

# Environmental Statement: Technical Appendix 8.4 – Natural Resource Wales Letter

ES TA 8.4

Development of National Significance

## Alaw Môn Solar Farm

Land west of the B5112, 415m south of Llyn Alaw, 500m east of Llantrisant and 1.5km west of Llannerch-y-Medd, Anglesey

February 2024



Our ref: P20-947 Alaw Mon Natural Resources Wales Consultation Letter

Your ref:

07 May 2021

Natural Resources Wales  
North and Mid Wales Planning Team  
By email only

northplanning@cyfoethnaturiolcymru.gov.uk

Dear Sir / Madam

**Re: Alaw Môn Solar Farm Consultation**

Enso Energy has commissioned BSG Ecology to complete ecological work with regard to the potential development of a ground-mounted solar photovoltaic (PV) farm and energy storage facility, together with associated infrastructure on land near Llantrisant, Anglesey. The proposed development, which has been named Alaw Môn, will have a generating capacity of approximately 160Mega-Watt (MW). The proposed development exceeds the 10MW threshold for energy generating projects in Wales and therefore constitutes a Development of National Significance ('DNS') under the Planning (Wales) Act 2015.

The site is located on the Isle of Anglesey in North Wales, within the administrative boundary of the Isle of Anglesey County Council (IACC) and extends to approximately 300 hectares (ha). The site is located approximately 500 metres to the east of the small hamlet of Llantrisant and approximately 1.5km to the west of the village of Llannerch-y-medd. A plan of the Site is attached.

The array locations are not currently fixed; however initial layout designs are being devised to take account of ecological constraints including designated sites (see below) and existing habitat features including hedgerows, scrub, ponds and watercourses.

A cabling route is currently being identified which links to an existing grid connection at Wylfa Power Station to the north. The route is likely to be within existing roads or verges.

The purpose of this letter is to inform you of the proposals and associated scope of ecological work to date. It provides some background that will help inform a project discussion that we intend to have via a Discretionary Planning Advice Service (DPAS) meeting. Alongside this request, a formal request for an EIA Scoping opinion has also been submitted to the Planning Inspectorate.

**Ecological and Ornithological Work in 2020**

BSG Ecology has been undertaking work on the site since spring 2020. The scope of work underway or planned is summarised below.

**i) Desk Study and Consultation**

A desk study has been carried out which has involved obtaining data on species and designated sites from Cofnod (North Wales Environmental Information Service) and via online sources: MAGIC.gov and a review of aerial photographs.

In addition to this, we are in the process of initiating discussions with the IACC Ecologist (Dave Cowley, via the Major Projects Planning Officer, Angharad Crump).

There are no European Protected Sites (SACs/SPAs) within or adjacent to the site. Corsydd Mon / Anglesey Fens SAC is the nearest European Protected Site, which is located approximately 6km to the east. SPAs are present around the Anglesey coast; the nearest is Liverpool Bay / Bae Lerpwl SPA, located approximately 9km from the site. Ynys Feurig, Cemlyn Bay and The Skerries SPA is a similar distance to the north, located close to Wylfa nuclear power station.

Nantanog SSSI, a nationally important geological exposure, is located within the site boundary; it will be excluded and buffered from the development area.

Llyn Alaw SSSI, a large mesotrophic open waterbody, lies approximately 325m to the north of the site at its nearest point. The citation refers to wintering wildfowl that approach the threshold (1 % of the population) of national importance: whooper swan, teal and shoveler. A variety of other waterfowl occur, and marginal vegetation features locally-rare plant species.

A Local Wildlife Site (LWS), Cors-y-Bol, is present in the western part of the site. The LWS supports marshy grassland and wetland vegetation and scrub in a shallow valley, with a ditch/watercourse that flows into Llyn Alaw. Another LWS (Tir Pori Traian LWS) is adjacent to, but located outside of, the northern part of the site boundary.

## **ii) Phase 1 Habitat Survey**

An extended Phase 1 habitat survey of the site was carried out in April and May 2020. Habitats present at the site include considerable areas of improved grassland, predominantly grazed by sheep, some marshy grassland, occasional small patches of gorse and willow scrub close to field edges. Fields are separated by hawthorn-dominated hedgerows with occasional field boundary trees. Shelterbelts and small patches of woodland and trees are present, but infrequent, and the landscape is predominantly open.

Ponds are a feature of the area, both within the site and in the surrounding area. Cors-y-bol, a minor stream that discharges to Llyn Alaw to the north, is one of very few running watercourses within or close to the site.

## **iii) Protected Species (including Breeding and Wintering Birds)**

There are 30 ponds within the site and a 500m perimeter area around its boundary; 17 of these were accessed and assessed for great crested newt in spring 2020; eDNA samples were taken from suitable ponds. A positive result was recorded from one pond (Pond 7); this is currently subject to further great crested newt survey to inform the assessment. Three survey visits have been carried out in spring 2021 to date. No great crested newts have been recorded so far from Pond 7, suggesting that the population is likely to be small.

Of the 30 ponds, 13 were not accessed in 2020; they are all off-site on third party land, and access was not possible/obtained. Of these, three are considered to offer no potential to support great crested newt populations as they are managed/stocked fishing lakes; five are distant, being over 250m from the site boundary. Aerial photos suggest that, of the remaining five, three may no longer be present; we are seeking to carry out further assessment on these ponds in spring 2021, if access can be obtained.

The assessment will consider the significance of any access limitations; overall, given the results of the survey work to date, the access limitations are considered unlikely to significantly affect the ability to carry out the assessment or to identify a proportionate mitigation approach. Further survey work for great crested newt is ongoing in spring 2021 (HSI and eDNA survey of any additional accessible ponds, and population class assessment survey of Pond 7).

Breeding bird surveys were undertaken in spring 2020 (three visits, one in April, one in May and one in June) and wintering bird surveys have been carried out in winter 2020/21 (monthly visits from October to March). The breeding bird assemblage is considered to be typical of improved pasture farmland,

being dominated by common and widespread passerines typically of scrub and hedgerow habitats. Curlew occurred on spring passage, but there was no evidence they attempted to breed; foraging buzzard were noted. Few birds are breeding within the open fields: meadow pipit and skylark were recorded occasionally and in very low numbers and were found absent from the majority of the Site.

The focus of the wintering survey work was to determine whether the wildfowl species for which the Llyn Alaw SSSI was notified use the site. Twice monthly visits were completed between October 2020 and March 2021, inclusive. Whooper swan was not recorded using the fields. Small numbers of wildfowl (wigeon, teal) were found to use the larger open pond at Nantanog, Occasional small flocks of waders (golden plover and lapwing) were recorded. Snipe occurs in the wetter areas.

Further checks of water courses for evidence of use by water vole and otter will also be carried out in spring 2020.

#### **iv) Baseline Reports**

We are in the process of producing baseline ecological reports for the site. When complete these can be provided for your information and further comment.

#### **v) Principles of mitigation and enhancement**

Ecology will be taken into account in the design and layout of the proposed together and as part of the landscape management strategy. This is likely to include avoiding and buffering existing habitat features wherever possible, and carrying out enhancement, such as gapping up hedgerows. Such measures will help to demonstrate how the ecological resilience required of development under Welsh planning policy is being delivered through enhancement of existing ecological networks.

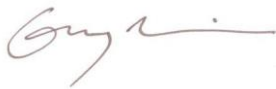
#### **Next Steps**

We would like to understand whether you have concerns with regard to the proposals, and ideally would like to agree that the work completed / in progress is sufficient to assess impacts on key ecological features.

We assume that a DPAS meeting via Zoom, Teams or similar could be used to explore this.

I look forward to hearing from you

Yours sincerely



Guy Miller

Principal Ecologist

For and on behalf of BSG Ecology



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

Ein cyf/Our ref: CAS-148732-G3C7  
Eich cyf/Your ref: DNS 3274702

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14/06/2021

Annwyl Syr/Madam / Dear Sir/Madam,

**BWRIAD / PROPOSAL: CONSTRUCTION OF A GROUND-MOUNTED SOLAR PHOTOVOLTAIC FARM AND ASSOCIATED ENERGY STORAGE FACILITY, TOGETHER WITH ASSOCIATED LANDSCAPING, WORKS, INFRASTRUCTURE AND ACCESS.**

**LLEOLIAD / LOCATION: LAND AT LLANTRISANT ANGLESEY**

Thank you for referring the above proposal for a scoping opinion, which we received on 10/05/2021. NRW has reviewed the information provided in the EIA Scoping Report prepared by Barton Willmore, dated May 2021.

Please note that our comments are without prejudice to any comments we may wish to make when consulted on any subsequent planning application or on the submission of a more detailed scoping report or the full Environmental Statement. At the time of any planning application there may be new information available which we will need to take into account in making a formal response.

These comments include those matters NRW consider will need to be taken into consideration and applied to the Environment Impact Assessment (EIA) and the resulting Environmental Statement (ES).

### **Flood Risk**

With regard to flood risk, we are satisfied that the applicant has outlined that a Flood Consequences Assessment (FCA) report will be prepared, which assesses the potential risk of flooding to the site, and the potential impacts of the proposals on flood risk elsewhere. The FCA will need to demonstrate that the flood risk in any flood zone (Zone B or C) can be acceptably managed in accordance with TAN 15.



The Lead Local Flood Authority (LLFA), in this instance the Isle of Anglesey County Council (IACC), are the lead authority on flood risk from surface water and flooding from ordinary watercourses. The applicant should therefore consult with the Authority's drainage engineers in respect of any issues relating to flooding issues from these sources.

We note there is a small section in the south west of the proposed site which runs adjacent to a main river (Cors y Bol). NRW have permissive powers in relation to any main rivers which we may use in relation to our Flood Risk management duties therefore any proposals within 8m of the main river may require a Flood Risk Activity Permit (FRAP). Further information can be found on our website [here](#).

### **Protected Species**

The EIA for this development should include sufficient information to enable the determining authority to determine the extent of any environmental impacts arising from the proposed scheme on legally protected species,

Evaluation of the impacts of the scheme should include: direct and indirect; secondary; cumulative; short, medium and long term; permanent and temporary; positive and negative, and construction, operation and decommissioning phase and long-term site security impacts on protected species.

### **Illustrations within the Environmental Statement**

Any maps, drawings and illustrations that are produced to describe the project should be designed in such a way that they can be overlaid with drawings and illustrations produced for other sections of the EIA such as biodiversity.

### **Description of Biodiversity**

The EIA must include a description of all the existing natural resources and wildlife interests within and in the vicinity of the proposed development, together with a detailed assessment of the likely impacts and significance of those impacts.

### **Significance and Favourable Conservation Status**

We advise that the EIA considers significance (both alone and in combination) and where applicable conservation status. In respect of conservation status, we advise that consideration be given to current conservation status (CCS), and demonstration of no likely detriment to the maintenance of favourable conservation status (FCS) during construction operation and decommissioning phases of the scheme.

## Key Habitats

Any habitat surveys should accord with the NCC Phase 1 survey guidelines (NCC (1990) Handbook for Phase 1 habitat survey. NCC, Peterborough). We advise that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present. We also advise that Habitats Directive Annex 1 habitats are identified as part of this assessment.

We advise the site is subject to assessment to determine the likelihood of protected species, and that targeted species surveys are undertaken for all species scoped in. These should comply with current best practice guidelines and in the event that the surveys deviate or there are good reasons for deviation that full justification for this is included within the EIA.

Should protected species be found during the surveys, information must be provided identifying the species specific impacts in the short, medium and long term together with any mitigation and compensation measures proposed to offset the impacts identified. We advise that the EIA sets out how the long term site security of any mitigation or compensation will be assured, including management and monitoring information and long term financial, tenure, and management responsibility. Where the potential for significant impacts on protected species is identified, we advocate that a Conservation Plan is prepared for the relevant species and included as an Annex to the ES.

Where a European Protected Species is identified and the development proposal is predicted to likely contravene the legal protection they are afforded, a licence should be sought from NRW. The EIA must include consideration of the requirements for a licence and set out how the works will satisfy the three requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended). One of these requires that the development authorised will 'not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range'. These requirements are also translated into planning policy through Planning Policy Wales (PPW) May 2021, section 6.4.22 and 6.4.23 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The determining authority will take them into account when considering the EIA where a European Protected Species is present.

With respect of Great Crested Newts, we advise that traditional surveys should be used to compliment eDNA surveys. A negative eDNA result should not be used to state that the species is absent.

## Long term Maintenance

The scope of the ES should include details on the maintenance of the panels during the operational phase, particularly. what materials will be used to clean the panels, and any possible impacts on biodiversity.

## Biosecurity

The submitted information should also detail biosecurity measures, which should include measures to control, remove or for the long-term management of invasive species both during construction and operation.

### Local Biodiversity Interests

We recommend that the developer consults the local authority Ecologists on the scope of the work to ensure that regional and local biodiversity issues are adequately considered, particularly those habitats and species listed in the relevant Local Biodiversity Action Plan, and areas that are considered important for the conservation of biological diversity in Wales.

NRW would expect the developer to contact other relevant people/organisations for biological information/records relevant to the site and its surrounds. These include the relevant Local Records Centre (Cofnod) and any local ecological interest groups (E.g. bat groups, mammal groups).

### Protected sites

The Nantanog SSSI lies within the development boundary, and has been designated for its geological interest. The development is 423m from Llyn Alaw SSSI, which includes several species of over-wintering wildfowl; including whooper swan, shoveler and teal, and breeding tufted duck as its notified features. The proposal is also adjacent to Cors y Bol wetland, which drains into Llyn Llywenan SSSI, 2.1km away.

The ES will need to identify impact pathways for protected sites, clearly assess the possible levels of impact and, where impacts are likely, should provide full details of appropriate mitigation measures to address those impacts.

We note the proposal is located partly within Nantanog SSSI. The ES will need to clearly demonstrate how impacts on the geological feature has been avoided.

The Construction Environmental Management Plan (CEMP) will need to identify all the potential pollution risks from the proposal and ensure that there are adequate mitigation measures put in place to prevent pollution from occurring for each risk identified. The applicant should refer to PPG6 – pollution prevention guidelines for construction and demolition sites.

The proposal has the potential to impact on mobile features (e.g. birds) of protected sites. We advise that any planning application should assess whether the proposed site is used (e.g. for feeding) by birds that form part of a designated feature of a SSSI or SPA i.e. assess whether the site is functionally linked to a SSSI/SPA. The ornithological survey work to date appears appropriate but more details regarding timing and results are required before it can be concluded whether further survey is required. Our advice for other solar farms where there is potential winter waterfowl/wader interests is the inclusion of nocturnal visits to assess usage of fields. In addition, Greenland White-fronted Geese, possibly linked to the



Dyfi SPA population, have been known to use fields in the vicinity of Llyn Alaw. We would therefore recommend that this is considered within the EIA.

## **Protected Landscapes**

NRW's landscape planning advice relates to the development's potential impact on the Ynys Môn AONB's landscape character, visual amenity and special qualities and its accordance with national policy.

Section 3.24 of the EIA Scoping Report indicates an initial study area of 5 to 7.5km from the site boundary has been reviewed. This is shown on Appendix 4 Initial zone of theoretical visibility figure, drawing number LN-LP-03 Revision A. The Ynys Môn AONB lies within the study area, but this statutory designated landscape has not been referred to within the baseline assessment.

From our review, we note the site lies at more than 5km inland from the boundary of the Ynys Môn AONB. At this distance and given the limited topographical variation across the study area, we consider the solar farm development is unlikely to cause significant effects upon visual receptors in the AONB.

The indicative grid connection route shown at Appendix 2 lies outside of the AONB. The closest it comes the designated boundary is approximately 450m to the north west of the village of Llanrhyddlad. We consider this component is unlikely to cause a significant effect upon visual receptors in the AONB.

We conclude the assessment of development effects on the Ynys Môn AONB do not need to be scoped into the EIA.

## **Other Matters**

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

**Rhys Jones**

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning  
Cyfoeth Naturiol Cymru / Natural Resources Wales