'active' or sequestering carbon, as there is no vegetation layer. However, buried peat remains a carbon store if waterlogged and not exposed to oxygen.

#### 5.3 On-Site Mitigation and Compensation

- 5.3.1 The landscape plans provide details of the on-site mitigation and enhancements. These are:
  - Landscape Plan MAREXT-STN-XX-XXX-DR-LA-0001
  - Landscape Mitigation Area Planting Plan MAREXT-STN-XX-XXX-DR-LA-0002
  - Landscape SuDS Indicative Sections and Specification MAREXT-STN-XX-XXX-DR-LA-0003
  - Landscape Strategy Plan MAREXT-STN-XX-XXX-DR-LA-0004; also presented within the LVA as Figure L8.
- 5.3.2 The landscape plans detail how the temporary works areas will be restored as well as GI improvements through habitat and planting design based upon the findings of the EcIA, the Tree survey and the Peat Management Plan. The principal GI improvements are:



- Restoration of the temporary works areas through natural regeneration. The ground will be suitably prepared and seeded with a nurse grass species (*Lolium multiflorum*, annual Westerwold Ryegrass), preventing erosion and allowing the natural seed bank to establish.
- Planting of a diverse selection of suitable trees in small blocks in the northwest corner of the Site.
- Maintaining a Sustainable Drainage System (SuDS) detention pond with an area of permanent water, this is hydrologically and ecologically linked both internally and externally of the Site.
- The restoration of functional ditches which are seeded with an appropriate marginal species. This will restore the Site to a hydrological condition present when the SINC was designated in 2009 and will gradually re-establish the diverse range of wetland habitats that were found throughout the Site and link to and support the neighbouring external wetland habitats.
- 5.3.3 The Landscape and Habitat Management Plan (LHMP) for the Site (Stantec, 2025) describes the Site mitigation and compensations measures in more detail and includes the following measures:
  - Assumption of full restoration of soils and replacement vegetation cover through natural regeneration using site-won topsoil following Permitted Development works.
  - Restoration and realignment of ditches to improve hydrological and ecological function.
  - Installation of water control structures to maintain hydrological and ecological function and to provide enhancement to SINC conditions.
  - Provision of species-specific features including a wildlife tower, reptile hibernacula, and gabion baskets.
  - Lighting design to maintain dark corridors for bats and other nocturnal or crepuscular species.
  - Rotational management of reedbed, marginal vegetation, and scrub following completion of construction of Proposed Development to provide enhancement to SINC.
  - Monitoring of water levels, vegetation structure, and target species following completion of construction of Proposed Development to provide feedback and inform adaptive management response to provide enhancement to SINC.
- 5.3.4 The loss and temporary damage to habitats due to the development proposals represents a reduction in habitat area and a small fragmentation of the existing GI network, however the opportunity to restore hydrological function to the Site represents an improvement that should enable the restoration of ecological function in line with the SINC designation that was assigned in 2009. As swales have become silted and blocked up, the Site has become more inundated causing the transition to a monoculture reedbed habitat. The SINC designation was granted due to a diverse array of wetland habitats trending along a hydrological gradient from reedbeds in the north to drier grassland on the south of the Site. Restoration of this hydrological and ecological gradient has GI benefits within the Site and for the rest of the neighbouring SINC area.
- 5.3.5 Buried peat without vegetation, found metres below ground, is less common. It no longer acts as a carbon sink but remains a carbon store and is therefore less sensitive than surface peat. Where avoidance is not possible, the key strategy is to minimise excavation and re-bury any removed peat on site to preserve long-term carbon storage.



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- 5.3.6 At the Margam site, peat is buried at varying depths from 0.2 m to 3 m below ground level (bgl). None of the peat is 'active' or sequestering carbon, as there is no vegetation layer. However, buried peat remains a carbon store if waterlogged and not exposed to oxygen.
- 5.3.7 Three principal construction techniques for the substation extension may interact with peat soils:
- 5.3.8 Excavation: Involves bulk removal of ground materials for foundations.
- 5.3.9 Driven piling: Pre-cast concrete piles are forced into the ground without excavation.
- 5.3.10 Augered piling: A hole is bored and filled with concrete in-situ, involving limited excavation.
- 5.3.11 Driven piling displaces peat but keeps it underground and waterlogged, preserving its carbon storage. Augered piling may bring some peat to the surface, requiring storage and later disposal. Both piling methods disturb less ground than excavation, and the total volume of disturbed peat is expected to be minor. Excavation for foundations is shallow, up to 1 m deep.
- 5.3.12 The Construction Peat Management Plan, submitted as part of the planning application, provides an assessment of the expected volumes of peat soils that will require excavation during the construction of the Margam Substation extension. The assessment has included consideration of all the proposed excavation work that have potential to encounter peat soils during the construction process. In accordance with Planning Policy Wales, the Step-Wise Approach has been applied to guide decision-making for this development. A siting study was carried out in line with Step 1 Avoidance which concluded that the selected location is the most appropriate. Subsequent steps have therefore been followed to minimise the potential impacts of the development.
- 5.3.13 The assessment indicates that 2,010 m3 peat soil will be excavated as a result of the development, of which 1,956 m3 would be suitable for reburial. This peat soil will be reburied at the identified locations near the proposed Margam substation. The proposed material storage area is in excess of the expected excavation volumes, providing a level of contingency in the event that more peat soil is encountered and to allow for bulking of the peat soil as it is likely to be mixed with other soil materials during construction operations.
- 5.3.14 Approximately 54 m3 peat soil is expected to be excavated as a result of augered piling operations. As a result of the augering process, this peat soil will be mixed with other soil and rock materials and it will not be possible to separate out the peat soils from these other materials. The mixed arisings will be removed from site for disposal at a suitably licensed facility.
- 5.3.15 The immediate reburial or careful storage and reburial of excavated peat soils will help to minimise carbon loss during the excavation process and to prevent long-term carbon loss once the peat soil is reburied and capped.

#### 5.4 Off-Site Compensation and Enhancement

- 5.4.1 To deliver benefit for GI, a complementary off-site enhancement scheme is proposed on Tata Steel land at Margam Burrows (Stantec, 2025). The areas covered by this enhancement scheme are local enough to have an ecological connection with the Site, strengthening the GI network. The scheme will be secured thrugh a section 106 or simillar mechanism. The scheme includes:
  - Scrub removal around existing dune slack ponds to improve conditions for great crested newt.
  - Creation of new dune slacks in low-diversity areas.
  - Reuse of excavated sand to create open dune habitat and opening up closed-sward on south-facing dunes to benefit invertebrates and early successional species.



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- Installation of multifunctional gabion basket features using clean slag provided by Tata Steel as part of the on-site landscape design (see landscape plans MAREXT-STN-XX-XXX-DR-LA-0001 to MAREXT-STN-XX-XXX-DR-LA-0004; Stantec, 2025).
- Rotational scrub management, particularly targeting species such as grey willow and sea buckthorn to maintain balance between dune grassland and scrub.
- Dune slack rejuvenation on a 4–5 year cycle.
- Monitoring and adaptive management to maintain habitat quality and species diversity.



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#### 6 Conclusion

- 6.1.1 The Proposed Development has been carefully designed to align with the revised requirements of Planning Policy Wales (Edition 12), and with NPT Local Development Plan Policy BE1 (Design), ensuring that green infrastructure considerations are integrated into all stages of site selection, design, mitigation, and long-term management. The extension of the existing Margam Substation has been identified as the most suitable option due to its proximity to existing infrastructure, lower environmental impact, and operational efficiencies. The development proposals also demonstrate high-quality design that reflects the natural and built environment and is both attractive and sustainable demonstrated through the landscape design.
- 6.1.2 While the development is located within the Junction 38 Wetland Complex SINC, the Siting Study confirms that all alternative locations would have equal or greater impact on designated sites. Therefore, the chosen site represents the most appropriate and deliverable option. Through a stepwise approach, the design has sought to avoid, minimise, and mitigate impacts, while implementing meaningful on- and off-site enhancements to support biodiversity and ecological connectivity.
- 6.1.3 On-site measures include restoration of ditches to reinstate the site's natural hydrological function, native planting, habitat creation, and the provision of species-specific features such as a wildlife tower and gabion baskets. These enhancements aim to restore the ecological diversity that led to the SINC designation and strengthen the wider green infrastructure network.
- 6.1.4 Off-site compensation at Margam Burrows further contributes to biodiversity net benefit and ecosystem resilience through targeted habitat creation and management. These actions are designed to have a measurable positive impact on key species and habitats, enhancing both local and regional green infrastructure.
- 6.1.5 Whilst the removal of any peat will be avoided as far as possible, any peat removed will be stored and reburied accordingly. Whilst peat removal has not been entirely avoided, in accordance with the Step Wise process, suitable mitigation has been identified in terms of peat.
- 6.1.6 In summary, the approach outlined in this GIS demonstrates a comprehensive and proportionate response to the site's environmental context. The measures proposed seek to not only reduce the impacts of development but also deliver long-term improvements for biodiversity, climate resilience, and ecosystem functionality, in accordance with Welsh planning policy and sustainability principles.



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## Appendix A Site Location Plan



