

28/01/2025

Section 6 Duty Report: 2023-2025

Transport for Wales



TRAFNIDIAETH CYMRU
TRANSPORT FOR WALES



Llywodraeth Cymru
Welsh Government

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1 Introduction

1.1 Overview

Transport for Wales is changing the way Wales travels, making sustainable transport the first choice. We're building a multimodal integrated transport network called the T Network, making it easier for people to travel by train, bus, walking, wheeling and cycling.

We're committed to delivering a network with sustainability embedded throughout. As part of this we're working to maximise biodiversity and limit the impact we have on the natural environment.

1.2 Our operations

TfW has been appointed by the Welsh Government to run rail services in Wales. We're introducing new trains and electrifying tracks. With timetable improvements, we've increased train services across Wales and the borders.

Our ambition is that train travel becomes an everyday and affordable part of people's lives. We're supporting regions and local authorities to gain substantial funding for better rail transport in their area.

Buses are a lifeline for communities across Wales. We're helping provide a better and smoother service. We run multiple long-distance TrawsCymru bus contracts in Wales and have seen passenger growth. Working with local authorities, we've helped introduce Tap On, Tap Off ticketing and 1bws tickets.

We're helping people to make sustainable journeys. We've improved walking and cycling links to our stations. The new cycle trains on the Heart of Wales line mean we can facilitate more leisure journeys.

Our design hub was created to continue to raise the quality of active travel delivery in Wales. We provide toolkits that have been extensively used by local authorities, Welsh Government and Public Health Wales to help promote walking, wheeling and cycling.

We've also set up TfW Ffeibr, offering high-speed internet using the fibre cables laid during the electrification of railway lines in the South Wales valleys. This will provide faster connection for companies and communities.

1.3 Amey Infrastructure Wales

Amey Infrastructure Wales is working with us to deliver the Core Valley Lines Transformation Project; forming a major part of the South Wales Metro project to improve and renew existing assets across the region.

This development project (including the 25kV electrification of the route) enables more frequent services, increased capacity with more trains and a better customer experience. This will significantly improve connectivity throughout South Wales and provide access to jobs, education and leisure opportunities.

1.4 Biodiversity Action Plan

The TfW Biodiversity Action Plan sets out our key objectives and targets in relation to biodiversity:

- Protect and improve biodiversity and ecosystems
- Communication and Transparency
- Mainstreaming Best Practice
- Collaboration and Engagement
- Supporting Biodiversity Initiatives

The Biodiversity Action Plan (BAP) has been designed to be a living document; reviewed annually and updated as and when required (for example, for changes in legislation). The updated version (2026-2030) is currently being produced.

The BAP has been incorporated at an organisational level which demonstrates TfW's commitment and obligations under the Section 6 Duty of the Environment (Wales) Act 2016.

2 Key Legislation, Policy and Drivers

2.1 Environment (Wales) Act 2016 – Section 6 duty

As a public body, under Section 6 of the Environment (Wales) Act 2016 we have a duty to maintain and enhance biodiversity, promote the resilience of ecosystems and embed the consideration of these into our day-to-day activities, policies, plans, programmes and projects. At TfW, our reach for this is both on a local and landscape scale.

This report and our Biodiversity Action Plan collectively fulfil the requirement to report on our actions under the Section 6 duty by way of preparing and publishing a plan setting out what we propose to do to and providing key examples of how we are compliant with the Section 6 duty.

Under the Welsh Minister's Duty, TfW is required to report on our progress in line with Section 6 duty of the Environment (Wales) Act 2016.

2.2 Priority species and habitats

The Environment Wales Act replaced the Natural Environment and Rural Communities (NERC) Act Section 42 duty on the Welsh Minister to publish, review and revise lists of priority species and priority habitats in Wales which they consider are of key significance to sustain and improve biodiversity in relation to Wales.

Under Section 6 of the Environment Wales Act, public authorities must have due regard to:

- Priority Species and Habitats listed under Section 7
- Relevant Area Statements in areas where the public authority exercises its functions
- Natural Resources Wales State of Natural Resources report (SoNaRR2025).

2.3 The Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations (Wales) Act 2015 requires public bodies to consider the long-term impact of their decisions, work collaboratively with communities and partners, and take preventative action to address persistent challenges such as poverty, health inequalities, and climate change.

Transport for Wales (TfW) is a named body under the Act and we have published our own [Well-being Statement](#), which sets out how we'll contribute to the national well-being goals and embed the sustainable development principle into our decision

making. This reinforces our commitment to delivering transport solutions that support a prosperous, resilient, and healthier Wales.

Benefitting the environment, one of our core objectives is especially relevant to biodiversity and ecosystem resilience. We're committed to developing a transport network that supports biodiversity, improves air quality and increases resource efficiency. Our rail infrastructure plays a unique role in this effort, providing uninterrupted wildlife corridors across Wales and enabling low-carbon travel that can connect people to nature.

By integrating sustainable design principles, promoting electric and low-emission vehicles, and adopting circular economy practices, we're helping to preserve Wales' natural heritage. Rail also facilitates access to green spaces and leisure, contributing to healthier communities and improved well-being.

2.4 Policies, reports and statements

The Environment (Wales) Act 2016 draws upon three key drivers (produced by Natural Resources Wales) to focus on essential objectives to deliver a viable change to achieve Sustainable Management of Natural Resources in Wales:

2.4.1 Area statements

Seven Area Statements have been created, spanning Wales. Each outlines the key challenges facing that locality, what we can all do to meet those challenges and how we can better manage our natural resources for the benefit of future generations.

Taken together, the seven Area Statements can be seen as a collaborative response to what is known as the Natural Resources Policy, published by the Welsh Government in 2017, which sets out the key challenges and opportunities for the sustainable management of Wales' natural resources into the future.

Of particular relevance to TfW in relation to Section 6 duty are the South East Wales Area Statement and South-Central Area Statement; where we own the Core Valley Lines (outside of this; land is managed by Network Rail). As such we have full jurisdiction over important non-operational aspects such as land management and use in this area.

2.4.2 State of Natural Resources Report (SoNaRR)

The third State of Natural Resources Report (SoNaRR2025) aims to protect the environment for future generations and re-evaluate how we use our natural assets to address the dual threats from the climate and nature emergencies.

2.4.3 Natural Resources Policy

The key focus of the Natural Resources Policy is to improve the way we manage our natural resources. The policy sets out how Welsh Governments policies can deliver

both economic and environmental objectives and drive delivery across the Well-being of Future Generations Act Well-being Goals.

3 Supporting internal documents

Our Biodiversity Action Plan is supported by other strategies, plans and policies across the organisation. More detail is provided for each below.

The Sustainable Development team are currently collectively overhauling internal Sustainable Development policies, procedures and plans in line with the new corporate well-being objectives (see Section 3.10) which will be completed and shared with all directorates in 2026.

3.1 Climate Adaptation and Resilience Plan

Our Climate Adaptation and Resilience Plan was developed to provide the required strategic direction and governance for increasing the organisation's ability to effectively mitigate climate risks. The plan helps TfW to identify, capture and mitigate its climate risks across our assets, networks and operations, by committing to embed climate resilience into everything we do.

Through recognition of the intrinsic links between resilience and the nature crisis, our strategic climate resilience action plan is centred around the co-benefits that can be realised if adaptation is delivered effectively. Restoration of our natural spaces and biodiversity is critical to society's adaptation to climate change.

As such, we are working on inclusion of Nature-based Solutions (NbS) as a key component over hard engineering options, to maximise opportunities or working with nature to reduce TfW's exposure to climate risks. This includes working with natural ecosystem processes and materials for managing flood risk and other weather hazards such as heat and wind gusts.

Nature-based solution schemes will be evaluated in terms of their suitability on our assets and delivered collaboratively (with core stakeholders such as Natural Resources Wales) to ensure effective implementation. If hard engineering solutions are evaluated as the most appropriate, we will endeavour to ensure that such projects are executed sensitively to minimise any impacts on surrounding habitats and species.

3.2 Corporate Strategy

Our [Corporate Strategy \(2021-2026\)](#) commits to ensure our culture is one where sustainability and future generations are at the heart of decision making.

3.3 Environmental Management

Our Environmental Management System is certified to Level 5 of the Green Dragon Environmental Standard (equivalent to ISO14001) and references our biodiversity plans and standards, while aligning them with applicable environmental compliance

requirements. As part of the Green Dragon Environmental Standard, we're also required to maintain an environmental legal register and frequently evaluate our compliance against relevant legislation as part of this.

In addition, our Environmental Management Policy, Environmental Management System and Pollution Prevention Plans collectively contribute to the protection and enhancement of natural capital and biodiversity by:

- Setting robust standards for the sustainable development and asset management
- Improving land asset use and quality
- Minimising the likelihood and severity of environmental impacts
- Protecting against pollution
- Engaging with colleagues to raise awareness and understanding.

To ensure compliance with all regulatory and non-regulatory requirements, and to support the continual improvement of the Environmental Management System, we have developed an Environmental Compliance Audit Programme that covers all sites within the scope of our Environmental Management System.

3.3.1 Pollution Prevention Plans

Site-specific Pollution Prevention Plans are in place for all staffed stations with generic Pollution Prevention Plans in place for unstaffed stations (where risks are lower due to lack of operational activities on site). These Pollution Prevention Plans:

- Describe pollution risks and proposed measures to prevent pollution incidents
- Describe the proposed measures to mitigate and control any Environmental Impacts resulting from pollution incidents
- Are reviewed annually (or following a pollution incident) to ensure they remain appropriate and effective, and amended as necessary.

Having these plans in place helps mitigate pollution incidents and reduces the occurrence of dispersed pollution, which might otherwise impact local wildlife and habitats.

3.3.2 Environmental Incident Briefs

We actively monitor and manage environmental incidents across our operations, with a strong focus on protecting local biodiversity and ecological integrity. These incidents may include spills, fly-tipping, habitat disruption, and environmental nuisance. Each incident is recorded and investigated to determine the root cause and assess any potential impacts. Preventive measures are implemented where possible to reduce the likelihood of recurrence. This approach supports continuous

improvement in environmental stewardship and contributes to the resilience of local ecosystems.

3.4 Green Infrastructure Guidance

Our green infrastructure toolkit sets out a range of techniques and applications for our project teams. It seeks to provide a variety of approaches to:

- Improve air quality
- Manage surface water runoff
- Reduce urban heat island effects
- Improve biodiversity
- Promote economic development
- Enhance environmental and well-being benefits.

The toolkit is aimed at anyone who is considering enhancing green spaces at or around stations. It can be used by TfW employees including project managers, developers, planners, engineers and architects, Station Adopters and our contractors.

Measures include green roofs and walls, multifunctional wildlife planting, habitat boxes and Sustainable Urban Drainage Systems; SuDS. We encourage green infrastructure to be incorporated at the early design stages to maximise benefits.

3.5 Decision Making Toolkit

The Decision-Making Screening Tool is used as part of all Executive Leadership Team proposals. It is designed to ensure that decisions made within TfW comply with cross-cutting legislation and regulations, including any impacts on biodiversity and climate change. This tool is used to create a more detailed consideration of a decision and to identify if a full impact assessment is required.

When screening the decision, the author must consider the implications of implementing the decision or recommendation on the areas set out in a comprehensive accompanying table which includes legislation relating to the Environment (Wales) Act and Well Being of Future Generations Act.

The Screening Tool can be completed as a self-assessment or, should further support be needed, as part of a facilitated session.

3.6 Station Toolkit

Our Station Toolkit includes design sections on inclusion of planters, photovoltaic panels and is planned to include sections on green shelters.

3.7 Plan of Work

Sustainability and biodiversity requirements are included from Stage A for projects within our internal Plan of Work to ensure specialist advice and support in relation to biodiversity and sustainability is sought at project inception and design stages and provide project managers with relevant guidance to ensure opportunities are maximised and impacts avoided.

3.8 Well-being Objectives

Our four well-being objectives are designed to maximise our contribution to Wales' national well-being goals and uphold our commitment to future generations. Each objective aligns with the seven national goals and delivers broad, positive impacts across them.

Outlined in our well-being statement, these objectives guide our decisions to reflect the needs of people in Wales—now and in the future.

3.8.1 Objective 2: Benefiting the Environment

We'll develop a transport network that supports biodiversity, strengthens ecosystem resilience, improves air quality, and boosts resource efficiency. By working closely with communities, environmental agencies, and stakeholders, we'll design innovative solutions that reduce harmful emissions and help preserve Wales' natural heritage.

Our strategies will promote electric and low-carbon vehicles, establish green transport corridors, and embed sustainable design principles that protect local wildlife and ecological systems.

3.9 Governance

The original TfW BAP (2021-2026) was approved by our Executive Leadership Team and Board. The updated BAP (2026-2030) is currently being produced and will include review and engagement from our Executive Leadership Team before publication.

Our biodiversity and ecology commitments – including those in the BAP and under the Section 6 duty – are subject to a Monthly Risk Management Review by the Technical Lead for Ecology and Biodiversity, annually by the Head of Sustainability and Climate Change and as required by our Executive Leadership Team (for example for any new strategic risks) to ensure compliance.

4 **Highlights, key outcomes and issues**

A summary of our key actions, initiatives and outcomes is summarised in this section, using our BAP objectives as a reference framework.

4.1 Protect and improve biodiversity and ecosystems

We aim to deliver an overall improvement in biodiversity with proactive consideration of biodiversity and wider ecosystem benefits within a place-making context early in decisions and designs.

We're continuing to work on an extensive internal ecological assets database which will allow our staff to better understand where ecological opportunities and constraints are on our network. This includes identifying priority areas for climate adaptation measures such as nature-based solutions, commissioning lidar and aerial drone surveys to gather detailed information on habitats present, tree health and better identify and monitor ecological, management and operational risks such as ash dieback.

This wider ecosystem approach will help us to support, enhance and protect healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to changes such as from climate change.

As part of this objective, we're also working on mainstreaming long-term biodiverse habitat management for our land assets within the Core Valley Lines, covering over 220km of track.

This work will allow us to better understand our biodiversity gains, retention and losses on our land assets in addition to identifying more accurate mitigation and improvements and enable us to provide evidence and accountability of this more effectively under the Section 6 duty.

4.2 Communication and engagement

We work closely with our Communications, Branding, and Stakeholder teams to ensure that all messaging related to biodiversity is transparent, accurate and accessible to our employees, customers and the wider public. Clear communication is essential to help everyone understand the purpose, timing, and potential ecological impact of our activities.

This includes subject matter expert input and review of a wide range of communications, such as letters to residents about upcoming works, responses to freedom of information requests, community workshops, guidance for stakeholder

adopters and volunteers, website content, social media updates, and other external communications.

4.3 Stakeholder Collaboration

We are working closely with key bodies, stakeholders and organisations such as Welsh Government, Natural Resources Wales, our community partners, Invasive Non-Native Species Groups, Network Rail and local environmental groups such as the South East Wales River Trust.

This external collaboration and engagement allow us contribute to creating well-connected communities and make better, more informed decisions. For example, linking a project's biodiversity initiatives and funding with local nature conservation priorities and groups. TfW is a member of numerous local nature partnership groups to ensure our work is aligned and wherever possible, identifying potential opportunities for collaboration.

4.4 Community Rail

Our Community Rail and Sustainability teams engage with organisations and volunteers across the Wales & Borders network in the development and improvement of the railway natural environment.

Our Community Rail Partnerships help promote the railway at a local level while also working in partnership with Transport for Wales, Welsh and UK governments, Network Rail and local authorities to advocate for improvements to services and stations.

We undertake community outreach talks to local volunteer and community groups to provide advice, support and engagement on our work and biodiversity opportunities we are doing. Our Station Adoption scheme is also supporting biodiversity at stations with more than 250 volunteers helping to care for green features such as gardens and floral planters.

Through the above we can improve our understanding of the current and future needs of our communities, which will positively influence our work.

4.5 Mainstreaming best practice

We are committed to embedding best practice for biodiversity into our decision-making processes and day-to-day operations. Where appropriate, governance measures are in place and formally approved at board, departmental and project levels.

This approach includes providing targeted training for staff (such as land asset managers, engineers, and line-side teams) to help them identify ecological constraints and opportunities on the ground.

By doing so, we ensure that biodiversity considerations and ecosystem protection are integrated into the planning and delivery of our construction, maintenance, and asset management activities, all while maintaining strict health and safety standards.

Fundamental best practice principles for ecology and biodiversity are applied in line with this ecological mitigation hierarchy:

Avoid > Minimise > Mitigate > Offset

Ecological expertise and technical advice are available to all staff via the Ecology and Biodiversity team to support on how this may be recognised and implemented within each team. This includes general advice, assurance, project support, staff training, technical review and signposting for additional assistance as necessary.

Examples include:

- Reducing the amount of herbicide used during invasive species control and routine vegetation management on our network (see case studies section).
- Procurement – aligning our procurement questions within tenders – evidenced where applicable - to reflect the principles of the ecological mitigation hierarchy. Compliance is monitored and evaluated throughout the contract management process, in accordance with the updated Welsh Social Value TOMS (Themes, Outcomes, and Measures) framework.
- Sharing ecological data sharing with external stakeholders (including environmental record centres).
- Ensuring technical review and advice on external ecological reports align with current CIEEM best practice recommendations.
- Production of ecology e-learning modules for new starters.
- Ecological training provided to TfW staff on our responsibilities in relation to biodiversity legislation and best practice including face to face and online learning sessions, directorate working groups, team sessions and project manager meetings.
- Attendance at key working groups including Welsh Government, Natural Resources Wales and Local Nature Partnerships to ensure best practice and knowledge sharing.
- Ecology team staff annual attendance at workshops, conferences and training to ensure any developments in ecological best practice are identified and shared.
- Working closely with internal subject matter experts (including environment, climate change and energy) to identify opportunities for integrating best practice for wider ecosystem service delivery, using resources effectively.

This includes nature based solutions pollution prevention, carbon, water and flood management into internal processes and procedures.

- Working towards achieving Welsh Government 'Bee Friendly' status for individual TfW owned stations.
- Streamlining internal processes to allow better, more informed decisions for biodiversity (e.g. Plan of Work and Decision-Making Toolkit).
- Exploring innovative ecological solutions for transport related challenges such as remote ecological monitoring, lineside grazing management and alternatives to pesticide use for invasive nonnative species management.
- Ecological attendance at key internal meetings and groups including Infrastructure, Procurement and Operations.

By working closely with our staff and stakeholders to support change, we will create a culture shift where biodiversity is embraced on all levels and ensure our actions as an organisation positively contribute to global well-being.

4.6 Biodiversity initiatives

We have undertaken and are currently working on a variety of biodiversity initiatives, many of which include working closely with local community groups and are interlinked with active travel routes. A key part of this objective is actively seeking biodiversity opportunities and identify where we can do more beyond what is simply required.

This work contributes to creating attractive, viable, well-connected communities and maximises peoples physical and mental well-being and understanding of this.

Biodiversity initiatives include:

- Green infrastructure installed at Barry Depot (see case studies section)
- Green features installed at over 45 railway stations as part of TfW Community Rail
- Green roof waiting shelter prototypes and green wall installed on our head office roof for research and engagement (see case studies section)
- Green infrastructure including a green roof and SuDS to be installed at Caerphilly interchange (scheme development ongoing)
- Procurement of remote pollinator equipment (ongoing; to be installed on our network in 2026)
- Green roof shelter installed at Barry Island railway station
- Population monitoring and seed dispersal for Radyr hawkweed (see case studies section)

4.7 Challenges, barriers and constraints

Achieving our biodiversity objectives and meeting our Section 6 duty requires strong engagement, collaboration, and organisational commitment. A key challenge lies in balancing biodiversity needs with the operational demands of the railway, particularly in relation to health and safety. Managing this balance effectively is essential.

Many biodiversity initiatives require long-term planning, ongoing maintenance, and sustained funding. Planning and securing the necessary resources upfront is critical, as it can be difficult to obtain retrospective funding once budgets are committed and issues arise.

We remain committed to minimising our impact on biodiversity through proactive measures. These include ensuring future planting schemes are climate-resilient and ecologically appropriate, adopting informed and integrated vegetation management practices, reducing herbicide use, and embedding features like green infrastructure into design processes from the outset.

4.8 Case Studies

4.8.1 Llys Cadwyn

In 2023 a green roof waiting shelter prototype was installed on the TfW office roof at Llys Cadwyn, Pontypridd, with the aim of trialling the feature for potential installation more widely across our infrastructure (for example waiting shelters) as a biodiversity enhancement measure. Monitoring of the green roof has been undertaken by the TfW Sustainability Team through 2024 and 2025 to determine to success of the plants chosen and understand potential maintenance issues and improvements.

A green wall trial was also erected on the 4th floor balcony at the TfW Llys Cadwyn office in Pontypridd in 2023; with the added benefit of offering increased staff wellbeing. This system is trialling species within a manually irrigated system, which requires weekly maintenance (watering and pruning) and potential plant replacement, particularly during the summer months. As above, monitoring is ongoing to determine the success of such features, most suitable plants and maintenance strategies.

Both systems were installed by the Green Infrastructure Consultancy.

4.8.2 Barry Island station

A sedum roof shelter was installed at Barry Island station in 2024 to improve biodiversity and provide a green 'stepping stone' for wildlife. This specification was chosen as an alternative to a wildflower green roof due to the proximity of such features to Overhead Line Electrification (OLE); they would be a lower maintenance system that could potentially be retrofitted onto other shelters.

The roof has been monitored through 2024/25 to establish the success and maintenance requirements of a sedum roof in station locations such as this, for potential further roll out.

4.8.3 Radyr hawkweed

Radyr hawkweed is present at two locations at TfW owned station Danescourt Station and Radyr. An extremely rare endemic plant, previous population estimates of this plant originally approximated only 30 in the UK.

Actions undertaken to safeguard and encourage the extent of the plant include the erection of signage at Danescourt station to inform staff and contractors of its presence during project works at the station. This included an Environmental Bulletin via our Infrastructure Delivery Partner (Amey Infrastructure Wales) on its location and restrictions, targeted seed collection and redistribution in the local vicinity, bespoke long-term management, prohibition of pesticide use in these areas and collaboration with Natural Resources Wales on the above.

Annual monitoring visits have been undertaken by TfW Ecologists to monitor the plants population and extent, with notable increases in individual plant numbers since seed collection between 2022 and 2025.

4.8.4 Barry Depot

TfW's first Sustainability Exemplar project was implemented at Barry Depot in 2025 and included the installation of off-grid solar and wind powered lighting, reused barriers, benches made by our community partner Cambrian Village Trust, a bog garden made by a member of the team and reused tables and benches donated by Goodsheds. The TfW Sustainable Development and Climate Change team are also running a solar powered shelter trial at the site in 2025.

An accessible wellbeing garden was created; including raised beds made from sleepers recovered on site, four nature beds with wildlife friendly planting, insect hotels and bird boxes, three food beds and water butt. The depot achieved the level 5 Green Dragon Environmental Standard last year. The success of the project has potential to lead to similar initiatives and projects being undertaken at other suitable depot sites to increase biodiversity and renewable energy use across our network.

4.8.5 South East Wales River Trust

Numerous watercourses and culverts are within TfW's land boundary, some of which were identified as posing barriers for fish migration for example due to lack of resting places and steep slopes. Fish migration improvement works have been confirmed with surveys underway, installation is planned in winter 2026 to improve the Nant Hir culvert in Hirwaun for fish migration. This includes installation of culvert baffles and a floating ramp.

4.8.6 Amey Infrastructure Wales and Craidd Alliance

This section includes work undertaken collectively by both the Craidd Alliance (a partnership formed by Transport for Wales, Balfour Beatty, Siemens Mobility, Alun Griffiths Contractors Ltd and Amey Infrastructure Wales) before being disbanded in December 2024 as this is within the reporting period.

4.8.6.1 Pentrebach culvert (2023)

Pentrebach culvert and its surrounding embankment, located in Merthyr Tydfil, was identified for biodiversity improvements embankment using a Gravitas Flex Vegetated Wall Solution. Amey Infrastructure Wales worked with the designer (Amey consultant) and Transport for Wales to implement a beneficial vegetated wall solution using 50% recycled material for the wall construction which is 100% recyclable with bags a mixture of sand & compost, promoting biodiversity growth. The Gravitas Flex vegetated wall stabilised the embankment and reduces greenhouse gas emissions during construction - emitting 97% less greenhouse gases than concrete and 98.5% less than steel in manufacturing. This innovative solution promotes environmental sustainability and cost efficiency

4.8.6.2 Restoration, Protection and Enhancement of Ely Valley Site of Special Scientific Interest (2024)

As part of a project (Restoration, Protection and Enhancement of Ely Valley Site of Special Scientific Interest), South East Wales River Trust staff and volunteers have been tackling invasive non-native cherry laurel along the Ely River. The volunteers have worked tirelessly cutting down large areas of laurel where it's taken hold of woodland areas on the Ely Trail. Cutting by hand the team have now cleared around approximately 500 square metres, with the volunteers made up of local people along with groups of staff from Welsh Government and Balfour Beatty. The North, Wales & Central shadow leadership board, along with staff from across the Core Valleys Line project and our subcontractor Mikerry collected 15 bags of litter and fly-tipped household items. The team also worked hard to remove approximately 100m² of invasive cherry laurel. Planned next steps are to treat the laurel stumps and plant trees with volunteers. The teams will continue to look for opportunities to support the tree planting and hope to return in March 2026 with the Rail Systems Senior Leadership Team to support South East Wales River Trust undertake a world record clean-up of the rivers. Total volunteering hours: 60.

4.8.6.3 Core Valley Lines - Invasive species

Currently our Infrastructure Delivery Partner Amey Infrastructure Wales manages 315,452m² of Himalayan balsam and 233,125m² of Japanese knotweed across the Core Valley Lines. Collectively, a total of 548,577m² of invasive non-native species (INNS) visited or treated during 2022-25 including Cotoneaster, Japanese knotweed, Himalayan balsam, Bamboo, Montbretia and Rhododendron.

When our sub-contractor teams go out on site to treat INNS, they report back any new areas found or if the sites have increased/decreased in size based on last year's figures. This is then inputted into a master spreadsheet and onto our GIS system to graphically display the information.

Herbicide spraying is the main method of INNS treatment, but wherever possible Himalayan balsam is hand pulled/stripped/brush cut including when it's raining. A total of 95,639m² of INNS have been hand pulled to date, saving approximately 50 litres of herbicide being used.

The invasive non-native species treatment is effective; with the average regrowth of Himalayan balsam in 2025 was 44%. The average regrowth of Japanese knotweed found was 20%.

A novel treatment method will be used to perform a trial 'pilot study' of horsetail control during 2026. In addition, we are investigating other INNS treatment options including steam treatment and biological control.

4.8.7 Brecon Town Centre

TfW's Design Office is supporting Powys Council to reimagine the streets in the centre of Brecon as both a nature rich and walking and cycling friendly environment. As part of this we are working on inclusion of a series of biodiverse rain gardens and currently researching an innovative cement free and low carbon block paving product and have also proposed re-purposing wood from a Welsh viaduct to form street benches in the town-centre.

5 Action report

This section provides a summary in relation to each NRAP objective. Supporting information can be found in the previous sections of this report.

5.1 **Objective 1: Engage and support participation and understanding to embed biodiversity throughout decision making at all levels**

5.1.1 **Biodiversity incorporation**

The following corporate plans, policies and documents have been published which incorporate sustainability and biodiversity as standard:

- Biodiversity Action Plan
- Wellbeing Objectives
- Five Year Corporate Plan
- Climate Adaptation and Resilience Plan
- Green Infrastructure Guidance
- Decision Screening Tool
- Procurement policy
- Environmental Management System - Green Dragon
- Birds Management Procedure
- Plan of Work

The above is collectively underpinned by the principles of the Well-being of Future Generations Act to ensure decisions and objectives are made for long term and align with the well-being goals.

5.1.2 **Funding**

Internal budgets allocated annually specifically for biodiversity until April 2025 are:

- General biodiversity Initiatives - £5,000 (2025) and £30,000 (2026) - Planned works utilising these budgets include procurement of remote pollinator monitoring equipment and third-party habitat management.
- Green Infrastructure (Llys Cadwyn) - £500.

- Nature in the Community - £5,000 annually – sponsorship of this category of the Tidy Wales awards run by Keep Wales Tidy. This work helps to identify relevant groups to work with in related nature projects.

5.1.3 Training, engagement and awareness

Training, engagement and awareness raising internally is ongoing, including:

- Mandatory sustainability and biodiversity e-modules are now in place for all new starters
- Ecology face to face and online sessions provided to all employees
- Bespoke project team support including ecology requirements and opportunities
- Rail Infrastructure workshops
- Ecology sessions provided in the TfW Innovation Group
- All Company intranet posts

5.2 **Objective 2: Safeguard species and habitats of principal importance and improve their management**

As part of best practice and to ensure legal compliance, where applicable all activities across our operations—including infrastructure maintenance, vegetation management, and new construction—are subject to Preliminary Ecological Appraisals, protected species surveys, and ecological scoping surveys as required. These assessments help us identify any potential impacts on protected and priority species and habitats.

Any biodiversity initiatives, developed in line with our wider BAP objectives, are guided by the presence of priority species and habitats identified during the evaluation process. This includes undertaking site-specific desk studies to identify opportunities to enhance habitats or implement initiatives (for example, selection of plant species or habitat management practices) that support local priority species.

Our Core Valley Lines ecological assets database, when completed, will contain measures to protect priority species and habitats on our land assets as standard (including bespoke land management per route section) as well as prioritising creating and protecting resilient ecosystems by establishing habitat complexity and longevity.

This database will identify biodiversity opportunities across our network which will be informed by ecological data for protected species, sites, habitats, invasion nonnative species and connectivity opportunities (including for example data from National Resources Wales' Environmental Information Portal and Buglife's B-lines).

5.2.1 **Core Valley Lines**

We've electrified the rail network in the South East Wales Valleys. Vegetation near the railway can be a hazard to our employee and customer health and safety.

Vegetation management along the Core Valley Lines is an essential part of electrification. It will also make the railway safer, more reliable and more adaptable to future climate change challenges. Historical shortfalls of line maintenance mean we're seeing big changes on our railway currently; including more vegetation being removed than has been for many years.

Ecological surveys are undertaken prior to works so that we can understand any ecological impacts and requirements.

We take a comprehensive approach to protecting wildlife during and after our works. This includes, where necessary, obtaining licences from Natural Resources Wales to operate in areas with protected species, carrying out ecological pre-checks and on-site supervision (such as monitoring for nesting birds), and implementing strict biosecurity measures to prevent the spread of invasive species. We also deliver

long-term mitigation for species like bats by creating and enhancing habitats that are managed under ongoing conservation plans.

We undertake a monthly meeting with our infrastructure delivery partner, Amey Infrastructure Wales, which includes ecology-related works, risks and incidents. Any risks identified requiring further action are reviewed for corrective action including internal audits to improve processes, works plans and procedures.

We are in the process of implementing a Vegetation Management Plan for the Core Valley Lines as part of our Climate Change Adaptation and Resilience Plan. The Vegetation Management Plan seeks to balance the operational safety and weather resilience of our railway assets. We are carrying out key track-side vegetation management to reduce physical and visible obstructions on the tracks, ensuring our trains run safely and that disruption to our services is minimised. Increasing the resilience of our assets to extreme weather is also a core part of the Vegetation Management Plan. Effective management of dense vegetation and overgrown trees can reduce the risk of wind-blown trees, debris and fallen leaves on the track, ensuring the safe running of the railway and reduced train delays.

We are maintaining and protecting existing priority habitats as well as considering opportunities for strategic species-specific tree planting to increase asset resilience (such as earthworks and track). The resilience benefits include provision of shade in hot temperatures, cover against wind gusts and slowing down water run-off from rainfall to reduce flood risk. This is balanced with essential track-side vegetation to maintain safety.

As part of our Climate Change Risk Assessment process, we will review any new planting in relation to climate change risks and opportunities. This includes prioritising adaptable species with increased tolerance to extreme winds and temperature variations throughout trackside locations. Nature based solutions and natural flood management schemes are being investigated for their potential to reduce flood risk and other weather impacts on our network. Further information on this is included in our Climate Adaptation and Resilience Plan.

All statutory, non-statutory and locally designated sites are included as part of ecological surveys undertaken as standard prior to any works which may affect protected sites and species.

5.2.2 Waltwood

TfW currently manages three sites of importance for nature conservation; located at Waltwood near Bishton, Newport:

- Craig-Y-Perthi Field North is designated for its semi-improved calcareous grasslands within larger improved grassland field.
- Craig-Y-Perthi Field South is designated for its semi-improved calcareous grasslands within larger improved grassland field.

- Craig-Y-Perthi Wood is designated for Ancient semi-natural woodland with large population of goldilocks buttercup and early purple orchids.

All three in the same vicinity and are subject to targeted management to retain and protect these qualifying features including annual monitoring, sheep grazing and woodland management.

5.3 Objective 3: Increase the resilience of our natural environment by restoring degraded habitats and habitat creation

In line with our 'Supporting Biodiversity Initiatives' BAP objective, we have introduced a variety of green features and spaces at more than 80 railway stations since 2019, with further developments planned. Wherever possible, these enhancements include pollinator-friendly planting to support local biodiversity.

We continue to work closely with station managers and station adopter groups to enhance habitats at local stations. Together, and in alignment with relevant Area Statements, these initiatives play a vital role in connecting people with nature by creating green 'stepping-stones' across our network in areas that previously lacked natural spaces. This helps to reduce habitat fragmentation and strengthen local ecosystem resilience.

We also collaborate with Natural Resources Wales to build meaningful partnerships that support the biodiversity objectives outlined in the South East and South Central Area Statements.

Once completed, the Core Valley Lines biodiversity assets database will inform long-term measures, guidance, opportunities and recommendations on suitable habitat creation, enhancement and management based on each route. This will include working with adjacent landowners to identify opportunities for joined up management and landscape scale improvements.

5.4 Objective 4: Tackle key pressures on habitats and species

5.4.1 Key pressures

We have undertaken comprehensive invasive nonnative species surveys since establishing ownership of Core Valley Lines in 2020 to fully identify risks and management opportunities within the TfW ownership boundary.

As part of this, 268,912m² of Himalayan balsam and 226,885m² of Japanese knotweed are now under long term management plans which we are treating using either herbicide spraying, hand pulling, brush-cutting or strimming.

In addition to treatment, we implement strict biosecurity protocols when working in any areas of invasive species. Project Advice Notes are issued to employees as applicable relating to invasion nonnative species management and requirements.

To reduce risks to biodiversity, human health and non-target species, we are working hard to reduce and where possible eliminate use of herbicides on our land assets; whether this relates to management of invasive species or as part of routine vegetation management.

This involves working closely with our Infrastructure Delivery Partners, station adopter groups, station managers and contractors to determine where we can undertake alternative management (such as hand pulling and mechanical removal) instead of herbicides (see case studies section for station example).

All areas for INNS treatment undergo a treatment evaluation process to determine whether these can be treated by hand pulling, brush-cutting or strimming as opposed to herbicide spraying. Though it is not always possible to use physical or mechanical methods, alternative methods such as hand pulling Himalayan balsam to reduce herbicide use are evaluated for each treatment area. The total figure for hand pulling, brush cutting or strimming this year during the first round of treatment of 2022 was 30,712 m²; reducing the need for over 600 litres of herbicide.

We are constantly exploring opportunities to utilise alternative treatment methods as opposed to herbicide and working to identify potential suitable trial sites for these.

5.4.2 Climate change and resilience

TfW contributes to Wales' goal of decarbonising our network through measures such as electrification of Core Valley Lines network, using Nature Based Solutions and working to removing contamination at all Core Valley Lines stations. Our approach is outlined in our Low Carbon Impact Strategy.

TfW's Climate Adaptation and Resilience Plan helps us to ensure that TfW fully identifies, captures, and mitigates its climate risks across our networks and operations, by committing to embed climate resilience into everything we do.

Through recognition of the intrinsic links between resilience and the nature crisis, our strategic climate resilience action plan is centred around the co-benefits that can be realised if adaptation is delivered effectively. Restoration of our natural spaces and biodiversity is critical to society's adaptation to climate change.

As such, we'll consider nature-based solutions over hard engineering options, to maximise opportunities or working with nature to reduce TfW's exposure to climate risks. If hard engineering solutions are evaluated as the most appropriate, we will endeavour to ensure that such projects are executed sensitively to minimise any impacts on surrounding habitats and species.

5.4.3 Green Infrastructure

Green infrastructure is encouraged for inclusion at the early design stage in to maximise benefits. Our Green Infrastructure Toolkit includes green roofs and walls, multifunctional wildlife planting, habitat boxes and SuDS. Green infrastructure proposals including a green roof and SuDS are included in the development of Caerphilly interchange.

5.5 Objective 5: Improve our evidence, understanding and monitoring

5.5.1 Data collation and sharing

We follow best practice guidance and legislation in relation to data collation and sharing. Ecological opportunities, risks and any mitigation or licences required as a result of our work is informed by securing relevant species and habitat data (including Section 7) from relevant environmental records centres as required. Any potential impacts upon Section 7 species and habitats are subject to an ecological mitigation hierarchy to avoid this, only reducing or mitigating where this is unavoidable.

We share our ecological data from our network with the South East Wales Biodiversity Records Centre to improve and promote regional natural recording and knowledge sharing.

The public can request to see ecological data collected or held as part of our work by submitting a freedom of information request and is shared with local community groups as applicable.

We are currently creating an internal ecological assets database which will allow our employees to better understand where ecological opportunities and constraints are on our network. This includes recently commissioning lidar and aerial drone surveys to gather more accurate information on habitats and better identify and monitor issues such as ash dieback (of which data will be shared with records centres). This in turn will inform any subsequent short and long-term management plans and budgets.

The TfW ecological assets database will include a dataset identifying biodiversity opportunities across our network which will be informed by ecological data for protected species, sites, habitats, invasive nonnative species and connectivity opportunities (including for example data from Natural Resource Wales' Wales Environmental Information Portal and Buglife's B-lines).

5.5.2 Key performance indicators and metrics

We're working closely with Finance and Business Planning teams to align our budget-setting, strategic planning, and performance frameworks with the Welsh Government's National Indicators, our Corporate Well-being Objectives and Llwybr Newydd Monitoring Measures, supporting our statutory biodiversity duties and environmental objectives.

We're embedding the ecological mitigation hierarchy into procurement processes and asking suppliers to align with this approach where applicable. Progress will be

monitored through contract management and evaluated using the updated Welsh TOMs (Themes, Outcomes and Measures) framework.

5.5.2.1 Relevant key performance indicators and monitoring measures

We will use the following indicators and measures to track our contribution to ecological resilience, biodiversity, and air quality:

TfW's Corporate Well-being Objectives and Wales Transport Strategy Monitoring Measures:

- Level of air pollutants from the transport sector
- Hectares of habitat on the transport estate maintained or improved for biodiversity
- Percentage of transport infrastructure at risk of flooding

From the Welsh Government National Indicators:

- Indicator 15: Amount of waste generated that is not recycled, per person
- Indicator 41: Emissions of greenhouse gases within Wales
- Indicator 43: Areas of healthy ecosystems in Wales
- Indicator 44: Status of biological diversity in Wales

These indicators will be used to align TfW's internal KPIs with national priorities and to monitor progress against our Corporate Well-being Objectives and the Llwybr Newydd Wales Transport Strategy.

5.5.3 Governance and compliance

The original TfW BAP (2021-2026) was approved by our Executive Leadership Team and Board. The updated BAP (2026-2030) is currently being produced and will include review and engagement from our Executive Leadership Team before publication.

Our biodiversity and ecology commitments – including those in the BAP and under the Section 6 duty – are subject to a Monthly Risk Management Review by the Technical Lead for Ecology and Biodiversity, annually by the Head of Sustainability and Climate Change and as required by our Executive Leadership Team (for example for any new strategic risks) to ensure compliance.

5.5.4 Volunteering

Volunteer opportunities are, and will continue to be, encouraged in the organisation through our Corporate Social Responsibility days, such as volunteering to help on any green initiatives TfW is undertaking e.g. maintenance of the office green infrastructure, installation of planters at stations as part of our BAP Biodiversity

Objectives, and signposting to external biodiversity volunteering opportunities as applicable.

5.5.5 Ecological Support

Ecological expertise is available to all employees at TfW via the Ecology and Biodiversity team. This includes general advice, project support, training, technical review and signposting for external assistance as necessary.

5.5.6 Budgets – Biodiversity

Internal budgets allocated for specifically for biodiversity are:

- General biodiversity Initiatives - £5,000 (2025) and £30,000 (2026) - Planned works utilising these budgets include procurement of remote pollinator monitoring equipment and third-party habitat management.
- Green Infrastructure (Llys Cadwyn) - £500
- Nature in the Community - £5k annually – sponsorship of this category of the Tidy Wales awards run by Keep Wales Tidy. This work helps to identify relevant groups to work with in related nature projects

5.5.7 Colleagues and Resourcing

We have expanded our Ecology and Biodiversity team capabilities by recruiting a Principal Ecologist and Ecology Project Delivery Lead between 2024-25.

5.5.8 Funding and Partnerships

We will continue to seek and apply for appropriate funding to enable biodiversity initiatives where appropriate.

Examples of community partners worked with to date include the Enbarr Foundation, Taff's Well Village Hall, Cambrian Village Trust, Bron Fair allotments and Twyn Community Hub.

We work closely with local environmental groups such as the South East Wales River Trust to ensure transparency, support and engagement in our operations.

TfW is a member of numerous local nature partnership groups to ensure our work is aligned and wherever possible, identifying potential opportunities for collaboration.

We've set up an internal process to identify use and recycling of materials including surplus project materials (such as fence posts) which we plan to share with wider stakeholders and groups to utilise.

6 **Review of Section 6 duty**

During the production of this report, we have reviewed our approach to our Section 6 duty.

The key issues and opportunities highlighted are:

- Understanding and creating an effective means of quantifying and delivering an overall gain in biodiversity in our operations to report under our Section 6 duty in the future. In the absence of formalised guidance at this stage for Welsh Government expectations to deliver 'Net Benefit for Biodiversity' under Planning Policy Wales for development projects, this will require continued development.
- Allocating and securing sufficient funding to deliver meaningful biodiversity objectives and goals on an annual basis. This may prove challenging when faced with 'value engineering' criteria and project budget constraints.
- Continued Executive Leadership Team to drive and promote the cultural change and innovation required to meet our legislative biodiversity obligations and responsibilities.
- Organisation-wide training and engagement to drive cultural change and ensure biodiversity is viewed as a core element of our operations; with delivery of this strategically targeted for relevant directorates across the organisation.