

GWENT FARMERS' COMMUNITY SOLAR PARTNERSHIP LIMITED

Company number 08591067

Prif Swyddog Cynllinio
Tim yr Dwyrain
Adfywio a Datblygu Economaidd
Cynor Dinas Casnewydd

Principal Planning Officer
East Team
Regeneration and Economic Development
Newport City Council

Sent by email to geraint.roberts@newport.gov.uk

01 August 2025

Dear Geraint

**RE: Response to Stakeholder Representations on the Discharge of Condition 14
(Ecological Monitoring and Contingency) for Llanwern Solar Scheme**

We are writing in response to representations received from Natural Resources Wales (NRW), the Royal Society for the Protection of Birds (RSPB), and Friends of the Gwent Levels (FoGL) regarding Application Ref 25/0237 - Further partial discharge of Condition 14 (ecological monitoring & contingency) of planning permission 18/1201 for erection of a renewable energy hub (49.9mw) and associated infrastructure and landscaping in relation to Year 4.

We would like to thank all consultees for their feedback and concern on the Year 4 Ecological Monitoring Report and associated site management activities. This letter addresses the key points raised and outlines our commitment to implementing contingency actions where needed, consistent with the principles of the approved Landscape and Ecological Management Plan (LEMP) and the Ecological Monitoring & Contingency Plan.

1. Commitment to LEMP Delivery and Adaptive Management

Gwent Farmer's Community Solar Partnership discussed many of the points raised by Newport City Council (NCC) and NRW on Thursday 01 May 2025. This is prior to the representations regarding the request for partial discharge of Condition and so these do not fully reflect current next steps with regard to management of the site. Our intent here is to provide further information to build on, support and align with those discussions, and reassure consultees that the development and associated management of the site continues to be carried out fully in accordance with the proposals and plans set out in the planning conditions and associated plans.

We acknowledge that some Year 4 ecological management objectives, particularly for Lapwing and Shrill Carder Bee (SCB), have not yet been fully achieved. However, nature is not static and the purpose of Adaptive Management is to reflect and be responsive to changes in context. To this end, the ongoing monitoring at Llanwern has been effective in identifying where interventions are needed, allowing management to be adapted or refined to ensure that habitats remain on the right trajectory to support the target species. We emphasise that the LEMP was designed as a long-term adaptive strategy over the project's lifespan. As reflected in meetings with NRW and NCC (May 2025), several adaptive management actions are already underway or planned for Year 5. This continued active engagement and collaboration demonstrates the effective implementation of the Ecological Monitoring & Contingency Plan, consistent with the intent to engage with key stakeholders and respond to changes on the ground. The objective of monitoring is to identify where interventions should be made, acknowledging that ecological management is dynamic and is affected by many factors including climate and regional pressures on populations.

We have already initiated the following key actions. These were discussed on site with NCC's Principal Planning Officer, three NRW officers, WiseEnergy, NextEnergy Capital and relevant contractors and landowners on 1 May 2025:

- Coordinate with landowners to prevent any overgrazing by ceasing grazing entirely on the lapwing mitigation area during sensitive periods.
- Implement selective cutting within grassland areas containing solar panels to retain flowering field margins during summer months.
- Explore grazing exclusion of field margins during summer periods within grassland areas containing solar panels to encourage flowering species and to benefit invertebrate forage.

- Instruct additional third-party contractors to ensure that the cut and collection of the northern fields within the SCB mitigation area is completed prior to seeding in 2025 and agree on responsible parties for future years.
- Reseed SCB fields, where original seeding has not taken, this autumn.
- Perform strategic rewetting through scrape creation in the Lapwing Mitigation Area.

2. Shrill Carder Bee (SCB) Habitat and Wildflower Establishment

NRW and FoGL noted lack of flowering plants in SCB fields, inconsistent hay cutting, and overgrazing around key areas (eg bug hotels). NRW also highlighted herbicide use without SSSI consent and insufficient forage.

Shrill Carder Bee Mitigation Area

The Year 4 Ecological Monitoring Report notes that the Wildflower Seed Mix Area to the north-east of Array Area 2, which was harrowed and over-seeded in late summer 2021, had established well by 2023 with a species-rich sward containing six species of grasses and fifteen species of forbs. However, surveys conducted in 2024 reported signs of a decline in species diversity. While this is a setback, it is important to view this within the broader context of the multiple habitat management objectives for the area.

As detailed in Table 6 of the report, the SCB habitat serve several overlapping functions, including supporting pollinators, breeding birds, and maintaining overall species diversity. Of the eleven combined management objectives associated with this mitigation area, only one thematic area has been flagged as requiring further action, relating to sward diversity. This has been recognised and re-seeding has been scheduled to take place in autumn 2025. The other objectives have either been met or are progressing steadily, and the decline observed in this area does not reflect a systemic failure, but rather a localised issue now being actively addressed.

In 2023, there were no clear indicators that intervention was required, as botanical surveys showed promising establishment of the wildflower seed mix. However, a combination of factors in 2024, including unfavourable weather conditions and landowner-related constraints, meant that the planned hay cut and collection could not be completed. This may have had an impact on the floristic composition and structure of the sward this season. Recognising this, we have worked closely with NRW to agree on a remedial approach.

Following consultation with NRW's Ecologist, confirmation was provided on 15/05/25 that re-seeding would be an appropriate intervention. Subject to the results of the Year 5 botanical surveys scheduled for the week commencing 04/08/25, we intend to undertake

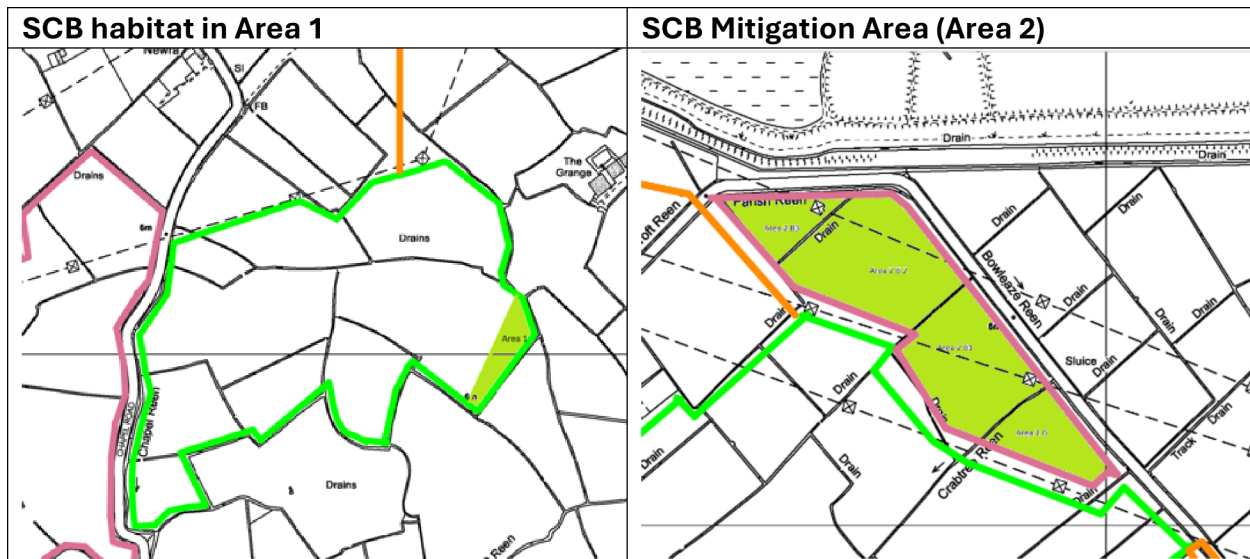
re-seeding of the area in September–October 2025, following the annual hay cut. This will include careful selection of species and consideration of soil nutrient levels, to improve establishment success and benefit the SCB population and wider pollinator assemblages.

It is also worth noting that even under optimal conditions, not all ecological interventions succeed on the first attempt. Habitat management shares many parallels with agricultural land use, where seeding failures are a recognised challenge due to variable weather, soil conditions, and land management logistics. What distinguishes our approach under the solar farm’s management, however, is the commitment to monitoring, intervention, and continuous improvement. Without the presence of the solar farm, it is unlikely that resources would have been directed toward the creation, let alone enhancement, of pollinator habitats in this location.

The SCB mitigation areas are being actively managed in accordance with the LEMP, and this case illustrates the advantages of a solar farm model that embeds adaptive ecological management. Where habitat delivery has not met expected outcomes, additional operational expenditure is being committed to remedy the issue, demonstrating our commitment to long-term, strategic investment in biodiversity on site. We are confident that the planned interventions will improve sward diversity and help to meet the intended ecological objectives in the coming years.

Soil Nutrient Status of SCB Habitats

Following a site visit with NRW on 24/06/24, a scope of work on adaptive management and reseedling commenced for a triangular field adjacent to Area 1. NRW recommended that the area be cut and collected, followed by re-seeding. They also requested soil nutrient testing, particularly for nitrate and phosphate levels, across the SCB fields in both Areas 1 and 2 (highlighted in green), to inform future management decisions.



We were very pleased to discuss and agree these actions, and subsequently followed up by obtaining, approving and commissioning soil testing quotations on 14/08/2024. Sampling was conducted later that month. The test results were shared with WiseEnergy on 16/09/2024 and forwarded to NRW on 19/09/2024.

NRW's grassland specialist reviewed the results and provided the following feedback:

- Phosphorus (P) levels are critical for successful wildflower establishment and need to be low.
- Area 1 returned a high P value (Index 3), while the remaining three samples indicated lower P levels more conducive to species-rich grassland creation.
- Magnesium levels were consistently high across all samples but are not considered a limiting factor.
- The high phosphorus in Area 1 is the most likely explanation for previous difficulties in establishing diverse swards there.

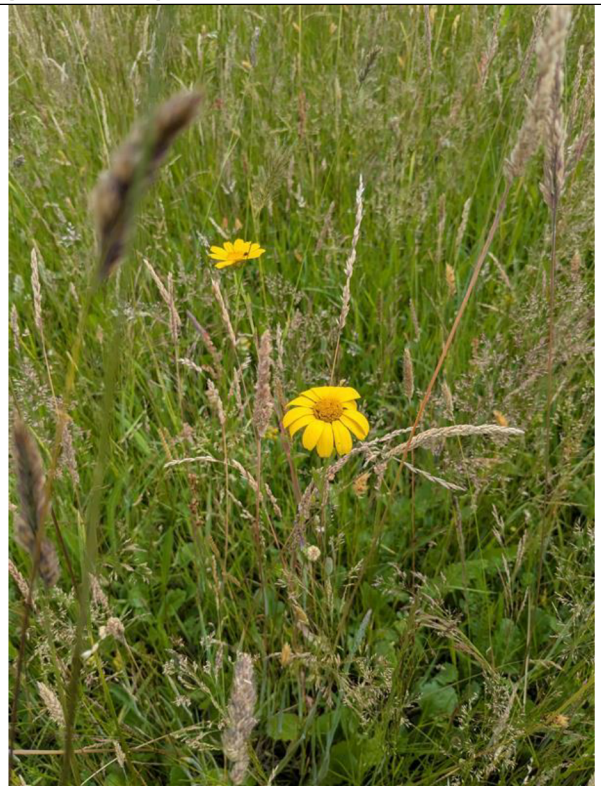
NRW had also requested that a decision be made regarding the reseedling mix, ideally the standard LEMP wildflower mix with the addition of yellow rattle, to help suppress grass vigour, but advised that if nutrient levels proved high, a cut-and-collect regime for 1–2 years followed by re-seeding might be more appropriate.

To ensure capture of the next viable seeding window, a decision regarding re-seeding needed to be made prior to the results of the soil sampling. Re-seeding therefore went ahead and was completed on the smaller of the two SCB mitigation areas on 22/10/2024 using the LEMP mix, which included yellow rattle.

Despite the elevated phosphorus levels in Area 1 – which are inherent to the site and outside the control of the project – preliminary indications from field observations suggest that wildflowers are establishing successfully, confirmed by NRW during the site visit in May 2025. A recent site walkover by Green Ecology on 25/07/2025 further confirmed encouraging signs of establishment, with improved species diversity observed in the seeded area. This was also reported by the landowners in June 2025 (see photographs).

In summary, all actions have been undertaken as intended and the area is successfully bedding in with wildflowers. We will continue to monitor progress and update management of the area as relevant.

SCB habitat in Area 1 – seed establishment (June 2025)





Soil survey results for the SCB fields in Area 2 were more favourable than those in Area 1, indicating a higher likelihood of successful wildflower establishment when reseeding takes place in 2025. However, to ensure optimal outcomes, soil conditions will be revalidated prior to seeding, and all plans will be developed in consultation with NRW.

Grazing and Shrill Carder Bee

It is important to clarify that no summer grazing has taken place within the SCB mitigation area, in full accordance with the commitments outlined in the LEMP.

However, grazing practices in adjacent operational areas, specifically those classified under the Key Management Area for “*Grassland Containing Solar Panels*”, have a management objective that is relevant to SCB. These areas are managed primarily to ensure grass heights are maintained at levels that prevent shading of panels and to minimise fire risk. The LEMP allows this to be achieved either through rotational low-intensity sheep grazing or mechanical mowing.

To provide additional value for pollinators such as SCB and other invertebrate species, the LEMP recommends that, where practicable, grazing in these areas be reduced or managed to allow field margins to flower and set seed throughout spring and summer. However, the LEMP does not prescribe a specific grazing density or rotational schedule, which means the approach must be adapted in light of both ecological and operational needs.

During Year 4 monitoring, it was observed that summer grazing levels in these operational areas may have limited the ability of field margins to support optimal flowering and forage availability for pollinators. In response, and as part of our commitment to balancing operational requirements with biodiversity goals, we will take proactive steps to enhance SCB-relevant habitat conditions. Management for Year 5 has been adapted by selective cutting of the grassland areas near the arrays while allowing the margins to grow and flower throughout the summer.

From Year 6 onwards, we intend to maintain grazing within and under the panel arrays to meet site management needs, but will trial the use of a line and reel electric fencing to exclude sheep from the field margins during the critical spring and summer period. This measure will allow wildflowers and other forage plants to establish and set seed through to late September, improving habitat quality for SCB while maintaining the integrity and function of the solar infrastructure.

We recognise that the current spatial compartments and management terminology may lack clarity. Following Year 5 monitoring, we intend to review and streamline the LEMP, its associated management areas and language to ensure the objectives and prescriptions remain clear, practical, and fit for purpose.

Herbicide Use

We continue to work closely and proactively with NRW to ensure all herbicide applications are fully compliant with the required SSSI consent processes and procedural safeguards. As confirmed during our recent site visits, we remain committed to maintaining open, transparent, and constructive engagement with NRW to ensure that both current and future applications strictly adhere to regulatory requirements.

In line with the LEMP, herbicide use on-site through targeted spot treatment may be used. We acknowledge that herbicide applied in 2023 was carried out under the assumption that SSSI consent had been granted, following confirmation of a herbicide consent from NRW's Environmental Assessment Officer on 15/05/23. The misunderstanding was unintentional and we have since appointed a new contractor to manage the site and introduced additional governance procedures and internal safeguards. This includes streamlining communication by reducing the number of points of contact across key stakeholders, and tightening oversight of contractor-led permitting and consenting processes through an internal compliance review step.

In agreement with NRW, we also implemented a compensatory action: a reseeded area adjacent to Area 1 with an appropriately agreed SCB seed mix. This site was visited with NRW in May 2025 and has established successfully, demonstrating strong species

diversity and a notable abundance of foodplants. This supplementary habitat helps mitigate any short-term reduction in forage availability for SCB caused by the herbicide application on thistles in the solar array areas.

Ecological monitoring remains essential for informing adaptive management. The most recent SCB survey took place in 2023, following herbicide application, suboptimal weather conditions¹, and amid nationally recorded declines². The next survey is planned for late 2025. It is important to note that even in 2023, the site continued to support a diverse and valuable terrestrial invertebrate assemblage, including two notable carder bumblebee species and other important pollinators such as the very scarce Long-horned Bee and Blunt-horned Nomad Bee, both indicative of flower-rich, legume-dominated grasslands.

Given the progress made to date and the targeted adaptive management measures now in place, we remain confident that the development will deliver continued net benefits for SCB and the broader ecological community over the short and medium term.

3. Lapwing Mitigation Area

RSPB and FoGL expressed concern about poor habitat condition, overgrazing by sheep, lack of water levels, and absence of predator exclusion fencing.

Population Trends

Lapwing have experienced severe population decline in the UK and Wales. In the early 1970s, the Welsh breeding population was estimated at approximately 15,000 pairs. By 2015–19, this figure had dropped to between 690–970 breeding pairs, with around one-third (265 pairs) now restricted to nature reserves.³ This context reinforces that wider population trends, driven by national-scale land use change, predation pressure, hydrological modification, and agricultural intensification, exert a significant influence on lapwing numbers beyond the scale of a single site. The presence or absence of lapwing in any given year is not, in isolation, a reliable measure of site-level management success. Breeding decisions by lapwing are influenced by a complex interplay of factors, including habitat structure, prey availability, disturbance, and landscape connectivity. Importantly, the only field within the development site known to have supported breeding Lapwing in 2017 was excluded from the final scheme layout. This means that the current management strategy is focused on creating and enhancing new habitat areas, rather than relying on

¹ https://www.wwf.org.uk/sites/default/files/2024-03/5126%20-%20FARMING%20IN%20WALES_REPORT_v3.pdf

² [Bugs Matter Citizen Science survey shows further decreases in insect numbers in Wales - Buglife latest news](#)

³ Pritchard, R., Hughes, J., Spence, I. M., Haycock, B. & Brenchley, A. (eds.) (2021). *The Birds of Wales* (Adar Cymru). Liverpool University Press, 586 pp. ISBN 978-1-800859-72-2.

previously established breeding sites. As such, we are actively addressing key potential limiting factors identified through monitoring, including water availability, sward structure, and predator pressure, to ensure that the mitigation and retained areas at Llanwern solar farm offer the best possible conditions to support and attract breeding lapwing in both the short and long term.

Ecological monitoring between 2015–2017 recorded 2-4 lapwing pairs within the site boundary and 8 pairs in adjacent fields. In 2024, surveys recorded a peak of 6 breeding pairs within the retained Lapwing Area and 2 further pairs, one with chicks, in nearby land. This is robust empirical evidence that the solar development has not had a detrimental impact on breeding lapwing using the landscape.

While only a single bird has been observed in the designated Lapwing Mitigation Area to date, this area still shows potential to attract breeding pairs with appropriate management interventions.

Grazing

The objection regarding grazing misrepresents both the intent and implementation of the LEMP. The management plan clearly permits grazing with sheep during the early breeding season, within specific stocking densities:

"From March 15th to May 30th, stocking density must not exceed one beast per hectare **or** five sheep per hectare. Mixed grazing is acceptable."

The implication that all grazing is non-compliant is therefore incorrect. The Year 4 report did note that the Lapwing Mitigation Area was overgrazed early in the season, resulting in a sward shorter than ideal. In response, and in agreement with NRW, we have introduced an adaptive management measure to exclude all grazing from this area between March and June moving forward, which has been followed on site this year. This precautionary step ensures the habitat is left undisturbed during the critical nesting period and removes any ambiguity regarding the counting of sheep and lambs.

Adaptive management

We acknowledge that persistently dry conditions within the Lapwing Mitigation Area (observed and discussed during the development of the project) have limited its suitability for breeding lapwing, particularly due to the absence of wet features essential for chick-rearing and invertebrate prey availability. Monitoring in recent years has highlighted the potential benefit of targeted hydrological enhancement, specifically the creation of shallow scrapes and selective rewetting, to improve habitat quality and functionality. The dry conditions on site reflect broader climatic trends, underscoring the need for renewable

energy developments including Llanwern solar farm to address the root causes of ecological stress.

In direct response to these findings, we are working closely with NRW and our ecological advisors to design and implement a series of scrapes aimed at increasing wet microhabitats across the mitigation area. These scrapes will improve foraging conditions for lapwing and other waders by elevating soil invertebrate availability, which is critical during the breeding season.

During an independent walkover by NRW, it was confirmed that some of the existing grips could be deepened by approximately 1 metre to help retain water, though such works would require additional consents to proceed. NRW raised no objections in principle to the creation of scrapes instead of grip deepening, and this option is now being actively progressed. Ground level measurements were collected by NRW at seven points across the site to inform the potential hydrological gain. For example, at Point 1, the current ground level is AOD 5.060 compared to a preferred Summer Penning Level (SPL) of AOD 4.150, meaning there is scope to raise local water levels by over 90 cm without exceeding permitted thresholds.

To take this forward:

- Our external ecologist visited the site on 25th July 2025 to identify optimal scrape locations, dimensions, and design parameters.
- A technical note will be produced to guide contractors, ensuring delivery is aligned with ecological requirements and site conditions.
- Subject to stakeholder and NRW review and any necessary consents, works are planned for Autumn 2025.

This approach reflects our commitment to evidence-led, adaptive management, identifying key ecological constraints through ongoing monitoring and acting swiftly with targeted, proportionate interventions. The planned scrape creation builds on advice from NRW and our ecologists, and should significantly enhance the site's capacity to support breeding lapwing in future seasons.

Predator fence

The potential installation of a predator fence is noted in the Lapwing Management Plan (Table 1), which states:

“**Possible inclusion** of a predator fence... to prevent predation by foxes.”

We remain open to this intervention and are committed to monitoring the need for such a measure through annual surveys. However, the design and installation of a predator fence must be carefully considered due to the intrusive infrastructure required and the sensitivity of the SSSI landscape.

The specification typically includes:

- A nine-strand electrified fence, 1.2m high
- ClipEx galvanised metal fence posts spaced at 6m intervals
- 2.4m strainers, with inter-beefy posts
- Underground cable works for power supply

This scale of infrastructure is not trivial and therefore, following consultation on this point during construction, the fence was not installed. Installation could affect the SSSI's landscape character, and would involve significant ground disturbance. For these reasons, and in accordance with best ecological practice, we will only proceed with fencing if:

- There is clear evidence of significant predation pressure.
- A formal recommendation is made by our third-party ecological advisors.
- Relevant SSSI consents are secured.

We are working closely with NRW and NCC on this decision and will continue to assess predation risk as part of our ongoing monitoring.

4. Bats

Baseline surveys conducted pre-construction identified several mature trees with low to moderate potential to support roosting bats, though no confirmed roosts were recorded. The site exhibited low to moderate levels of bat activity, primarily commuting and foraging, concentrated along existing linear features, particularly hedgerows and ditches. These habitat elements are of known ecological value for bats, functioning as commuting corridors and foraging routes. Notably, the solar development retained and buffered these features, in line with best practice to minimise disturbance to commuting routes and foraging habitat.

As stipulated in the LEMP, bat monitoring was undertaken in post-construction Years 1 and 3 using the same transects and fixed-position detectors as baseline surveys. This was implemented not in response to identified adverse impacts, but as a planned programme of evidence-led ecological assessment to ensure no deviation from expected outcomes.

Year 1 monitoring recorded a decrease in bat activity (measured as average passes per night) across most monitoring locations. Species diversity fell slightly from at least seven to at least five species, with no detections of *Nathusius' pipistrelle* or *Plecotus* spp., though this may reflect seasonal activity variation, equipment sensitivity, or natural inter-annual variation. Other locations recorded a 648% increase in bat activity, highlighting the highly localised and variable nature of bat responses across the site.

Year 3 monitoring reinforced this spatial variability. While a reduction in abundance (pass counts) was recorded within the solar array fields compared to control areas, the overall species richness remained consistent, suggesting bats continue to utilise the wider site. These changes may represent redistribution of activity (i.e. displacement or preferential foraging) rather than a net loss. Studies⁴ show that bat foraging patterns are sensitive to local prey availability, microclimate, vegetation structure, and even wind conditions, factors that naturally fluctuate over time.

Increases in bat activity in non-array areas suggest that these habitats may now offer improved foraging opportunities. Factors such as hedgerow removal carried out under NRW-approved reed management, aligned with the SSSI's conservation objectives, and other offsite habitat enhancements, including improved reed maintenance, may also have influenced these observations. Such redistribution is not necessarily negative; rather, it may reflect bats selecting more favourable foraging habitats resulting from the development's broader ecological enhancement commitments.

Regarding the Bristol University paper⁵, while their study of 19 solar PV sites in southwest England concluded that bat abundance was lower in array fields compared to controls, it found no consistent difference in species diversity. This aligns with our findings. However, we would caution against over-interpreting post-construction abundance data as a definitive measure of ecological impact. Static bat detectors only record presence and relative activity, which can be influenced by species detectability, weather conditions, site-specific management practices, and detector positioning. Potential displacement does not necessarily equate to exclusion or ecological harm, especially where high-quality compensatory habitat is managed in adjacent areas, as is the case at Llanwern.

⁴ Froidevaux, J.S.P., Zellweger, F., Bollmann, K., Jones, G., & Obrist, M.K. (2019). Landscape-level intensification of agriculture affects bat assemblage composition and diversity. *Nature Ecology & Evolution*, 3(7), 1005–1012.

⁵ Tinsley, E., Froidevaux, J. S. P., Zsebok, S., Szabadi, K. L., & Jones, G. (2023). Renewable energies and biodiversity: impact of ground-mounted solar photovoltaic sites on bat activity. *Journal of Applied Ecology*, 60(9), 1752–1762. <https://doi.org/10.1111/1365-2664.14474>

As stipulated in the LEMP, bat boxes were installed as part of habitat enhancement measures. These contribute roosting options for crevice-dwelling species and are intended to enhance the habitats for roosting capacity rather than mitigate for the loss of roosts. No further bat-specific mitigation or survey is required under the LEMP. However, we are committed to continued ecological stewardship and will consider additional monitoring in Year 10, as suggested in the Year 4 monitoring report, subject to consultation with our ecologists and relevant statutory bodies.

5. Crane

We recognise the ecological significance of the successful breeding of common crane in Wales in 2016, the first such event in over 400 years. This event is why there are provisions in the LEMP for Llanwern solar farm to ensure safeguarding and enhancement of crane habitats. However, the 2016 breeding event was exceptional. It marked a historical return of cranes to Wales after centuries of absence and cannot reasonably be treated as a new baseline or expected annual occurrence at or near the Llanwern site. This was a highly isolated event in an area that had not supported breeding cranes in living memory.

Indeed, it is well documented that cranes tend to return to previously successful breeding grounds, if conditions remain favourable, if there is pair fidelity, and if the birds survive overwintering. But a single event in 400 years, followed by no recurrence, is statistically and ecologically insufficient to imply that a breeding territory had been re-established at Llanwern prior to the site's development, or that the site had become critical crane habitat. Furthermore, there is no ecological evidence to suggest that cranes would not return to a site because of the presence of a solar farm, and in any case no nesting ever occurred on the Llanwern site itself - the 2016 nest siting was on private land nearby. At Llanwern itself:

- Cranes were observed adjacent to the site, including in fields to the north.
- The solar array footprint retains extensive open space, low-intensity grazing, and wetland habitat features compatible with foraging and potential future use by cranes. In addition Llanwern solar farm specifically features reed crossing points and other measures intended to facilitate crane movement around site should they return.
- Solar infrastructure is generally considered low-impact for wide-ranging species like cranes and also barn owls, particularly when sited in open agricultural landscapes with retained access and habitat connectivity.

In summary and based on the available evidence, it is impossible to attribute the absence of crane to the presence of the solar farm. As a responsible owner and operator we remain committed to managing the site in a way that maintains landscape connectivity and habitat suitability for a wide range of species, including large, disturbance-sensitive birds.

Should cranes return to the wider area, the Llanwern site remains capable of contributing to their habitat needs through dedicated Crane compensation areas, and importantly, does not present any known barrier to their return.

6. Reen Management

We were pleased to discuss the ditch management programme at Llanwern with NRW in April and May 2025. As outlined, the current ditch maintenance plan is based on an 8-year rotational cycle, covering approximately 1,650 metres of ditches per year. Under this plan, Year 1 commenced in 2024, with Year 2 ditches successfully cleared in February 2025. This revised schedule was formally shared with NRW on 23/01/25 and subsequently reviewed on 01/05/25, at which point NRW confirmed satisfaction with the progress and the quality of the works completed.

However, we note that the LEMP originally stipulated a 7-year ditch management rotation starting from the commencement of construction in 2020, which would imply completion of the first full cycle by 2027. In light of this, we recognise that our current 8-year rotation may diverge from the LEMP's intended timeline.

We remain open to adjusting the programme if required and welcome further engagement with NRW to determine whether a modification to the LEMP is appropriate or whether a revised management approach, such as increasing the number of ditches managed per year, is preferred to align with the original 7-year timeframe. We are committed to maintaining effective hydrological functionality across the site and will ensure the ditch management programme supports the wider ecological objectives of the SSSI.

7. Governance and Delivery Oversight

The LEMP was intentionally designed as a long-term, adaptive strategy that incorporates continuous monitoring, active engagement with stakeholders, and targeted intervention where necessary. This flexible, evidence-based approach allows for adaptive management in response to changing site conditions and ecological feedback, as is standard in conservation land management.

Specific grazing regimes are in place across the site, including between the solar panels within the Lapwing Mitigation Area and in the SCB area. This management approach is aligned with the approved LEMP and is regularly reviewed as part of annual monitoring and compliance checks. Oversight of grazing is the responsibility of the leaseholder, Gwent Farmers Community Solar Partnership Ltd, which retains full authority over land use decisions, including grazing permissions and contracts. Subletting or unauthorised third-party grazing is not permitted under the lease agreement.

Gwent Farmers Community Solar Partnership Ltd is supported by WiseEnergy, which manages the site in accordance with strict LEMP obligations. Decisions regarding grazing, habitat management, and operational oversight are taken in alignment with these obligations, and ecological contractors and third-party ecologists provide professional oversight through ongoing monitoring and day-to-day support. Annual ecological monitoring reports are submitted to NCC, providing a further layer of scrutiny and accountability.

We categorically confirm that no pesticides have been used on-site since the development of the solar farm. This contrasts with the surrounding agricultural land where pesticide use is likely to be widespread. The absence of pesticides is a key ecological benefit of solar farm management, supporting the recovery and resilience of pollinating insects and other invertebrate species. In the instance where herbicide was applied in 2023 on thistles, this was not pesticide use but a misapplication of spot herbicide that was permitted in the LEMP. This has since been rectified in full consultation with NRW, and additional governance checks have been introduced to prevent recurrence.

We strongly reject the assertion that collaboration with local landowners introduces risk. This characterisation overlooks the vital contribution they make to the effective delivery of the LEMP. Far from being a weakness, the involvement of experienced local landowners, who bring decades of land management knowledge, deep familiarity with site conditions, and a long-standing commitment to the Gwent Levels, is a strength of the project and to the Gwent Farmers Community Solar Partnership.

Their ability to apply practical, context-specific decisions has proven invaluable in tailoring ecological management in a way that is both responsive and effective. Dismissing this expertise fails to recognise the importance of working with those who understand the landscape at a level that no off-site manager could easily replicate.

This partnership model supports local employment, strengthens community stewardship of the land, and promotes sustainable agricultural practices across the Gwent Levels, objectives that should be welcomed rather than criticised.

Delivery of the scheme is ongoing, adaptive, and grounded in transparent governance, continuous oversight, and evidence-based management. Isolated incidents are addressed through corrective action, with full, transparent and open communication with NRW and other relevant parties, and do not indicate systemic failure. We remain committed to fulfilling all planning obligations and achieving the long-term biodiversity gains envisaged at project inception.

8. Summary of Actions Taken and Proposed for Year 5

MANAGEMENT AREA	RECENT ACTIONS TAKEN	PLANNED FOR YEAR 5+
SCB MITIGATION AREA (ADJACENT TO AREA 2)	• Soil nutrient testing (August 2024) • Results shared with NRW (September 2024) • Consultation with NRW specialists • Site visits and assessment by ecologist (1 May 2025 and 25 July 2025) • Landowners engaged for future seeding work	• Undertake hay cut and collect to reduce nutrient load • Soil testing to confirm suitability prior to seeding • Ground preparation and reseeding with enhanced SCB mix, including yellow rattle
LAPWING MITIGATION AREA	• NRW site visits and hydrological assessment (2025) • Ground level measurements and SPL analysis by NRW on 01/05/25 • Landowner engaged on grazing timing • Grazing exclusion enforced from 15 March–30 May annually	• Finalise and obtain necessary consent for scrape creation plan • Implement shallow scrape construction to improve wet foraging habitat • Continue monitoring of breeding birds and predator risk
DITCH MANAGEMENT	• Site walkover with NRW (May 2025) • 8 ditches cleared in line with Year 2 of the 8-year rotation • Ditch plan shared with NRW (January 2025) and reviewed (May 2025)	• Agree with NRW on schedule revision to align with LEMP's 7-year cycle • Increase the number of ditches cleared annually if necessary to meet management targets, while ensuring a mosaic of successional stages is maintained each year to

		support diverse macroinvertebrate communities
GRASSLAND WITH SOLAR ARRAYS	• Collaboration with landowners on adaptive grazing • Ecological input to align grazing with SCB habitat needs • Monitoring of grazing intensity • Selective mowing implemented in 2025 to promote diverse, flowering field margins and enhance pollinator habitat	• Establish grazing control measures to exclude high-value SCB field margins from sheep access • Continue to monitor sward height and species composition annually
HERBICIDING	• Following the 2023 herbicide application, immediate corrective actions were taken to mitigate unintended ecological effects and realign management with agreed conservation outcomes. Formal NRW herbicide and SSSI consents secured (July 2025) • SCB area in area 1 reseeded and showing good wildflower establishment, providing forage for SCB in 2025	• No further herbicide use without full NRW consent • Continue spot treatment only where essential (avoiding SCB foodplants) • Ongoing coordination with NRW and ecologists

Responsible solar development

In order to decarbonise its power grid, Great Britain and Wales require [45-47GW of operational solar](#) by 2030. This will come with many benefits: solar is clean, affordable, increases energy security, creates local economic opportunity, and addresses climate change. This is fundamental for the Gwent Levels: climate change is one of the single biggest drivers of nature loss, and there is a growing body of evidence that demonstrates the [nature-positive impact](#) well-developed solar projects such as Llanwern Solar Farm can have. Solar can and must play a significant role if Wales is to achieve its target of meeting 100% of its electricity needs from renewable sources by 2035, and it is in this context that Llanwern Solar Farm operates.

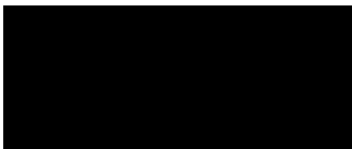
NextEnergy Capital recognises and seeks to maximise these benefits on all its projects. We are a responsible investor and take our obligations to local communities and the natural

environment seriously. We are proactively involved in [industry](#)⁶ and [academic](#) initiatives to drive the most transparent, sustainable industry possible, and are an early and voluntary adopter of the most robust international frameworks for nature currently in existence, including the [Taskforce on Nature-related Financial Disclosures](#). In support of this, in 2025 NextEnergy Group published a dedicated [Nature Strategy](#), one of the first in the entire electricity generating sector. The Nature Strategy provides extensive and specific information on the work we are undertaking to support nature – based on a technology and asset-specific impact assessment – and we are publicly committed to disclosing on progress against the Strategy, which will include the aggregated impacts of sites including Llanwern solar farm.

As part of its development, Llanwern Solar Farm was subject to extensive monitoring during construction and since. This included, for example, water quality monitoring throughout the construction phase, which was signed off by NRW on a quarterly basis and which did not identify any issues. No activity was permitted in the site's buffer zones during construction – not even turning vehicles at the end of each solar array – and to date the site has injected more than half a million pounds into landscape restoration and improvement measures targeted to support the ecology of the Levels. The regular dredging we perform, enabled by the funding from Llanwern Solar Farm, has directly contributed to the documented improvement in the reens and ditches that form the Levels, and we regularly discuss and adapt all measures with NRW and others, precisely in order to ensure they are most effectively targeted and delivered. Llanwern Solar Farm is providing direct operational support to the health of the Gwent Levels.

We also recognise our obligation to consult, communicate and engage, and we want relevant parties to be involved in the continuing success of nature on site. As such, and to ensure that the management of the site is as inclusive as possible, we intend to explore how best we can involve all relevant parties in its management. We will pursue action on this in due course.

Yours sincerely



Sulwen Vaughan
SPV Director

⁶ In particular including the Solar Energy Natural Capital Steering Group, which NEC has participated in since inception, including through one of its senior sustainability team members serving as the Group's inaugural Chair from 2023-2025.