

Maes Newydd  
Llandarcy  
Neath Port Talbot  
SA10 6JQ

**Ebost/Email:**

The Planning Inspector  
The Planning Inspectorate  
Crown Buildings  
Cathays Park  
Cardiff  
CF10 3NQ

**Dyddiad/Date:** 06 January 2021

Annwyl / Dear Sir/Madam

**Town and Country Planning Act 1990  
The Developments of National Significance (Wales) Regulations 2016**

**Shadow Habitats Regulation Assessment (HRA) review**

**Site Address: Land to the East of the A48 (Coordinates E257386, N209389) and Land to the South West of Tycroes (Coordinates E259219, N209551; & E259904, N209590), Carmarthenshire.**

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales (NRW) on the above shadow HRA, which we received on 16 December 2020.

We are not in agreement with the conclusion that a Likely Significant Effect, alone or in combination, on Caeau Mynydd Mawr SAC can be screened out.

The shadow HRA correctly states that the Caeau Mynydd Mawr Special Area of Conservation (SAC) has been selected for the Annex II species Marsh fritillary. The butterfly functions in a meta-population – a group of local (smaller) populations connected by migrating individuals. Any adverse effect on the local population of Marsh fritillary could have an impact on the SAC population.

We cannot conclude no impact from the cable route on marshy grassland habitat in area F8. We have concerns regarding the open cut method proposed in this area as there is potential for both the food plant Devil's-bit Scabious and Marsh fritillary butterflies to be present.

Whilst the shadow HRA identifies no Marsh Fritillary larvae, it does not consider the presence of the food plant and Marsh Fritillary itself. Therefore, based on the information submitted we cannot agree with the conclusion that a likely significant effect can be screened out.

I hope these comments are of assistance. If you require clarification, or further information in relation to this case, please do not hesitate to contact me at the above address.

Yn ddiffuant / Yours sincerely



**Cyfoeth  
Naturiol**  
Cymru  
**Natural  
Resources**  
Wales

**Miss Rhian Isaac**  
**Ymgynghorydd Cynllunio Datblygu / Development Planning Advisor**