



GREEN GEN CYMRU

Biodiversity Duty Plan (2026-2029)

February 2026

**POWERING
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ENERGY FUTURE
FOR WALES**

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1.0 Introduction

1.1 Setting the Scene

- 1.1.1 The nature crisis is increasingly making headlines due to the alarming rate of biodiversity decline, with growing recognition that biodiversity needs to be given equal priority and urgency as that given to climate change.
- 1.1.2 The Natural Resources Wales (NRW) State of Natural Resources Report 2025¹ highlights that Wales is now one of the most nature depleted countries in the world, with almost 1 out of 5 species at risk of extinction. Changes to the way land is managed for agriculture and the effects of climate change are having the biggest impact on wildlife. The numbers of terrestrial and freshwater species fell on average by 20% across Wales between 1994 – 2023².
- 1.1.3 There is an urgent need for action to reverse the national and global decline in biodiversity, and Green Generation Energy Networks Cymru ('Green GEN Cymru', or 'GGC') recognises we must be part of a collective movement to achieve the change needed. This plan sets out the actions (presented in **Table 2**, at the end of the plan) that GGC will take regarding biodiversity over the next three years, from adoption of this plan until the end of 2029.

1.2 Background

- 1.2.1 The Environment (Wales) Act 2016³ (the '**2016 Act**') has introduced an enhanced biodiversity and ecosystem resilience duty (the '**Section 6 Duty**') for all public authorities in Wales. The Section 6 Duty requires that public authorities must seek to:
"maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions."
- 1.2.2 GGC falls within the definition of a 'public authority' as we hold a licence under section 6(1) of the Electricity Act 1989 and are therefore subject to the Section 6 Duty.
- 1.2.3 This Biodiversity Duty Plan sets out how GGC would meet the Section 6 Duty for the period 2026 to 2029.

¹ https://cyfoethnaturiolcymru.gov.uk/media/f45ehjei/sonarr2025_final-version.pdf

² <https://stateofnature.org.uk/countries/wales/>

³ <https://www.legislation.gov.uk/anaw/2016/3/contents>



What is biodiversity?

Biodiversity, short for biological diversity, is the abundance and variety of all living things on Earth, ranging from bacteria to complex animals, plants, and fungi, along with the ecosystems they form

What is ecosystem resilience?

Ecosystem resilience is the capacity of an ecosystem — such as forests, rivers, or grasslands — to withstand pressures or demands (e.g. climate change), resist damage, and recover while maintaining its core structure, functions, and biodiversity

1.3 Who is Green GEN Cymru?

- 1.3.1 GGC is a business in the Windward Energy Group whose aim is to promote and develop new grid infrastructure to distribute green energy in Wales. Guided by our purpose, “Positive Energy for a Positive Future”, GGC is committed to building a resilient renewable energy network to help deliver clean, reliable energy to communities and businesses across Wales. This commitment supports the Welsh Government’s ambition to achieve 100% renewable electricity by 2035⁴.
- 1.3.2 GGC intends to develop, own and operate a 132kV independent distribution network to connect Welsh renewable energy generation to the existing grid network, and has been granted an Independent Distribution Network Operators (IDNO) licence to undertake our proposed projects.

What is an IDNO?

- 1.3.3 Operation of infrastructure at 132kV within Wales is classified as ‘electricity distribution’. These assets are in the main owned and operated by Distribution Network Operators (DNOs) for a particular geographic area. However, to increase competition in the electricity distribution market, Ofgem, as the UK energy regulator, now licences IDNOs that are not constrained to a particular geographic area. Once licenced by Ofgem, IDNOs can develop, operate and maintain electricity distribution networks. IDNOs connect their networks onwards into the local DNO’s distribution network or national electricity transmission network.
- 1.3.4 On 5 July 2024, GGC was granted a licence by Ofgem to become an IDNO, which allows us to develop, operate and maintain local electricity distribution networks anywhere in Great Britain.

⁴ <https://www.gov.wales/wales-aims-meet-100-its-electricity-needs-renewable-sources-2035>



What does an IDNO do?

1) Planning and Promotion of Grid Connection Projects

1.3.5 As an IDNO, GGC is actively involved in the planning and promotion of grid connection projects. Working with key stakeholders we:

- Assess customer connection requirements.
- Identify and appraise routeing options.
- Assess environmental effects through desk-based and field surveys.
- Engage and consult with landowners, local residents and other key stakeholders.
- Secure wayleaves, easements, and land rights.
- Obtain the planning permissions, infrastructure consents or development consents necessary to bring forward our grid connection projects.

2) Construction of Grid Connection Projects

1.3.6 If a grid connection project obtains the necessary permissions or consents, GGC will typically carry out the following construction related activities:

- Finalise detailed engineering designs and specifications.
- Procure equipment (overhead lines, cables, substations, switchgear and other infrastructure).
- Manage and oversee construction activities.
- Ensure compliance with industry standards, safety regulations and conditions of permissions or consents.
- Coordinate testing, commissioning and energisation of the network.

3) Operation and Maintenance of Grid Connection Projects

1.3.7 After energisation, GCC will assume long-term responsibility for the network, including:

- Day-to-day operation of the infrastructure.
- Planned and reactive maintenance and inspection of the infrastructure.
- Compliance with regulatory obligations.
- Ongoing coordination with the DNO and system operator for outages or network changes.

1.3.8 Currently, GGC is solely in the planning and consenting phase of our projects. We do not have any projects that are under construction or operation. GGC's current activities are principally limited to desk-based works, non-intrusive site surveys and a limited quantity of ground investigation surveys.

What does an IDNO not do?

1.3.9 IDNOs are regulated by Ofgem, but they do not regulate others. They do not set environmental policy and, whilst they must comply with environmental law and the conditions of planning and other consents, they have no decision-making authority over either.

1.3.10 IDNOs do not typically own or control large areas of land. Instead, they may hold:

- Substation compounds.
- Wayleaves or easements for overhead lines or underground cables.



- Access rights for inspection and maintenance of the infrastructure.

1.3.11 At the time of writing, GGC does not own any land or any interests in land associated with our proposed distribution network, nor do we have any built infrastructure but we will seek over the plan period to determine and then acquire the interests in land that are required to deliver and operate our infrastructure assets.

1.4 Green GEN Cymru's Policies and Procedures

1.4.1 Decision-making at all levels and all stages of a grid connection project (from planning and consenting to construction to operation and maintenance) can contribute to protecting and enhancing biodiversity and improving ecosystem resilience. Environmental considerations, including biodiversity, are a key factor throughout GGC's grid connection projects, alongside technical feasibility and economic viability factors. Some potential environmental effects can be avoided or minimised at the planning and consenting phase through careful routeing, while others are best mitigated through local deviations of the route, the refining of infrastructure locations and/or specific construction practices. Any potential effects will be identified and assessed, for example during the Environmental Impact Assessment process (where required, in line with The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017⁵), as part of the planning application, and opportunities for enhancement will be identified. This provides further context to the actions presented in **Table 2**.

Planning and Consenting Phase

1.4.2 It is generally accepted across the electricity industry that the guidelines known as 'The Holford Rules'⁶ should be employed as the basis for routeing high voltage overhead lines. These rules include the avoidance of major areas of highest amenity value when planning the general route (Rule 1) and the avoidance of smaller areas of high amenity value or scientific interest by deviation of the route (Rule 2).

1.4.3 GGC's 'Approach to Routeing Grid Infrastructure in Wales'⁷ document, which is informed by the Holford Rules, outlines our process for identifying and appraising route options, informed by desk-based studies and field surveys, and in consultation with stakeholders, as well as assessing environmental effects. It is designed to establish a consistent methodology for the routeing and environmental assessment of all our grid connection projects.

1.4.4 GGC has developed a series of policies and procedures associated with anticipated environmental surveys to inform the assessment of our proposed schemes, as set out in **Table 1**.

Table 1: GGC Policies and Procedures

GGC Policy	Purpose of the Policy
Survey Access Protocol	Sets out standards and procedures for GGC and our authorised contractors to follow before and during utilising powers of entry under s.172 of the Housing and Planning Act 2016 (the Act).

⁵ <https://www.legislation.gov.uk/wsi/2017/567/contents>

⁶ <https://www.nationalgrid.com/sites/default/files/documents/13795-The%20Holford%20Rules.pdf>

⁷ <https://greengentowyusk.com/documents/Approach%20to%20routeing%20Grid%20infrastructure%20in%20Wales.pdf>



GGC Policy	Purpose of the Policy
Protected Sites and Species Policy	Sets out the systems for GGC and our authorised contractors to follow to meet its statutory duties in relation to such protected sites and species when it and its contractors carry out surveys under the Wildlife and Countryside Act 1981 as well as other relevant legislation.
Vulnerable Person Protocol	Sets out the procedures adopted by GGC for identifying, engaging with, and supporting vulnerable individuals or groups impacted by GGC proposals. This protocol aligns with the Equality Act 2010.

Construction and Operation Phases

- 1.4.5 As acknowledged above, GGC is solely in the planning and consenting phase of our projects. Site specific detailed management plans required as part of the planning and consenting processes, for example Construction Environmental Management Plans (CEMPs), Operational Environmental Management Plans (OEMPs), and Habitat Management and Monitoring Plans (HMMPs), will be developed following industry best practice in due course and will include measures for the protection and enhancement of biodiversity through the planning and consenting process.

2. Legislative and Policy Context

- 2.0.1 This section sets out the main legislation and national policies relevant to the Section 6 Duty, providing a framework for delivery to improve biodiversity and ecosystem resilience across Wales.

2.1 Environment (Wales) Act 2016

- 2.1.1 This is the primary legislation of relevance to this plan as it puts in place the duty for public authorities to maintain and enhance biodiversity, promoting the resilience of ecosystems, in the proper exercise of their functions. Specifically, Section 6 of Part 1 of the 2016 Act forms the 'Biodiversity and resilience of ecosystems duty', otherwise referred to as the Section 6 Duty.

- 2.1.2 To discharge the Section 6 Duty, a public authority must have regard to the following:

- Section 6(2) – The **resilience of ecosystems**, in particular the following aspects:
 - a) diversity between and within ecosystems;
 - b) the connections between and within ecosystems;
 - c) the scale of ecosystems;
 - d) the condition of ecosystems (including their structure and functioning); and
 - e) the adaptability of ecosystems.

Many of the actions included in **Table 2** will promote aspects of ecosystems resilience, such as **Action 4**, which relates to exploring options at the design stage for improving diversity of ecosystems and connections between and within them.

- Section 6(4)(b) – Any guidance given by the Welsh Ministers (see **Section 4** of this plan).



- Section 6(5) –
 - a) The **list (of priority species and habitats)** published under Section 7 (see **Section 3.1** of this plan);
 - b) The **State of Natural Resources Report** published under Section 8 (see **Section 3.2** of this plan);
 - c) Any **Area Statement** published under Section 11 for an area that includes all or part of an area in relation to which the authority exercise functions (see **Section 3.3** of this plan); and
 - d) The **Sustainable Land Management Report** published under Section 6 of the Agriculture (Wales) Act 2023 (see **Section 3.4** of this plan).

2.2 Well-being of Future Generations (Wales) Act 2015

- 2.2.1 The **Well-being of Future Generations (Wales) Act 2015** was put in place to improve the social, economic, environment and cultural well-being of Wales. It lays out seven well-being goals, which public bodies, such as local authorities and NRW, must work towards achieving, and five sustainable development principles to adopt. Although it does not directly apply to GGC, its goals can influence the overall regulatory framework for energy within which GGC operates. One of the goals (titled 'A Resilient Wales') is to achieve *"a nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change)"*. Through implementing this plan, GGC will be contributing to the broader delivery of this goal.

2.3 Natural Resources Policy

- 2.3.1 The **Natural Resources Policy**⁸ sets the national strategic direction to turn the goal of sustainable management into action (i.e. to implement the Sustainable Management of Natural Resources (SMNR)). The Natural Resources Policy, which is produced by the Welsh Government and is formulated based on the State of Natural Resources Report (SoNaRR), provides a policy framework for how governmental policies can deliver both economic and environmental objectives, recognising that environmental issues should no longer be considered separately. It sets out the key challenges and opportunities in Wales in relation to the natural environment, identifying three national priorities ('Delivering nature-based solutions'; 'Increasing renewable energy and resource efficiency'; and 'Taking a place-based approach'). The Natural Resource Policy is implemented locally through 'Area Statements' produced by NRW (see **Section 3.3** of this plan), which directly address the priorities outlined in the Natural Resources Policy and which, where they relate to maintaining and enhancing biodiversity, have been considered within this plan.

3. Section 6(5) Considerations

3.0 a) List Published under Section 7

- 3.0.1 Section 7 of the 2016 Act sets the framework for the identification of species and habitats of principal importance in Wales, which are those considered by the Welsh Ministers to be of key significance to maintain and enhance biodiversity. It is the responsibility of the Welsh Ministers to publish the lists (which can primarily be

⁸ <https://www.gov.wales/sites/default/files/publications/2019-06/natural-resources-policy.pdf>



accessed through the Wales Biodiversity Partnership website⁹ and DataMapWales) and keep them under review, in consultation with NRW. The Section 6 Duty requires GGC to have regard to the Section 7 habitats and species, alongside the broader requirement for ecosystem resilience. Consideration of the Section 7 habitats and species is reflected in the actions in **Table 2**, for example **Actions 3** and **12**, which specifically call for consideration of Section 7 species and habitats when liaising with stakeholders regarding nature protection and enhancement, and when conducting early-stage ecological assessments.

3.1 b) State of Natural Resources Report

- 3.1.1 The SoNaRR, prepared and published by NRW, is an account of the status of biodiversity and an assessment of the sustainability of natural resources management in Wales. It provides an evidence base for the Welsh Ministers in the development and review of the Natural Resources Policy; for NRW in the preparation of Area Statements (see **Section 3.3** of this plan); and for local planning authorities when refreshing Local Development Plans. An interim report was published in 2024¹⁰, which was superseded by the full SoNaRR published on 18 December 2025 and updated on 28 January 2026¹¹. The report concludes that Wales is not yet meeting the long term aims set in the original 2016 report. While some indicators (such as pollinators) are stable, overall biodiversity remains low with ongoing concerns about soil, water quality, and tree health.
- 3.1.2 The SoNaRR directly evaluates progress towards the Sustainable Management of Natural Resources (SMNR), which is a goal established by the 2016 Act. Section 3 of the 2016 Act defines SMNR as using natural resources in a way and at a rate that maintains and enhances the resilience of ecosystems and the benefits they provide, and in doing so, meeting the needs of current generations without compromising the ability of future generations to meet their needs, and contributing to the achievement of the well-being goals set out in the Wellbeing of Future Generations (Wales) Act 2015.
- 3.1.3 The objective of the SMNR is to build resilient ecosystems which supply ecosystem services and help Wales meet its well-being goals for a sustainable future. The four long-term aims of the SMNR, along with how they relate to the actions in **Table 2**, are set out below.
- Aim 1. Stocks of natural resources are safeguarded and enhanced
- 3.1.4 Natural resources underpin our well-being and quality of life and are the basis of healthy, resilient ecosystems. They provide our food, clean air and water, fuel our industries, and create jobs.
- 3.1.5 The Aim 1 assessment evaluates Wales' progress towards safeguarding and enhancing stocks of natural resources. It takes a broad view of natural resources, including wild species, air, water and soil, and is not confined to economically valued stocks (which are mostly considered in the Aim 4 assessment).
- 3.1.6 All GGC projects seek to protect and enhance natural resources and ecosystems by building infrastructure in a nature-friendly way. Sensitive siting and design are



Ecosystem services =
the direct and indirect, tangible and intangible benefits that humans receive from healthy, functioning natural ecosystems

⁹ <https://www.biodiversitywales.org.uk/en/legislation-guidance/section-7/>

¹⁰ <https://naturalresources.wales/evidence-and-data/research-and-reports/sonarr2025-interim-report-2024-summary/?lang=en>

¹¹ <https://naturalresources.wales/evidence-and-data/research-and-reports/state-of-natural-resources-report-2025/?lang=en>



employed to avoid sites or areas that are designated as environmentally important as much as reasonably possible (see **Actions 13 and 14** in **Table 2**, which relate to planning routes in a way that protects species and safeguards and enhances habitats, having conducted appropriate ecological assessments). GGC works with stakeholders to seek to prevent damage to ecosystems, and where this cannot be avoided, to implement appropriate measures to compensate for any damage to habitats and to enhance the condition or extent of existing natural assets (see **Actions 3, 6 and 26** in **Table 2**, which cover liaison with relevant stakeholders in relation to biodiversity and protection and enhancement). GGC is committed to adopting sustainable practices to ensure their projects can coexist with the natural environment and improve the quantity and quality of natural resources in Wales, including ensuring that sustainable practices are adopted throughout our supply chain (see **Actions 11, 26 and 27** in **Table 2**, which all relate to how GGC can influence our supply chain in ways that promote nature recovery).

Aim 2. Ecosystems are resilient to expected and unforeseen change

- 3.1.7 Understanding and assessing ecosystem resilience is central to Wales' ability to respond to environmental pressures and deliver the SMNR. Building ecosystem resilience relies upon safeguarding and enhancing natural resources and ensures the continued provision of ecosystem services which Wales relies upon for its economy and health. Resilience means ecosystems are adaptable and can withstand the impacts of habitat change, climate change, pollution, Invasive Non-Native Species (INNS) and other pressures.
- 3.1.8 The Aim 2 assessment explores the ecological importance of semi-natural habitats, those most critical for resilient ecosystems. It also presents the Diversity, Extent, Condition and Connectivity (DECCA) framework used to assess resilience across ecosystems. Together, these elements provide the foundation for understanding how resilient Wales' ecosystems are to expected and unforeseen change.
- 3.1.9 To preserve and nurture the natural resources along our grid connection routes, GGC will create valuable habitats to support biodiversity, providing resilience and enhancing connectivity between ecosystems and populations (see **Action 4** in **Table 2**). Other more protective measures will be employed at GGC sites, in consultation with stakeholders, to prevent damage or fragmentation of habitats and support the health of existing ecosystems (see **Actions 2 and 3** in **Table 2**).
- 3.1.10 All GGC projects include detailed ecological surveys recording the natural and semi-natural habitats affected by our schemes (see **Action 12** in **Table 2**, which covers the need to undertake ecological assessments). Through careful routeing and detailed mitigation, habitats can be enhanced and ecosystem damage can be minimised (see various actions in **Table 2**, including **Actions 4, 13 and 14**). The resilience of ecosystems to climate change is considered within GGC's environmental assessments.

Aim 3. Wales has healthy places for people, protected from environmental risks

- 3.1.11 The environment provides regulating services which protect people from risks including air, water or noise pollution and flooding. Managing those services increases well-being resulting in the provision of a healthy environment for all. Meeting this aim is dependent on having resilient ecosystems and the health and well-being of the nation contributes to our ability to take advantage of the economic opportunities of a regenerative economy.
- 3.1.12 All GGC projects are designed to minimise their impacts on people by routeing and siting infrastructure that is sensitive to neighbouring communities and the way in which they use the buildings, open space, land and water around them. GGC's activities during construction and operation of their projects are well regulated through



multiple levels of governance, with attention to health and safety, nuisance and pollution prevention controls (e.g. noise management technologies), and implementation of best practice guidance (see **Actions 9 and 10 in Table 2**, which set out that measures to control nuisance and pollution will be included in management plans at the appropriate stage). This protects people from environmental risks and can also reduce the level of existing environmental risks, for example by delivering improvements to surface water drainage and water quality through planting and sustainable drainage systems (SuDS) (see **Action 17 in Table 2**, which sets out a 'nature-based solutions by default' ideology, including SuDS).

Aim 4. Contributing to a regenerative economy, achieving sustainable levels of production and consumption

- 3.1.13 Reducing the environmental impact of production and consumption and Wales' global environmental footprint involves transitioning from an economy that degrades natural resources to one that works with natural systems to restore nature. The aim is for Wales to use no more than its fair share of global resources and for the economy to operate within the regenerative capacity of the Earth's ecosystems.
- 3.1.14 GGC's projects are at the heart of delivering a resilient energy network that can provide a reliable supply of renewable energy across Wales for present and future generations. Through its grid connection projects, GGC is assisting Wales in meeting its net zero ambitions and using its natural resources sustainably. GGC also ensures that our use of natural resources is managed through carefully curated suppliers to reduce our operational impacts on local, regional and global resources (see **Actions 11, 26 and 27 in Table 2**).

3.2 c) Area Statements

- 3.2.1 NRW is responsible for the production of Area Statements¹² covering seven separate areas of Wales (South-East, South Central, South-West, Mid, North-East, North-West and Marine), which together provide a collaborative response to the Natural Resources Policy. Each Area Statement is split into key themes, within which are areas of focus, outlining the key challenges and opportunities specific to that locality. While GGC's IDNO licence does not contain a geographical restriction, our current activities pursuant to the licence are focussed within the regions covered by the Area Statements for Mid-Wales and South-West Wales. An overview of the biodiversity context and relevant areas of focus for these Area Statements, and how these have informed the actions **Table 2**, is provided below. We note that the Area Statements will be updated regularly and will therefore review them alongside this plan during the 3-year plan period.

Mid Wales Area Statement

About the Mid Wales Area

- 3.2.2 Mid Wales is a diverse area that includes a large proportion of the Bannau Brycheiniog (Brecon Beacons) National Park in the south, the Berwyn uplands in the north, and the Cambrian Mountains through the middle. The west consists of hills descending to Cardigan Bay, while farmland stretches to the east. The rivers of the Wye, Usk, Severn, Vyrnwy, Clywedog and Teifi and their associated tributaries flow through Mid Wales, and the high rainfall of the area provides rich water resources. Habitats include woodlands, semi-natural grassland, open water, wetlands and floodplains, mountains, moorland and heath, marine habitats, enclosed farmland and coastal margins.

¹² <https://naturalresources.wales/areastatements?lang=en>



- 3.2.3 Mid Wales is home to a variety of national and international designated sites, protected for their rare plants, animals, birds and geology. Examples include the Cors Fochno Special Area of Conservation (SAC) near Aberystwyth, an active raised peat bog, and the Montgomeryshire Canal SAC, which supports the largest population of the rare and protected Floating Water Plantain in Britain. Stanner Rocks, a Site of Special Scientific Interest (SSSI) on the Powys/Herefordshire border, is known for its rare plant life, including being the only site in the UK where the Radnor Lily is found, while there is a nationally important population of pearl bordered fritillary butterfly near Welshpool. Mid Wales is also home to a population of Red Kite.

Key Themes and Areas of Focus of the Area Statement

- 3.2.4 The key themes of the Mid Wales Area Statement are:
- Improving biodiversity;
 - Sustainable land, water and air;
 - Reconnecting people and places;
 - Forestry resources; and
 - Climate change.
- 3.2.5 Some of the main areas of focus within the above themes that may be relevant to GGC's functions in the context of the Section 6 Duty are the following, consideration of which has informed the actions set out in **Table 2**:
- Identifying opportunities for connectivity of designated sites (**Action 4**);
 - Tackling INNS, noting that Japanese knotweed and Himalayan balsam are widely spread in Mid Wales especially along the Rivers Wye, Usk, Rheidol and Teifi (GGC's currently proposed projects would cross the Rivers Wye and Usk), and that Rhododendron is also an issue in woodlands and protected sites (**Actions 9** and **15**, which set out that an INNS early detection/rapid response plan will be developed for all sites and that control of INNS will be included in appropriate management plans);
 - Taking measures to reduce pollution incidents, particularly considering the important water resources in this region (**Actions 9** and **10**); and
 - Awareness of the 'right tree, right place' principle in relation to tree planting (**Action 18**, which refers to this principle with regard to mitigation/enhancement planting).

South-West Wales Area Statement

About the South-West Wales Area

- 3.2.6 The landscape of South-West Wales consists of rugged uplands, farmland, estuaries, upland moorland, forests and coastland. The South-West is predominantly rural, with 56% of the land being made up of 'enclosed farmland' and a further 17% woodland¹³. The south coast of Gower in Swansea features rocky cliffs, headlands and sandy bays, whilst the north coast is noted for its broad estuarine saltmarshes. Within these landscapes there is a mosaic of habitats, such as enclosed farmland, marine habitats, mountains, moorland, heath, wetlands and semi-natural grassland. This region includes the Cambrian Mountains, the Pembrokeshire Coast National Park, and the Bannau Brycheiniog (Brecon Beacons) National Park, as well as Britain's first Area

¹³ <https://naturalresources.wales/about-us/what-we-do/strategies-plans-and-policies/area-statements/south-west-wales-area-statement/ensuring-sustainable-land-management/?lang=en>



of Outstanding Natural Beauty (now known as National Landscapes), the south coast of Gower.

Key themes and areas of focus of the Area Statement

3.2.7 The key themes of the South-West Wales Area Statement are:

- Reducing health inequalities;
- Ensuring sustainable land management;
- Reversing the decline of, and enhancing, biodiversity; and
- Cross-cutting theme: mitigating and adapting to a changing climate.

3.2.8 Some of the main areas of focus within the above themes that may be relevant to GGC's functions in the context of the Section 6 Duty are the following, consideration of which has informed the actions set out in **Table 2**:

- Understanding the importance and value of nature (various actions, for example **Actions 2, 12, 13 and 14**, which cover conducting ecological assessments, providing/maintaining suitable habitats for protected species where feasible, and planning routes to protect species and safeguard and enhance habitats);
- Enhancing species and habitat connectivity, noting the particular references within the Area Statement to river catchments (e.g. connectivity for freshwater mammals and for woodlands and grasslands within river valleys, with Teifi being one of ten designated 'Opportunity Catchments' in Wales¹⁴); grasslands (specifically the need to take a landscape scale approach to their restoration, for example in the Tywi valley); woodland habitats (especially since South West Wales has nationally important bat and dormouse populations); and the need to improve connectivity for amphibian species (for example in Carmarthenshire, where sections of GGC's proposed projects are located) (**Action 4**); and

3.3 d) Sustainable Land Management Report

3.3.1 The Agriculture (Wales) Act 2023¹⁵ establishes Sustainable Land Management as the core framework for agricultural support, with the overall aims of producing food sustainably, mitigating climate change, and enhancing ecosystem resilience. It should be noted that the first 5-year Sustainable Land Management report has not yet been published but is due in 2026. As this plan is reviewed over the 3-year period from its publication, relevant points from the Sustainable Land Management Report will be given due attention.

4. Guidance

4.0.1 The Welsh Ministers have published numerous guidance documents in respect of the Section 6 Duty. GGC must have regard to these documents when developing plans for (and the monitoring of) maintaining and enhancing biodiversity and improving ecosystem resilience. GGC will remain live to the fact that the guidance documents may be updated periodically.

¹⁴ <https://naturalresources.wales/about-us/what-we-do/strategies-plans-and-policies/area-statements/sector-specific-information/area-statements-and-opportunity-catchments/?lang=en>

¹⁵ <https://www.legislation.gov.uk/asc/2023/4/contents>



- 4.0.2 One piece of guidance from the Welsh Ministers¹⁶ provides a template to assist public authorities in producing a Section 6 plan and considering what actions they can take, which is structured around the Nature Recovery Action Plan (NRAP)¹⁷ Aims, and which has provided the framework for the development of the actions in **Table 2**. Delivery of this Biodiversity Duty Plan will therefore support delivery of the NRAP for Wales.

4.1 Nature Recovery Action Plan

- 4.1.1 The NRAP is a strategic framework produced by the Wales Biodiversity Strategy Board (WBSB) in partnership with the Welsh Government with the ambition “*To reverse the decline in biodiversity, for its intrinsic value, and to ensure lasting benefits to society*”, which would be achieved through the following aims:
- Aim 1: Protect, restore and effectively manage ecosystems to build their resilience;
 - Aim 2: Safeguard species and improve their management;
 - Aim 3: Tackle key pressures on species, habitats and ecosystems;
 - Aim 4: Establish effective governance and capacity to deliver;
 - Aim 5: Embed biodiversity through engagement and awareness raising to support effective decision making at every level; and
 - Aim 6: Improve our evidence and monitoring.

5. Actions

- 5.0.1 In accordance with the Welsh Government’s guidance on Section 6 Duty delivery and reporting, the actions in **Table 2**, which form the basis of this plan, have been framed in the context of the six NRAP Aims (see **Section 4.2** of this plan). Whilst each action has been allocated to the most relevant NRAP Aim, the vast majority will deliver against multiple aims.
- 5.0.2 These actions are for implementation throughout the duration of the 3-year plan period, with internal progress against each of the measures to be reported, as appropriate, each year. An indicative responsible party for each measure has been set out; however, this is intended as a guide and does not preclude other teams or departments from their implementation.

¹⁶ <https://www.gov.wales/sites/default/files/publications/2025-12/section-6-biodiversity-and-resilience-ecosystems-duty-planning-template-public-authorities-guidance.pdf>

¹⁷ <https://www.gov.wales/sites/default/files/publications/2020-10/nature-recovery-action-plan-wales-2020-2021.pdf>



Table 2: Biodiversity Duty Actions

Action no.	NRAP Aims	Actions	Lead team(s)	Support team(s)
1	Protect, restore and effectively manage ecosystems to build their resilience	Make documents available to relevant staff via the policies and procedures hub on GGC's intranet detailing how the mitigation hierarchy (also 'Step-wise Approach') can be applied to project design and routeing: avoid nature impacts (including connectivity), then minimise, then mitigate or restore, and finally offset or compensate for any residual effects to deliver a net benefit for biodiversity. [Planning Policy Wales, v12]	Engineering / HSE	
2		During the early stages, for each project and with reference to the appropriate Area Statement, plan for how the construction and operational phases will be carried out such that they contribute to protecting and restoring nature.	Engineering / HSE	
3		Consult and liaise with ecologists, local experts and communities at the appropriate stages during scheme development to support nature protection and enhancement at project planning, construction and operational stages, and to contribute to nature-based solutions in the design, particularly with reference to Section 7 habitat lists.	Engineering / HSE	
4		Explore options for integrating habitat creation into project design to create a focus on biological enhancement during and post project implementation including improving diversity of ecosystems and connections between and within ecosystems.	Environmental management	
5		Planning policy requires development to deliver a net benefit for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed) [PPW]. This will be considered at an appropriately early stage of project planning and routeing and will inform the planning and delivery of the construction and operational phases.	Environmental management	
6		Identify and engage with relevant stakeholders to explore the feasibility of working with local authorities to deliver biodiversity and NBB related co-benefits on non-GGC owned land.	Project management	External Comms



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7		Maintain a record of projects that GGC has contributed to that contribute to 'nature positive' goals as per the Global Biodiversity Framework, acknowledging that even at operational stage GGC will have control over very little land.	Project management	All
8		Keep an incident log for each project to ensure that lessons learned are recorded, and successful projects are flagged as case studies.	Project management	
9		Suitably manage potential sources of nuisance (e.g. light, noise, dust) and pollution (especially run-off into watercourses), and the spread of Invasive Non-Native Species (INNS) through implementation of best practice measures and relevant management plans during the construction phase of projects to avoid/minimise potential impacts on sensitive receptors.	HSE Dept	Engineering
10		Suitably manage potential sources of nuisance (e.g. light, noise, dust) and pollution during the operational phase of projects, such as water runoff from substations/switching stations.	HSE Dept	Engineering
11		Identify potential impacts in the supply chain, and seek to apply the mitigation hierarchy to biodiversity impacts as much as possible within GGC's level of influence.	Supply chain engagement	
12	Safeguard species and improve their management	Referring particularly to Section 7 species lists, conduct environmental screening and ecological assessments before and during the planning of projects.	Environmental management	All
13		Provide/maintain suitable habitats for protected species where feasible within GGC's level of influence, acknowledging that even at operational stage, GGC has minimal influence over how the land is managed as it will operate largely on easements.	Environmental management	Engineering / HSE
14		Where possible, plan routes that protect species, and safeguard and enhance their habitats	Environmental management	Engineering / HSE
15	Tackle key pressures on species, habitats and ecosystems	Develop and adopt an Invasive Non-Native Species (INNS) early detection/rapid response plan for all project sites	Environmental management	Engineering / HSE
16		Undertake a locational assessment of sites to understand where key pressures may be. This would involve investigating the site and an 'area of influence' for a reasonable distance beyond site boundaries,	Environmental management	Engineering / HSE



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		informed by expert ecological input, to understand and assess site-specific pressures on species, habitats and ecosystems and locationally appropriate measures to respond.		
17		Integrate a 'nature-based solutions by default' ideology into project planning and management processes. This can include leveraging things such as SuDS, swales/wetlands, native trees/grasslands as much as possible instead of grey infrastructure.	Environmental management	Engineering / HSE
18		Where tree planting is required for mitigation/enhancement purposes, engage with landowners and statutory consultees and, where achievable, seek to do adhere to the 'right tree, right place' principle.	Environmental management	Engineering / HSE
19		Periodically review document folders on GGC intranet to determine where additional biodiversity information can be shared centrally for project teams to use during all phases of project design and implementation. Updates to be made if document management processes are changed during the reporting cycle.	Project management	
20		Having carried out the actions specified and required in the: Survey Access Protocol; Protected Sites and Species Policy; and Vulnerable Person Protocol, review decisions taken to ensure compliance.	Executive Leadership Team	
21	Establish effective governance and capacity to deliver	Establish a biodiversity champion on GGC's sustainability committee to take ownership of communicating information on biodiversity best practice, as well as any relevant nature risk/opportunity considerations to project teams as needed.	Executive Leadership Team	
22		Provide company wide training on S6 obligations through webinars, lunch and learn sessions and business updates.	Internal comms	
23		Identify potential nature-related topics for company wide upskilling, the teams which may benefit most from this, and the most effective way to provide this training (in-person, webinars, email/online materials).	Executive Leadership Team	
24		Update corporate risk register to include biodiversity as a risk identifier/tag. Risks tagged to biodiversity will be reviewed on a	Environmental management	



Action no.	NRAP Aims	Actions	Lead team(s)	Support team(s)
		regular basis and escalated to relevant senior management as required.		
25	Embed biodiversity through engagement and awareness raising to support effective decision making at every level	Create an engagement plan determining which stakeholders can be engaged on nature recovery opportunities, what these opportunities could be, and which communication channels are best in carrying out this engagement.	External comms / stakeholder engagement	
26		Trial the introduction of biodiversity questions into supplier due diligence questionnaires with a trusted supplier to build out supply chain risk assessments related to nature.	Supply chain engagement	
27		Review contract clauses and procurement processes to embed biodiversity expectations.	Supply chain engagement	
28		Review existing corporate plans and policies to determine whether biodiversity is appropriately considered. Where gaps are noted, create an update plan showing how GGC intends to update policies over the current S6 reporting period to ensure appropriate considerations are reflected.	Environmental management	
29		Communicate nature positive achievements internally and externally to embed such practices into industry norms, and enhance reputation.	Internal and external comms	
30		Draft job description for a permanent environmental manager role to be added to the team during the 2026-2029 action plan cycle.	Executive Leadership Team	
31		Draft 'need to know' biodiversity guidance for project managers and land teams.	Environmental management	
32	Improve our evidence and monitoring	Establish monitoring for biodiversity outcomes and compliance and build these into HSEM audits and monthly reviews.	HSE Dept	Nominated trained internal auditors