

Scheme of GCN Reasonable Avoidance Measures

Legacy, Cable Corridor Route (P/2024/0155)

To manage and mitigate the variable risk of directly impacting GCN as a result of the installation of cables in relation to the Energy storage Scheme off Bronwylfa Road, it is recommended that the following approach is taken.

The attached GCN Constraints Map highlights areas of High risk and areas of Medium risk of encountering/harming/disturbing. Those areas not specifically highlighted are considered to be of Low risk.

The following approaches will be applied to works within each of these risk areas¹.

HIGH Risk

An EPS Licence will be required for works taking place within High Risk areas. This is because these areas comprise highly suitable terrestrial or aquatic habitat for GCN and the species is known to be present locally; specifically within the existing Legacy Substation.

The only exception where a licence may not be required, is when works can avoid all potential impacts within these areas by directional drilling or other trenchless techniques.

MEDIUM Risk

The following Reasonable Avoidance Measures (RAMs) are to be implemented for works within Medium Risk areas – primarily hedgerows. This is because these areas are likely to be used by GCN but on a less frequent basis (e.g. for dispersal). Furthermore, the anticipated impacts in these areas are short-term, temporary and reversible.

- All site workers will be given a Toolbox Talk relating to GCN. This will include their legal status, an identification guide and a review of this document detailing the process to follow during site works and in the event of encountering any amphibians.
- Initial cut of hedgerow vegetation to 150mm above ground. Ground is not to be disturbed during this process. Due to risk of encountering hibernating amphibians within hedge-bottoms, this stage is best carried out during the period March to October inclusive. Care must be taken with regards to the potential for nesting birds. All cut vegetation is to be removed from site immediately. Area to be left for 24 hours.
- Hand search of the cut area by a GCN licensed ecologist. Any amphibians found will be safely translocated to a nearby place of safety (to be agreed in advance with the County Ecologist). Immediately following hand search, the hedge will be removed with care and under the direct supervision of the GCN licensed ecologist. A toothed bucket will be used to carefully lift root-balls in such a way that a) they can be checked for amphibians and b) they can potentially be re-planted post installation of cables.
- Once the hedge has been removed, installation of the cables will take place as soon as feasibly possible.

¹ It is noted that the preferred cable route has yet to be determined. As a result, the precise methods of installation are also unconfirmed.

- Reinstatement measures are to be provided by the applicant. Where possible, root-balls should be retained and stored appropriately so that they can be re-instated rather than requiring a full re-plant of the hedge. Where this is not possible, hedges should be re-planted using a mix of native species and subject to management until such time as plants are fully established.
- If significant numbers of GCN are encountered (e.g. >5 individuals) in any single hedge crossing, works in the area of the discoveries should cease immediately and a review of the risk to GCN undertaken. This may require a revised methodology or the application for a GCN Licence.
- During installation works;
 - all materials will be stored off-ground on stillages or pallets.
 - all rubble/spoil/earth arising from works is skipped or removed from site on a daily basis.
 - any excavations left overnight will be back-filled and sealed with the back of a machine bucket to prevent amphibians from gaining access to them.
 - pre-start checks of the working area will be undertaken each morning, looking for any amphibians.
 - all site workers will be made aware of the potential presence of amphibians and an identified sheet will be kept on site in case any of these animals are encountered.

The above RAMs have been designed such that Medium Risk areas can be carefully cleared without harming GCN (or any other protected/notable species) and that subsequently the site is unsuitable for these species to utilise in the short-term, so that they do not take refuge within the working area.

LOW Risk

Low risk areas are those without any suitable terrestrial habitat for GCN, e.g. cropland or intensive grazing pasture. In these areas, it is highly unlikely that GCN will be present.

For these areas the cable corridor working area will be subject to a pre-commencement inspection by a GCN-licensed ecologist. Hand-searches and/or supervision may be required in any areas where there is suitable vegetation cover or structure, that might support GCN or other amphibians. This will be advised by the ecologist.

When topsoil is stripped from the cable route, it is to be stored adjacent to the trench for as short a period as possible. The topsoil mound will be sealed using the back of a machine bucket at the end of each day, to deter any amphibians from using it as a place of shelter.

Prepared by: Russell Grey

Prepared on: 13th January 2025

SITE LOCATION PLAN

AERIAL IMAGERY

PROPOSED LAYOUT PLAN