
Brogan Solar Farm

on behalf of Fuse Renewables Ltd.

Appendix 5: Net Benefits for Biodiversity (NBB) Statement



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1 INTRODUCTION

- 1.1.1 This Net Benefits for Biodiversity ('NBB') Statement has been prepared in relation to the proposed installation of a solar farm and associated infrastructure (the 'Proposed Development') on land located to the east of the B4393 near Llanfyllin, North Wales, SY22 5LQ; central Ordnance Survey (OS) grid reference: SJ 17662 18915 (hereafter referred to as the 'Site').
- 1.1.2 This document aims to demonstrate that the Proposed Development will leave biodiversity and ecosystems in a better state than before (i.e., deliver NBB), and that the planning application follows the Welsh Government's policy requirements of the stepwise approach using the DECCA framework¹.
- 1.1.3 This NBB statement should be read in conjunction with the *Detailed Landscape Proposals* (Drawing Number: P25-0182_EN_001; REV: C) produced by Pegasus Group, as well as the *Proposed Layout Plan* (Drawing Number: BGS.LYT.DEV.06; REV: 06) produced by Fuse Energy Ltd. These plans respectively illustrate the Proposed Development's landscaping and layout design. This report should also be read with the *Ecological Assessment Report*² (EAR) and corresponding *Appendix 6: Biodiversity Management Plan* (BMP) that are both produced by Avian Ecology Ltd. (AEL).

2 GUIDANCE AND METHODOLOGY

- 2.1.1 A full list of relevant legislation, policy and guidance is detailed in the EAR, however key to the NBB statement refer to the following:
- The Environment (Wales) Act 2016;
 - Planning Policy Wales (PPW) (Edition 12) (Welsh Government Llwodraeth Cymru, 2024) – Chapter 6 Distinctive and Natural Places (Welsh Government (2009);
 - Future Wales: The National Plan 2040;
 - Natural Resources Wales (2020) State of Natural Resources Report (SoNaRR) Assessment of the sustainable management of natural resources;
 - Powys Local Development Plan (2011 – 2026); and,
 - The Powys Nature Recovery Action Plan (2022 – 2032).
- 2.1.2 PPW 12 Section 6.4.3 sets out the responsibilities of the Local Planning Authority when assessing development proposals and their impacts on biodiversity. This document states:
- 'The planning system has a key role to play in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement.'*
- 2.1.3 It sets out the requirement for planning authorities to demonstrate that they have sought to fulfil the duties and requirements of Section 6 of the Environment (Wales) Act 2016 by taking all reasonable steps to maintain and enhance biodiversity.
- 2.1.4 Any proposed biodiversity enhancements must be appropriate to the local and national environment, considering strategic plans, local strategies, and evidence like area statements. A key principle of NBB

¹ <https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf> (Accessed: 7th January 2026).

² Avian Ecology Limited (2026). *Brogan Solar Farm: Ecological Assessment Report*.

is that biodiversity enhancement should be proportionate to the scale and nature of the Proposed Development.

2.1.5 It is advised that developments in Wales must therefore demonstrate they have maintained and enhanced biodiversity and created resilient ecological networks, by following a stepwise approach. PPW 6.4.15 outlines the stepwise mitigation hierarchy that authorities will follow in assessing impacts on habitats and species. The key steps in the qualitative assessment are:

- 1) Avoid impacts through considering alternative sites;
- 2) Minimise impacts through design;
- 3) Mitigate/restore any residual impacts on-site to build resilience;
- 4) Compensate off-site only as a last resort;
- 5) Provide a long-term management plan alongside steps 1-4 to achieve net benefit; and,
- 6) Refuse permission if steps 1-4 fail or no management plan provided.

2.1.6 In addition, to assist in evaluating ecosystem resilience, Natural Resources Wales (NRW) has developed the “DECCA Framework” based on five key attributes that planning authorities must consider under PPW section 6.4.5. These resilience attributes include Diversity, Extent, Condition, Connectivity and Adaptability to change (see **Table 2.1**). Together the assessment utilises the DECCA resilience attributes and the stepwise mitigation hierarchy to outline the measures by which the Proposed Development will contribute towards NBB.

Table 2.1: The DECCA Framework (adapted from PPW (Edition 12)).

Attribute	Description
Diversity	More diverse ecosystems are more resilient to external influences (this includes biological, geological and physical diversity on a site). This means strategic planning and individual development proposals should avoid negative impacts on biodiversity by considering how biodiversity assets can be maintained and enhanced.
Extent	The size of an ecosystem will affect its capacity to adapt, recover or resist disturbance. Strategic planning and individual development proposals must avoid loss in the extent of biodiversity and incorporate measures to appropriately maintain and enlarge existing habitats, especially where extent is small or declining, through habitat restoration and creation with adjoining and nearby areas, green infrastructure features and networks.
Condition	Ecosystems and biodiversity assets need to be in a healthy condition to function effectively, to deliver a range of important ecosystem services and be more resilient to external influences. Good condition requires sufficient scale and functioning natural processes or appropriate management to provide structural complexity and sustain diverse mosaics of habitats. Strategic planning and individual

	development proposals must not compromise the condition of ecosystems.
Connectivity	Connectivity refers to the links between and within habitats, which may take the form of corridors, stepping stones or patches of the same or related vegetation types. Environmental factors such as geology, soil type or hydrological links affect sea / landscape connectivity. For any given species, connectivity is related to the relative distance that species can move to feed, breed and complete lifecycles that may need different environments. Individual development proposals should identify and incorporate measures which enable appropriate links to be made between the site and its surroundings so as to improve connectivity.
Adaptability to change	Resistance and recovery from pressures arise when the attributes of ecosystem resilience – diversity, extent, condition and connectivity of ecosystems are in good condition. Habitats and species are not static: planning for nature recovery should aim to sustain habitats and associated species as the geography and land use changes around them, harnessing natural processes and opportunities for nature-based solutions. This means that strategic planning and individual development proposals should identify impacts to the ecosystem resilience attributes of biodiversity, using the pressures identified in SoNaRR.

3 ECOLOGICAL BASELINE- PRE-DEVELOPMENT

- 3.1.1 Detailed descriptions of baseline ecological conditions can be found in the EAR.
- 3.1.2 The Proposed Development is predominantly located within a rural landscape, on agricultural land located to the east of the B493 and located c. 2.5 km east of the town of Llanfyllin in North Wales. The Site is c. 12.1 hectares (ha) in extent. The Site is shown on **Figure 1** of the EAR.
- 3.1.3 The Proposed Development is comprised of an installation of a 7 MW solar farm with any required infrastructure.
- 3.1.4 Habitats within the Site comprised of modified grassland pasture, with boundary features of tree lines and hedgerows (including one species-rich section) between the individual fields. A small stand of non-native conifers was present within the southwestern extent of the Site. Three individual trees were recorded at the Site. All were mature oak trees, and some supported veteran features. No ponds were identified within the Site, with two situated within 250 m of the Site boundary.
- 3.1.5 Access to the Site is via the B4393 road directly to the west of the Site.

4 ASSESSEMENT

4.1 Overview

- 4.1.1 This section comprises the qualitative 'stepwise approach' assessment that has been followed to avoid, minimise, mitigate and compensate impacts resulting from the Proposed Development. Habitat enhancements are also detailed. A summary of the stepwise approach using the DECCA Framework is presented in **Table 4.1**.
- 4.1.2 Full details of proposed ecological mitigation measures, enhancements, habitat management and ecological monitoring are provided in the EAR and Appendix 6: BMP.

Table 4.1: A summary of the stepwise approach using the DECCA Framework taken to deliver NBB for the Proposed Development.

Receptor	Avoid	Minimise	Mitigate	Compensate	Enhancement
Designated sites	Considered sufficiently distanced to avoid direct and indirect impacts. Tanat and Vyrnwy Bat Sites / Safleoedd Ystlumod Tanat ac Efyrynwy Special Area of Conservation (SAC) support up to 4% of the UK lesser horseshoe population. No lesser horseshoe roosts will be impacted. Foraging and commuting impacts to the species are discussed below.	NA	HRA to undergo Appropriate Assessment (AA).	NA	Increased foraging and commuting opportunities via proposed habitat enhancements.
Habitats	Existing features of biodiversity value would be largely retained and protected. All retained trees within the vicinity of construction areas would be protected during construction works in-line with BS 5837:2012 Trees, in relation to design, demolition and construction. Pollution prevention measures would be implemented to prevent pollution and run-off occurring during the construction phase.	Direct loss of habitat is small and will comprise mostly of low ecological value agricultural habitat. Some minor vegetation removal and pruning will be required to enable site access. The majority of proposed access tracks will largely exploit existing gaps in hedgerows.	Translocation of 11.5 m of species-rich hedgerow within the Site.	See enhancements.	Native tree (49 trees) and whip (14 whips) planting. Hedgerow planting (106 m, plus 324 m of infilling of existing gaps). Creation of a single pond (c. 0.06 ha) with 40 m pre-planted coir matting and wetland margins (0.05 ha). Development of extensive areas of species and structurally-diverse grassland under and around the solar panels (8.01 ha), including a meadow (c. 2.48 ha) and perimeters of wildflower grassland (1.15 ha).

					Creation of mixed scrub (0.04 ha).
Birds	All boundary habitat features are to be retained and protected during the construction phase of the Proposed Development.	Removal/loss of nesting bird habitats would be undertaken outside of the bird breeding season (1st March to 31st August inclusive). During operation, disturbance will be limited to intermittent maintenance activities. If vegetation works are necessary during the breeding season, suitable nesting habitat would be searched by a suitably experienced ecologist prior to works commencing. Only when the ecologist is satisfied that no offence would occur under the legislation would works be permitted to proceed.	If a nesting bird species is identified, a suitable work exclusion zone will be established around the nest site and a Breeding Bird Protection Plan will be required.	See enhancements.	Breeding and non-breeding species would benefit from the additional native species planting and pond creation proposed within the Site. Installation of five bird boxes on mature trees within the Site.
Bats	Existing features of biodiversity value would be largely retained and protected. All retained trees within the vicinity of construction areas would be protected during construction works in-line with BS 5837:2012	Should any trees be impacted, a GLTA will be undertaken to determine if trees offer potential bat roost features. Additional requirements may include further surveys including	If bats are confirmed to be roosting within any tree to be impacted by proposed works, the data gathered would be used to support a licence application to NRW to destroy/disturb the bat roost and to inform	NA	Habitat enhancements at the Site include five bat boxes on mature trees within the Site. Increased foraging and commuting opportunities via proposed habitat enhancements.

	Trees, in relation to design, demolition and construction. There is not any suitable roosting habitat present suitable to support lesser horseshoe bats, potentially associated with statutory designated site populations to be roosting on-Site. No negative foraging and commuting impacts as artificial lighting will not be used once operational.	dusk emergence surveys or inspections at height. If any artificial lighting is required during construction, it shall be in accordance with current guidance 'Guidance Note 08/23: Bats and artificial lighting at night' (BTC, 2023).	potential mitigation measure to reduce and/or avoid impacts if appropriate.		
Badger	No badgers within the Site. Existing features of biodiversity value would be largely retained and protected.	A pre-construction survey should be undertaken two weeks prior to the commencement of works to determine if any new setts have been created. Two-way mammal gates will be installed at regular intervals within the perimeter fencing to allow the continued movement. Works conducted under PWMS.	If a new sett is found to be present, a suitable buffer of up to 30 m would be implemented from all active badger setts. If this is not possible a NRW licence would be obtained.	NA	Increased foraging, commuting and sett excavation opportunities via proposed habitat enhancements.
Otter and water vole	No water vole or otter recorded within the Site. Two water courses are located within proximity to the Site. It is considered that works are sufficiently distanced from watercourses that, if present, otter	Two-way mammal gates will be installed at regular intervals within the perimeter fencing to allow the continued movement.	NA	NA	Increased terrestrial foraging and commuting opportunities via proposed habitat enhancements.

	or water vole would not be directly adversely impacted by the Proposed Development. Pollution prevention measures would be implemented to prevent pollution and run-off occurring during the construction phase to off-Site aquatic habitats. Dark terrestrial habitat corridors will be maintained via positioning of any artificial lighting. Existing features of biodiversity value would be largely retained and protected.				
Hazel dormouse	Existing features of biodiversity value would be largely retained and protected. All retained trees within the vicinity of construction areas would be protected during construction works in-line with BS 5837:2012 Trees, in relation to design, demolition and construction	Any works within suitable habitat, such as hedgerows, will follow a PWMS under the supervision of a licensed ecologist to avoid any risk of adverse effects on hazel dormice specie.	If a hazel dormouse is found during site clearance or construction periods, works must stop immediately, and contact should be made with a suitably qualified / licenced ecologist for advice. Further works potentially affecting dormice would require a European Protected Species Mitigation Licence to legally proceed.	See enhancements.	Increased foraging and commuting opportunities via proposed habitat enhancements.
Amphibians and reptiles	GCN are likely present within suitable terrestrial habitat on-Site and within the locale.	To protect individual amphibians and reptiles, any works within suitable habitats works will be	Should a great crested newt be found at any point during construction, works within suitable	See enhancements.	Installation of one hibernacula. Increased breeding, foraging and commuting

	Habitats to be lost to the Proposed Development primarily consist of modified grassland, which is of low ecological value for amphibians and reptiles. Habitats of higher ecological value are to be retained by the Proposed Development. Standard measures to ensure run off control and pollution prevention will be used to protect aquatic and associated terrestrial habitats and ensure no indirect effects on amphibians and reptiles.	conducted under the supervision of a licensed ecologist following a PWMS.	habitat and/or potentially disturbing works in close proximity to the great crested newt must cease immediately and the ECoW will advise on the appropriate actions, including applying for a licence, if required. Should a reptile or other amphibian species be found the animal should be allowed to move away of its own accord. If necessary, the ECoW will translocate the individual animal within a designated receptor area (such as woodland) comprising of terrestrial habitats which will not be impacted by the proposed works and has excellent connectivity with surrounding terrestrial habitats.		opportunities via proposed habitat enhancements.
Other species	Existing features of biodiversity value would be largely retained and protected.	Two-way mammal gates will be installed at regular intervals within the perimeter fencing to allow the continued movement. Works conducted under PWMS.	Should a notable species be found, the animal should be allowed to move away of its own accord. If necessary, the ECoW will translocate the individual animal within a designated receptor area.	NA	Installation of five insect boxes/hotels and one hibernacula. Increased terrestrial foraging and commuting opportunities via proposed habitat enhancements.

5 SUMAMRY

- 5.1.1 With the implementation of the avoidance, minimisation, mitigation, compensation and enhancement measures outlined in **Table 4.1**, it is considered that the Proposed Development demonstrates adherence with the stepwise approach using the DECCA Framework and will deliver a NBB.