lightsource bp

Plas Power Solar and Energy Storage Project

3.0.2 Consultation Report (Part 1 of 2)



June 2024
DNS Ref: DNS/3253253

Plas Power Solar and Energy Storage Project

Consultation report

June 2024

Lightsource bp

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1. Executive summary

1.1 This pre-application Consultation Report details the early engagement, non-statutory and statutory consultation for Plas Power Solar and Energy Storage Project.

1.2 Specifically, this report provides:

- An account of the statutory consultation, publicity, deadlines set, and activities required under section 61Z of the Town & Country Planning Act 1990 ('the 1990 Act') and the Developments of National Significance (Procedure) (Wales) Order 2016 (as amended) ('the Order'), including:
  - details of the statutory consultation notifications with specialist consultees, community consultees, landowners and occupiers and non-statutory consultees (refer to **Chapter 4**).
  - details of the statutory publicity including published documents, site notices and statutory press notice and advertising (refer to **Chapter 5**).
  - declarations that the relevant notices and publication requirements comply with the Act and Order (refer to **Chapter 6**).
- a summary of all issues including confirmation of whether the issues raised have been addressed and, if so, how (refer to **Chapters 7**) and
- the particulars of all responses received from persons consulted, including copies of responses from specialist consultees; and the account taken of these (refer to **Chapters 8**).

1.3 **Chapter 9** gives details of all the main issues raised by the non-statutory consultees.

1.4 The consultation undertaken was fully compliant with the statutory requirements for a DNS planning application pre-application consultation process, and with the consultation plan (attached as **Appendix 1**).

1.5 Lightsource SPV 192 Ltd (herein referred to as Lightsource bp) engaged and consulted on the Proposed Development between 2021 and 2023, prior to the statutory pre-application consultation in 2024.

1.6 Following the engagement and non-statutory consultation between 2021 and 2023, there were significant changes to the Proposed Development including the removal of fields to avoid use of Best and Most Versatile (BMV) agricultural land and to minimise impacts on sites of cultural and heritage sensitivity. Lightsource bp also proposed the potential option to include energy storage in the project. Further changes were made following the non-statutory consultation in June and July 2023, and subsequent engagement with neighbouring residents. Key changes to the proposals included:

- confirmation of the inclusion of energy storage as part of the Proposed Development;
- removal of a field and increased set-backs from residential properties to reduce impacts on residential amenity;
- inclusion of landscape and habitat areas, and more detailed landscape and ecology proposals;
- increased set-back from Plas Power Woods (ancient woodland);

- a new site access off the A525;
- diverted routes for Public Right of Ways along more suitable alignments (in consultation with WCBCs Public Right of Way officer); and
- potential cable route options connecting the solar farm and energy storage to the existing Legacy substation.

1.7 The statutory consultation took place between 20 February 2024 and 9 April 2024 and consulted on the updated proposals together with the draft DNS application. The issues raised are detailed in **Chapters 8** and **9**. Lightsource bp have sought to address the consultee responses, and have responded directly to the statutory consultee responses. In summary, the key issues raised by the consultees, including the community, include:

- Concern over scale of the Proposed Development and impacts on the landscape;
- Residential and visual amenity impacts on properties to the north of the site;
- Set-backs from ancient woodlands and veteran trees adjacent to, and within the site;
- Safety of the battery energy storage system and management of fire water if needed;
- Potential impacts on traffic, particularly along the A525; and
- Proposal for community benefits.

1.8 In response to the comments received, the following changes have been made to the proposals and included in this Application:

- Additional planting of trees and hedgerows to the north of the site to provide a greater level of screen to properties on Tan Llan;
- Increased set-backs from ancient woodlands and veteran trees adjacent to and within the site; and
- An updated drainage strategy to ensure water to manage water on site, including management of fire water (in the unlikely event it is needed), to avoid impacting on nearby watercourses.

1.9 A number of technical comments on the Proposed Development and Environmental Impact Assessment (EIA) were raised by the statutory consultees in relation to archaeology, scheduled ancient monuments, flood risk and drainage, pollution prevention, landscape and visual, ecology, access and decommissioning. **Chapter 8** details how Lightsource bp has considered and address these technical comments.

2. Introduction

2.1 This Consultation Report and accompanying appendices constitute the statutory consultation report prepared by Grasshopper Communications to support a Development of National Significance (DNS) application for the Plas Power Solar and Energy Storage Project (the 'Proposed Development') near Coedpoeth, Wrexham.

2.2 This document meets the requirements set out under sections 5, 7, 8, 9 and 11 of The Order and provides an account of the statutory consultation, publicity, deadlines set, and activities required under section 61Z of the Town & Country Planning Act 1990 ('the 1990 Act'). The document includes copies of all relevant notices, declarations of compliance and relevant details of required consultees.

2.3 This Consultation Report includes a summary of all issues raised, confirmation of whether the issues raised have been addressed and, if so, how. It also sets out particulars of the responses received from the persons consulted and the account taken of these responses.

2.4 Lightsource bp carried out extensive, non-statutory, informal consultation and the statutory formal consultation prior to the submission of the planning application.

2.5 This Consultation Report details how Lightsource bp has complied with the provisions of the Order and associated legislation in relation to its statutory duties for pre-application consultation for the Proposed Development.

Proposed Development

2.6 The Proposed Development includes the construction and operation of a solar photovoltaic electricity generating station ('solar farm'), a Battery Energy Storage System ('BESS') and associated ancillary development. The solar element of the Proposed Development is anticipated to have an export capacity of 57 megawatt, alternating current (MWac) and the BESS will have an installed capacity of 57MWac. At the end of the Proposed Development's 40-year life it will be decommissioned, dismantled, and removed with the Site being restored.

2.7 The Proposed Development site (the 'Site') is approximately 136 hectares and located on the Plas Power Estate, Ruthin Road, Wrexham. The Site is immediately east of Coedpoeth and approximately 2.5 km to the west of Wrexham city centre. It is wholly within the administrative boundary of Wrexham County Borough Council ('WCBC'). The nearest settlements are Coedpoeth, New Broughton, Wrexham, Rhostyllen, and Talwrn.

2.8 The Proposed Development will include an underground cable that will connect the solar farm, BESS and associated infrastructure to the existing Legacy Substation located approximately 1.2km to the south-west of the Site, north of the B5246 Bronwylfa Road.

2.9 The Site comprises several agricultural fields, primarily used for pasture grazing, bound by a mixture of mature woodland, trees, hedgerows, fencing, agricultural tracks, and roads. It is estimated that the solar project would generate and export up to 57MWac of electricity, which is equivalent to providing enough power to meet the annual electricity needs of **approximately 22,700 homes** and **saving 15,800 tonnes of carbon**. Additionally, the energy produced once the Proposed Development is operational will

reduce reliance on imported fossil fuel energy sources, providing greater energy security at a national scale.

2.10 The Proposed Development will contribute towards the Welsh Government's 2030 targets for renewable energy and carbon emission reductions.

Overview of consultation process

Consultation and Engagement

2.11 A PEDW Plas Power Inception Meeting was held on 3 October 2019. This provided an opportunity to introduce the Applicant (Lightsource bp), the Proposed Development, and explain why Site was considered to be a good site for solar.

2.12 A pre-application meeting was held on 19 December 2019 between the Lightsource bp and WCBC. During this meeting, Lightsource bp set out its proposed extensive stakeholder engagement process to be undertaken at suitable stages of the Proposed Development.

2.13 The initial Proposed Development were first consulted on in October 2020 when a formal request Scoping Direction was sought from Welsh Ministers. A revised Scoping Direction was sought in June 2023 with Scoping Directions received December 2020 and October 2023 respectively. Further details in relation to this are provided in **Chapter 4** of the **Environmental Statement** (Doc ref. 4.1.04).

2.14 In line with Regulation 33(7) of the EIA Regulations, formal consultation was undertaken by the Planning Inspectorate (now PEDW) with the following bodies on the request for a Scoping Direction:

- the relevant Local Planning Authority, WCBC,
- National Resources Wales (NRW),
- Cadw,
- The Coal Authority,
- The Welsh Ministers (i.e. Transport and Soil, Peatland & Agricultural Land Use Planning Directorates of the Welsh Government),
- The Health and Safety Executive (HSE), and
- North Wales Fire and Rescue Service (FRS)

2.15 Lightsource bp continued to engage with the statutory consultees following the Scoping Direction on the detailed scope of assessment, potential impacts and proposed mitigation including WCBC, NRW, CADW and North Wales FRS.

2.16 PEDW responded to a request for pre-application advice in January 2021, responding to several matters including the scope of non-EIA application documents, and consultation requirements. PEDW indicated that there were no concerns on individual assessment approaches.

2.17 Initial engagement and consultation with neighbours and the local communities was undertaken in 2021 to introduce the Proposed Development and obtain initial feedback, as well as provide an overview of the planning process. Details of this non-statutory consultation are set out in **Chapter 3.**

2.18 Following feedback at this stage, and in response to the environmental surveys and assessments, the Proposed Development was revised including the removal of a parcel of land to the south, and inclusion of new land to the north. There was limited engagement in this period. Further engagement took place in spring/summer 2023 with key political stakeholders, neighbouring residents, and the local communities.

2.19 A pre-application meeting was held with PEDW on 7 February 2023 on changes to provide an update on the feedback to date, changes to the Proposed Development, initial assessment outcomes and the next steps.

2.20 Following briefings with key political stakeholders in spring 2023, the non-statutory consultation was launched from 12 June 2023 to 27 July 2023. The responses gathered during these consultation periods fed into the Proposed Development that were consulted on during the statutory consultation. Details of the non-statutory consultation are set out in **Chapter 3.**

2.21 A pre-application services meeting with PEDW was held on 21st September 2023. The secondary consent requirements were discussed, as well as the scope for any future submission. Lightsource bp also provided PEDW with a general update on the scheme evolution.

2.22 Lightsource bp provided formal notification to the PEDW of its intention to submit a DNS application for the Proposed Development in October 2023. PEDW provided its formal acceptance on 6 October 2023 year.

2.23 The statutory pre-application consultation took place between 20 February 2024 and 9 April 2024, lasting 50 days. Details of the statutory consultation are set out in **Chapters 4** and **5**, and feedback is summarised in **Chapters 7, 8,** and **9.**

Stakeholder mapping and identified consultation zone

2.24 Prior to engaging with stakeholders and the community, a stakeholder mapping report was prepared that identified relevant elected representatives including local ward members and community councils.

2.25 The majority of Site falls within the Coedpoeth ward with the south-east corner falling within the Esclusham ward. Images 1 and 2 below show the location of the site in the context of ward and community council boundaries.

Image 1: Ward Map

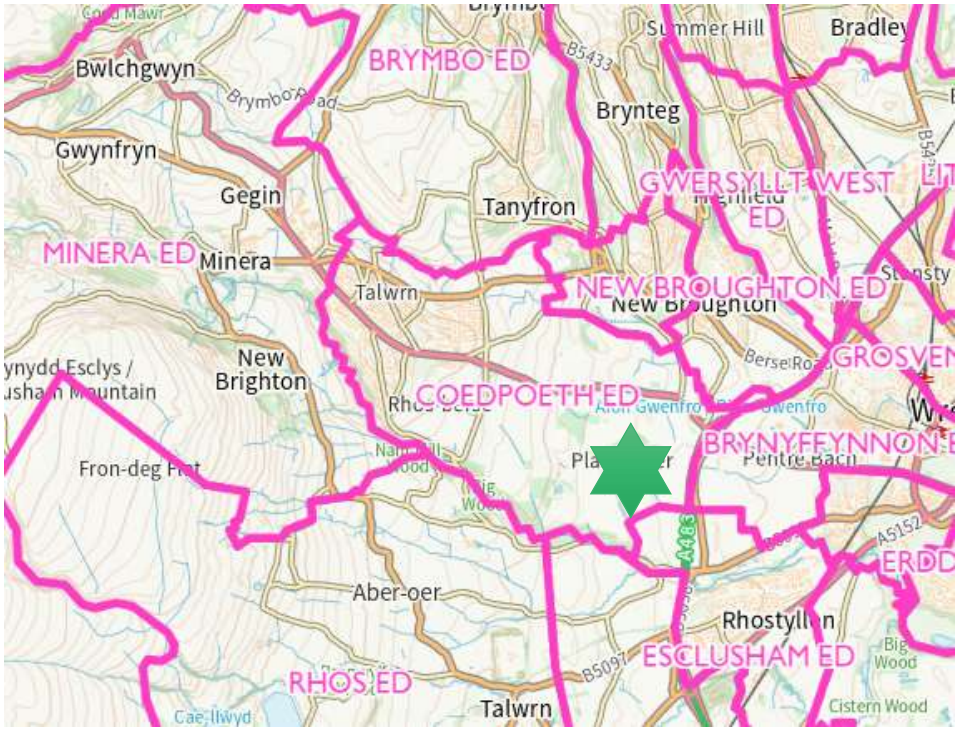
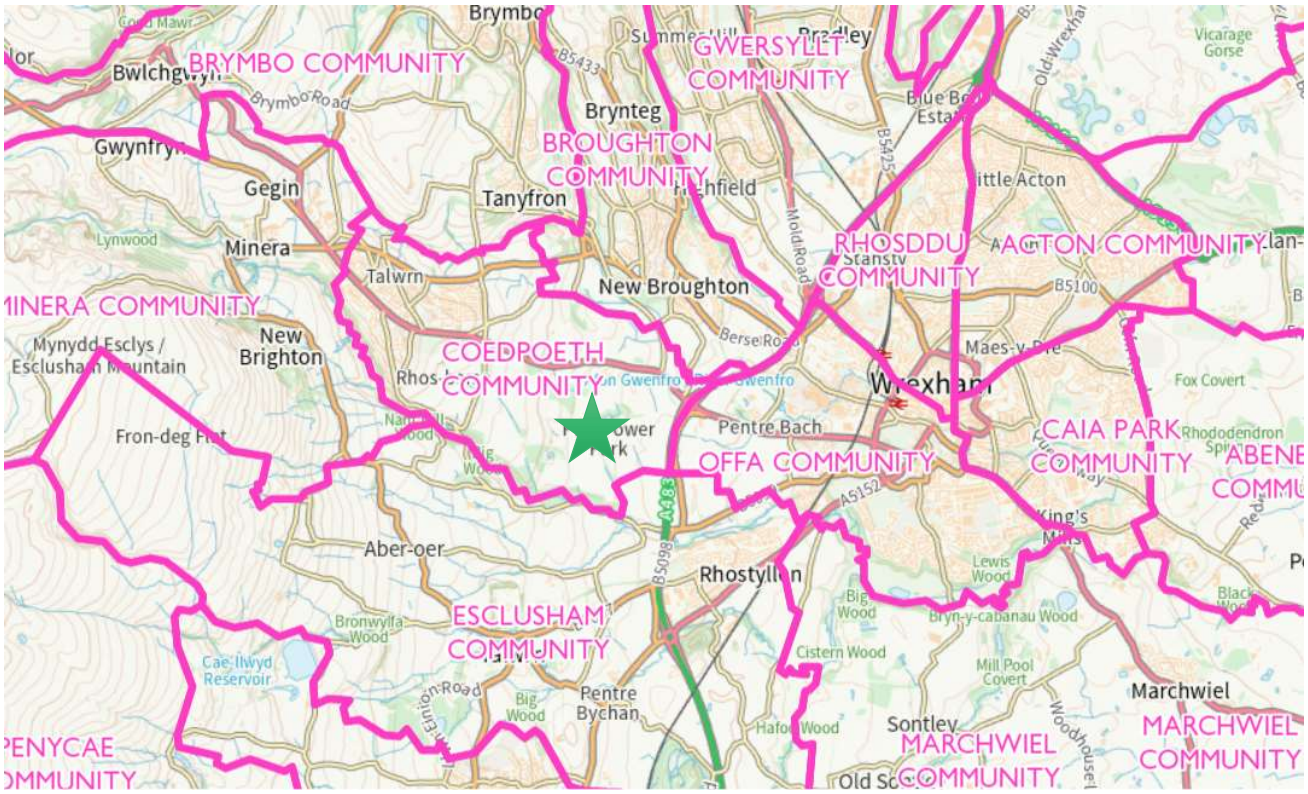


Image 2: Map of community councils



2.26 For the launch of the non-statutory consultation in 2023, the consultation zone was reviewed. A consultation zone was identified incorporating key communities around the Site including Coedpoeth, New Broughton and Rhostyllen which were directly engaged and notified of the consultations. The eastern boundary of the consultation zone was defined by the A483 which is a dividing feature of this community. The community of Rhostyllen was included as it is the nearest community to the part of the site which is situated in the Esclusham ward. This consultation zone (attached as **Appendix 2**) included 4,637 residential and 113 business addresses.

Audiences

2.27 In line with DNS guidance and best practice, every effort was made to approach all relevant stakeholders, local communities and relevant organisations that may be affected by the Proposed Development. Those contacted included community consultees, technical consultees or relevant persons likely to be classed as prescribed consultees during the future statutory consultation. A communications strategy was produced at the start of the consultation alongside a detailed stakeholder mapping report which together identified the key target stakeholder to engagement at different stages of the consultation:

Tier 1 – highest priority key stakeholders to be engaged at early engagement and direct engagement through consultation process.

- **Site Community Council**
  - Coedpoeth Community Council
  - Esclusham Community Council
- **Site Local Authority Ward Members**
  - Cllr Krista Childs
  - Cllr Mark Pritchard
  - Councillor Anthony Wedlake
- **Local MP**
  - Simon Baynes MP
- **Local MS**
  - Ken Skates MS

Tier 2 – statutory consultees to be directly throughout consultation process.

- **Specialist consultees**
- **Adjacent landowners**
- **Relevant parties**

Tier 3 – wider community consultees directly targeted during informal and statutory consultation.

- **Adjacent community councils**
- **Community venues**

Tier 4 – wider non statutory stakeholders engaged during informal and statutory consultation.

- **Adjacent ward members, MP, MS**

- **Member of the Planning Committee and Cabinet members for the Environment and Planning**
- **Community stakeholders**
- **Interest stakeholders**

Tier 5 – Wider community engaged during informal and statutory consultation.

- **Wider residents, businesses and visitors**

2.28 All Tier 1 to 4 stakeholders were notified of the non-statutory and statutory consultation.

Contact Channels

2.29 At the start of the non-statutory consultation in 2021, Lightsource bp launched communication channels to allow communities to contact Lightsource bp with any queries on the Proposed Development. This included a telephone line (0333 200 0755), email (info@lightsourcebp.com), online contact form, postal address, and social media.

2.30 For subsequent engagement and consultation during the non-statutory and statutory consultation, Lightsource bp and Grasshopper Communications established dedicated project channels which were monitored from April 2023 to date, comprising:

- **A freephone information line** – A freephone telephone number, 01978 800675, was available for anyone who wished to contact the project team via phone. The freephone number was staffed Monday to Friday from 09.00 - 17.00;
- **A dedicated freepost address** – A freepost address (no stamp required) was hosted at FREEPOST GRASSHOPPER CONSULT enabling respondents to provide written feedback free of charge; and
- **A project email** – A project email address, plaspowersolar@lightsourcebp.com.

Project website

2.31 A project webpage, lightsourcebp.com/uk/project/plas-power, was set up at the start of the initial engagement and consultation in 2021 to share information about the Proposed Development, host the draft planning application for statutory consultation and provide updates on the Proposed Development .

Legislative context

2.32 Due to the scale of the Proposed Development, it is classed as a DNS and a planning application will be submitted to the PEDW for determination by Welsh Ministers. This applies to all energy generation projects between 10MW and 350MW.

2.33 The DNS Procedural Guidance provides the following advice on the importance of early engagement:

2.1 It is strongly encouraged that applicants enter into a general dialogue with PEDW about their application and the DNS process in the early stages of project design. These Inception meetings have proven to be of benefit to applicants and improved understanding of the DNS process.

2.2. Prior to submission, early engagement with communities, local planning authorities (LPAs), statutory consultees and other interested parties provides an opportunity to overcome any potential issues with the proposal. The ability to amend a scheme following submission of a DNS application is very limited. Consequently, it is important that applicants seek to resolve any issues prior to submission and early engagement with these bodies is strongly encouraged by PEDW.

2.3. At an early stage, applicants should consider whether related licenses or consents are required from other bodies, such as Natural Resources Wales (NRW). Applicants should aim to 'twin-track' related consents with their DNS application to avoid delays later in the process. Processing DNS applications would not be delayed by this, but the scheme may be delayed if there is a need to wait for other consents to be approved.

2.4. Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) processes should also be iterative and considered early on in the development of a DNS project.

2.34 Following the notification stage, prior to submitting the full DNS application to PEDW, statutory pre-application consultation is required for a minimum of six-weeks (42 days) and must include:

- Consulting specific community consultees, specialist consultees and any relevant persons (as defined in Article 9 of the Order);
- Serving written notice on owners or occupiers of land adjoining the Site;
- Displaying site notices in at least one place, on or near the Site; and
- Placing a notice in a local newspaper.

2.35 The planning application needs to be accompanied by a consultation report that gives an account of the consultation undertaken, summarises the issues raised, provides a response to representations made and explains how comments have been addressed in the final plans as appropriate.

Well-being of Future Generations (Wales) Act 2015

2.36 The aim of the Act is to improve the social, economic, environmental and cultural well-being of Wales, making the public bodies listed in the Act: think more about the long-term, work better with people, communities and each other, look to prevent problems, and take a more joined-up approach.

2.37 The Act puts in place seven well-being goals:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh Language
- A globally responsible Wales.

2.38 The Future Generations Act enshrines these goals in law, ensuring that all public bodies work towards achieving all of them. The legislation sets out the five ways of working to meet the well-being goals:

- **Long term** – considering the importance of balancing short-term needs with the needs to safeguard the ability to also meet long-term needs.
- **Integration** - considering how the Proposed Development may impact upon each of the well-being goals, on the Proposed Development's objectives, or on the objectives of other public bodies.
- **Involvement** - involving people with an interest in the Proposed Development and ensuring that those people reflect the diversity of the area the Proposed Development's affects.
- **Collaboration** – acting in collaboration with any other person (or different parts of the body itself).
- **Prevention** - acting to prevent problems occurring or getting worse.

2.39 Although Lightsource bp is not required by law to observe the Act, it is committed to helping deliver positive well-being outcomes for WCBC and observing the required Ways of Working.

Wales Principles of Public Engagement

2.40 It will be important to ensure that WCVA's National Principles for Public Engagement in Wales[1] are reflected in the engagement and consultation strategy for the Proposed Development. The strategy is designed to deliver a well-planned programme making

[1] https://thirdsectorsupport.wales/resources/national-principles-for-public-engagement-in-wales/

sure that all stakeholders and residents affected by the Proposed Development are involved in a timely and appropriate way.

2.41 The pre-application consultation process must consult with those stakeholders detailed in section 61Z of the 1990 Act and the Order.

Welsh language

2.42 Lightsource bp is committed to promoting Welsh language and culture. Welsh is treated as an equal language to English for community and stakeholder engagement. All key consultation materials were produced in Welsh and English.

Consultation Requirements

2.43 This Consultation Report includes the following as required by section 11(2) of the Order as set out in Figure 1 below.

Figure 1: Statutory Consultation requirements

Requirement	Location
(a) a copy of the notice referred to in article 8(1)(a)(i);	**Appendix 13:** Site Notice
(b) a declaration that the notice referred to in article 8(1)(a)(i) was displayed in accordance with the requirements of that article;	**Appendix 24:** Declaration of Compliance
(c) a list of the addresses of the persons who were given notice of the proposed application in accordance with article 8(1)(a)(ii) and a copy of the notice given to such persons;	**Appendix 7:** Copy of notice **Appendix 8:** Community consultees notification email and list of consultees **Appendix 9:** Relevant persons notification email and list of consultees **Appendix 10:** List of owner / occupiers
(d) a copy of the publication referred to in article 8(1)(a)(iii);	**Appendix 16:** Statutory notice in the press
(e) a declaration that Lightsource bp has complied with the publication requirements in article 8(1)(b);	**Appendix 24:** Declaration of Compliance with Act / Order

(f) copies of all notices given to community consultees, relevant persons and specialist consultees in accordance with articles 9(2) and 9(3);	**Appendix 5:** Schedule 2 9(3) notice (Specialist Consultees) **Appendix 7:** Schedule1 8&9(2) notice (Community Consultees, relevant persons and landowners)
(g) a summary of all issues raised by any person notified of the proposed application in accordance with section 61Z(3) of the 1990 Act and articles 8 and 9(2), including confirmation of whether the issues raised have been addressed and, if so, how; and	Chapters 8 and 9
(h) copies of all responses received from specialist consultees with an explanation of the account taken of each response	Chapter 8 and **Appendix 25**

3. Non-statutory consultation

Initial engagement and consultation

3.1 Lightsource bp commenced initial engagement in 2021 to introduce the Proposed Development and obtain initial feedback as well as provide an overview of the process.

3.2 A Community Information Pack was sent to local residents (see image 3 and 4 below).

Image 3: Community Information Pack 1



Who are we?

Lightsource bp is a global leader in the development and management of solar energy projects. We work closely with local businesses and communities to supply clean, dependable and competitively priced energy, and we're dedicated to securing a low-carbon future, in the UK and worldwide.

Community engagement

It's important to us that the local community are fully informed of the plans for the site, and have the opportunity to comment and learn about the proposal in advance of our formal draft submission to the Planning Inspectorate. We will be holding an online Q&A event to provide details about our project ideas at this stage, and to give you a chance to speak to our team.

Our online Q&A session will take place on 21 October 2021. The session will be run in Welsh language at 7pm, and then in English language at 8pm. Please join either meeting at that time via the project webpage at www.lightsourcebp.com/uk/proposed-projects/plas-power-solar-project/

We want to ensure that our engagement is inclusive and are aware that not everyone within the community will have access to the internet. Therefore, if you would like to receive a call back from the team to discuss the project or know of someone who would, we would be pleased to arrange this at a convenient time.

Find out more

If you have queries in relation to this project, please contact the project team by calling 0333 200 0755, or emailing info@lightsourcebp.com, quoting "Plas Power". You can also message us on Facebook or write to us at Lightsource bp, 7th Floor, 33 Holborn, London, E1CN 2HU.

lightsource bp

t 0333 200 0755
e info@lightsourcebp.com
www.lightsourcebp.com

Community Information Pack

PROPOSED SOLAR FARM AT PLAS POWER ESTATE, RUTHIN ROAD, WREXHAM LL11 3BS

Lightsource bp is working on a proposal for a solar farm at Plas Power Estate. We will fund the development of the project and connect it to the local electricity network, providing an output capacity of 80MWp (megawatts).

We've chosen this site after careful consideration, and we're now undertaking a wide range of environmental assessments to help shape our plans. These include landscape and visual, heritage and archaeology, ecology and ornithology, flood risk and more.

An important part of the planning process is engaging with local communities to provide more information on our proposals and gather feedback. Due to the ongoing COVID-19 situation in the UK, we are seeking to ensure that our community engagement is undertaken safely. Safety is one of our core values, and in order to keep to the high standards of community engagement that we've set as a company we're replacing our community consultation event with an online Q&A session, on 21 October 2021.

Statistics

- **82,911 MWh** (Megawatts hours) supplied per year
- Equivalent to the energy needs of **22,222** UK households
- **348** acres of land
- **22,991** tonnes of carbon emissions saved
- Equivalent to taking over **12,678** cars off the road
- Equivalent to powering **53,128** Electric Vehicles per year

This project will contribute towards the Welsh Government 2030 targets for renewable energy and carbon emission reductions.

Get involved!

Community Information Event

We've set up a dedicated webpage for this proposed project at www.lightsourcebp.com/uk/proposed-projects/plas-power-solar-project/, with further project information and opportunities to get in touch with us to discuss the proposal.

Our online Q&A session will take place on 21 October 2021. The session will be run in Welsh language at 7pm, and then in English language at 8pm. Please join either meeting at that time via the project webpage above.

lightsource bp

t 0333 200 0755
e info@lightsourcebp.com
www.lightsourcebp.com

Image 4: Community Information Pack 2



3.3 The mailing radius was 1km from the Site capturing the closest neighbours, and communities in Coedpoeth, Bersham, Rhostellyn, New Broughton, and Southsea.

3.4 Due to the COVID-19 restrictions in the UK at the time, and to ensure that community engagement was undertaken safely, Lightsource bp hosted an online webinar with a Q&A session on 21 October 2021. This was held in both Welsh and English language.

3.5 A dedicated webpage was established providing further information and about the Proposed Development contact details.

3.6 Following the non-statutory consultation in 2021, there were a number of changes to the Proposed Development including the removal of land parcels south of the Plas Power Woods due to the cultural heritage sensitivities in the immediate surrounding area and the grade of agricultural land, which was assessed to be predominantly best and most versatile.

3.7 Another key change to the design over this period was the inclusion of land parcels north of the A525 which were determined to be suitable for siting solar for a variety of reasons but notably due to the following: no planning or environmental designations; established hedgerows onsite and areas of woodland providing well established screening; accessibility off the A525; and the land is of lower grade agricultural land (Grade 3b) and not considered to be best and most versatile agricultural land.

Non-statutory consultation

3.8 This section gives an overview of the non-statutory consultation. Full details of the non-statutory consultation are detailed in the Interim Consultation Report (attached as **Appendix 3**).

Early elected representative engagement

3.9 Prior to the launch of the non-statutory consultation in 2023, key political stakeholders were sent an email on 28 April 2023 and invited to a meeting to inform and updated them about the Proposed Development. These included:

- Simon Baynes MP Clywd South
- Ken Skates MS Clywd South
- Cllr Krista Childs and Anthony Wedlake (ward members for Coedpoeth)
- Cllr Mark Pritchard (Leader of the Council and member for Esclusham ward)
- Coedpoeth and Esclusham Community Councils

3.10 Responses were received, and meetings set up with the following to provide and update on the Proposed Development, key environmental considerations, community benefit and the programme for submission of a DNS application:

- Ken Skates - MS for Clwyd South on 11 May 2023
- Coedpoeth Community Councillors - Anthony Wedlake and Krista Childs on 7 June 2023

3.11 In these meetings Lightsource bp presented the changes to the Proposed Development since 2021, provide an update on the environmental surveys and assessments, the potential impacts and proposed mitigation, opportunities to provider wider environmental and community benefit, and the draft programme to submission of the application including future pre-application consultation. Following the presentation there was an opportunities for questions and answers.

Informal consultation

3.12 Non-statutory informal consultation took place between 12 June 2023 and 27 July 2023. The consultation was advertised through media releases and adverts in the local press, erecting posters in key communities, and distributing the newsletter to all statutory and non-statutory consultees and all business and residential the consultation zone.

3.13 Information about the Proposed Development was publicly available via a project website and virtual exhibition. Three public exhibitions were held in accessible venues in Coedpoeth and Esclusham.

3.14 Consultees were encouraged to submit their feedback via email, feedback form (online or hard copies at the exhibitions) or telephone.

3.15 A total of 25 feedback forms were completed online or returned using the freepost address and 24 emails and three telephone enquiries were received during the non-statutory consultation with:

- 5 giving feedback on the consultation
- 18 consultation related enquiries
- 1 other type of enquiries.

3.16 Participants in the consultation showed support in principle for the Proposed Development and recognised the need for greener energy and meet renewable energy targets, along with the potential to provide habitat enhancements and boost biodiversity. There was also recognition of the potential suitability of the site, particularly in terms of the existing woodlands and trees providing a good level of screening.

3.17 Key issues raised during the early engagement consultation:

- The visual impact of the Proposed Development.
- The potential to impact on ancient woodlands and other habitats in the area.
- The potential for the Proposed Development to worsen existing traffic problems (either directly through additional vehicles, or indirectly by preventing junction improvements to the A483/A525).
- The need for existing public rights of way (PRoW) networks to be retained and enhanced.
- The cumulative impact of developments in the area.
- The potential for Lightsource bp to establish a community benefit fund to fund local Community Council projects.

3.18 The feedback to consultation was reviewed and considered, and in response changes were made to the Proposed Development to mitigate potential impacts and provide environmental enhancements and community benefits. Additional engagement was undertaken with neighbouring residential properties, and other key stakeholders, following the non-statutory consultation and prior to the statutory consultation.

Other non-statutory engagement

Specialist consultee engagement

3.19 Further engagement was held with specialist consultees between 2023 following the updated Scoping Direction and the submission of the application in 2024. The purpose of the engagement was to introduce and update the consultees on the Proposed Development, respond to the Scoping Direction, discuss the assessment scopes in more detail, along with potential impacts, mitigation, and opportunities to deliver wider environmental benefits.

3.20 A summary of the additional engagement with specialist consultees is provided in Figure 2 below:

Figure 2: Summary of additional engagement with specialist consultees

Specialist consultee	Date of engagement	Scope of engagement
WCBC (Planning Department)	Meeting: 9 March 2023	<u>General</u> - Proposed Development update, including evolution in design. - Policy discussions on changes in position between the Unitary Development Plan (UDP) and the emerging Local Development Plan (LDP), specifically on the removal of the Green Barrier designation. - The Council agreed that significant weight should be given to this policy amendment at the application stage, should the Inspector's Binding Report confirm the plan to be sound.
WCBC (PRoW)	Meeting and correspondence April 2023 and October 2023	<u>Public Rights of Way (PRoW)</u> - Engagement to confirm definitive routes of the PRoW and discuss diversion routes. - The proposal to move the footpath shown on the definitive map, onto a more suitable and walked alignment was agreed in principle subject to agreement on the width, any surfacing requirements and any limitations required such as gates.
Welsh Government (Strategic Road Network Division)	Email correspondence: 9 August 2023	Clarification from the Welsh Government on the status of the A483 J4 scheme, confirming the Roads Review Panel recommended in February 2023 that this scheme should not be progressed as the case for change was not well aligned with the Welsh Government's aim to reduce car milage. An alternative scheme has however been included in the Welsh Government's National Transport Delivery Plan 2022 to 2027 which is the Wrexham A483 multi-modal corridor improvements and city centre connectivity. The Junction 4 improvements are therefore not being progressed any further.
WCBC (PRoW)	Meeting and correspondence April 2023 and October 2023	<u>Public Rights of Way (PRoW)</u> - Engagement to confirm definitive routes of the PRoW and discuss diversion routes. - The proposal to move the footpath shown on the definitive map, onto a more suitable and walked alignment was agreed in principle subject to agreement on the width, any surfacing requirements and any limitations required such as gates.
WCBC (Highways)	Meeting:	<u>Transport and Traffic</u> - Meeting to discuss the scoping for the Proposed Development. During the meeting it was agreed that a Transport Statement (TS) is sufficient, given the

	7 September 2023	scale of the Proposed Development, and that traffic modelling would not be required. It was additionally agreed by WCBC that the Construction Traffic Management Plan (CTMP) document will be the main control document for managing the construction traffic generated during the construction phase. It was also agreed that a Stage 1 Road Safety Audit (RSA) would also be carried out on the site access junctions prior to agreement.
NRW	Meeting: 8 September 2023	<u>Landscape and Visual</u> - Proposed Development update, including evolution in design including the Illustrative Landscape and Ecology Masterplan and mitigation including screening. - Discussed scope of assessment and confirmed NRW's interest is solely concerned with designated landscapes, and the visual impact on the AONB. - NRW advised that the LVIA should consider NRW GN46 guidance in respect of the use of LANDMAP.
WCBC (Arboriculture)	Email: 13 October 2023 and 16 November 2023	<u>Arboriculture</u> - Enquiry to check for the presence of any Tree Preservation Orders (TPOs) or Conservation Areas within the Site. - It was confirmed by email on the 16/11/2023 that one TPO (WMBC 2, 1975) and one Conservation Area (Bersham Conservation Area) are present within the Site boundary.
WCBC (Arboriculture)	Meeting: 8 September 2023	<u>Arboriculture</u> - Combined with the meeting on Landscape and Visual and Ecology, the meeting provided clarification on the comments in the Scoping Direction.
NRW (Ecology)	Meeting: 8 September 2023	<u>Ecology</u> - Combined with the meeting on Landscape and Visual and Arboriculture. NRW confirmed generally the approach was acceptable but that a GCN Licence would be required and that this should detail long-term management and monitoring for both existing and new habitats, including mechanisms for ensuring delivery. [Note: A previous meeting to discuss the scope of the surveys and assessments was held with the NRW Development Advice Service 13th May 2021]
WCBC (Ecology officer)	Meeting: 1 September 2023	<u>Ecology</u> - Proposed Development update, including evolution in design, surveys and assessments. No issues in relation to ecology were raised.

Clwyd-Powys Archaeological Trust (CPAT)	Email correspondence: May 2023	Historic Environment & Archaeology - Presented the results of the geophysical survey. CPAT advised that development should be excluded from Area 14, which includes archaeological features 2 and 3 and possible archaeological features 4 and 6 to allow for their preservation in situ. Area 14 has been removed from the Proposed Development – these features will be preserved in situ.
CPAT	Email correspondence: 20 June 2023	Historic Environment & Archaeology - Response to the non-statutory consultation confirming feedback to date and recommending the parcel north of the A525 is included in the DBA, walkover and geophysical survey. Initial feedback was provided on the geophysical survey results for the parcel to the south of the A525 identifying areas which will likely require pre-determination targeted evaluation trenching.
CPAT	Email correspondence: September 2023	Historic Environment & Archaeology - CPAT advised that trial trenching would be required to test geophysical anomalies categorized as 'Uncertain'. - The scope of trial trenching has been discussed with CPAT and a Written Scheme of Investigation (WSI) was submitted to CPAT for agreement (February 2024), with trial trenching timetabled for March 2024.
Cadw	Email: October – November 2023	Historic Environment & Archaeology - Cadw confirmed that if the grid connection did not pass through a scheduled area Scheduled Monument Consent (SMC) would not be required. Cadw advised that SMC might be required if the grid connection were to be routed under the Scheduled Monument using Horizontal Directional Drilling (HDD) and that an SMC Application should be lodged with sufficient information to determine if SMC is required. - A draft SMC application will be submitted with the application.
North Wales Fire & Rescue	Meeting: 19 October 2023	BESS Safety - Introduction to the Proposed Development, the proposed design, safety requirements, and proposed outline Battery Safety Management Plan.
WCBC (Planning Department)	Meeting: 22 April 2024	General - Proposed Development update, providing an overview of the pre-application consultation and feedback, actions and forward programme to submission. Agreed the Statement of Common Ground progressed after the LIR has been prepared.

3.21 Further details on the non-statutory engagement with specialist consultees is provided in the Planning Statement and Environmental Statement.

Community council engagement

3.22 In addition to the pre-application non-statutory consultation (2021 and 2023) and statutory consultation (2024), Lightsource bp have engaged with the host community councils and councillors, including the community councils of Coedpoeth and Esclusham as follows:

Esclusham Community Council – Meeting on 11/12/23

3.23 Lightsource bp joined a community council meeting on 11/12/23 chaired by Councillor Mark Pritchard. Lightsource bp provided an overview of the consultation and feedback received between 12 June 2023 and 27 July 2023, changes to the Proposed Development in response to the consultation, further engagement and environmental assessments; and the draft programme to submission of the application including future pre-application consultation. Following the presentation there was an opportunity for questions and answers. The key concerns related to battery safety and the cumulative impact with other developments proposed in the area.

Further engagement with the Community Councils

3.24 Both Anthony Wedlake and Krista Childs attended the joint meeting with residents on from the Coedpoeth ward on 3rd December 2024, as detailed below.

3.25 Lightsource bp have continued to engage with the community councils providing updates at key stages in the process, including a response to Coedpoeth Community Council's statutory pre-application consultation submission. Esclusham Community Council did not respond to the statutory pre-application consultation.

Resident engagement

3.26 On 27 June 2023 a meeting was arranged on-site with the some of the closest residents located to the north of the Site, close to the A525. The meeting was arranged following enquiries on the Proposed Development upon receipt of the newsletter sent 9 June 2023. The purpose of the meeting was to walk parts of the Site, provide further information on the Proposed Development and respond to queries. Key concerns raised included:

- Potential impact on residential amenity (including views from the properties);
- Access to the Site for construction and operation;
- Potential impact on PRoW and walked routes around the estate;
- Noise from the inverters and transformers; and
- Impacts on health and wellbeing.

3.27 Following the initial feedback received from these residents, Lightsource bp continued to engage with residents and local elected representatives including community councillors, ward councillors, MSs, and MPs, between the non-statutory and statutory consultations. Additional queries raised were responded to, and include the following:

- Consideration of alternative sites;
- Validity of the soil sampling as it was limited to the Grade 3a land only;
- Inclusion of Energy Storage as part of the Proposed Development;

- Flood risk, particularly along the A525 and to the north of the southern parcel;
- Impact on local biodiversity; and
- CCTV and concern it would intrude on personal privacy.

3.28 In response to the meeting and the issues raised on 27 June 2023 and subsequent engagement, Lightsource bp commissioned RPS Group to undertake a Residential Visual Amenity Assessment (RVAA) as appended to the **Environmental Statement** (Document ref. 4.3.23). The purpose of the RVAA is to understand whether there is potential for the Proposed Development to affect 'living conditions' or 'residential amenity'. Site surveys and assessments were undertaken at key, representative properties (including the property to the south of the Site), which informed revised Proposed Development to mitigate the potential residential amenity impact. These included further set-back to 150m from residential properties, and intervening landscape screening and habitat creation. The Proposed Development is presented and described in detail in **Chapter 3 Need and Alternatives** of **the Environmental Statement** (Document ref. 4.03).

3.29 In addition, a site visit to a nearby operational solar site (Hadley Solar Farm) was arranged for 17 August 2023 for the nearest residents, to aid understanding of the Proposed Development particular in terms of the visual impact, and potential screening opportunities, as well as understand the noise associated with inverters. This was followed up with sharing initial outputs from the noise assessments.

3.30 On 3 November 2023 a further meeting was held with a number of the residents to the north of the Site and south of the A525, together with the Coedpoeth Community Councillors (Anthony Wedlake and Krista Childs), Sam Rowlands MS, Ken Skates MS and Mark Isherwood MS. Simon Baynes MP was invited, but unable to attend on the day. The meeting was arranged by the residents to discuss the design and landscape proposals presented following the RVAA options; provide feedback; and to discuss further queries and concerns.

3.31 It was established in the meeting that the level of setback proposed was still of considerable concern to the residents. In continued dialogue with residents, Lightsource bp revised the design to minimise impacts further and presented two design options (Option 1 & Option 2) in December 2023. Option 1 included the entire removal of a field south of Home Farm. Option 2 included the partial removal of panels from fields to the north-west, north (south of Home Farm), and north-east of the southern parcel. Further detail on the options is provided in **Chapter 3 Need and Alternatives** of **the Environmental Statement** (Document ref. 4.03).

3.32 Following feedback and further engagement in December 2023, a hybrid between Options 1 and 2 was agreed including the removal all panels from the field directly south of the Home Farm properties (as per Option 1) and removal of and setting back, with landscaping, south of Foxes Hollow (as per Option 2).

3.33 As a result of these changes the resident group sent a letter of support for the Proposed Development (attached as **Appendix 4**) on the condition that the Proposed Development would not expand further.

3.34 At the statutory pre-application consultation in 2024 Lightsource bp met with residents whose properties adjoining the north of the north parcel, on Tan Llan. The residents were interested in the Proposed Development, in particular the visual effects it may have from their properties however recognised in principle, the benefits of the Proposed Development, in particular the opportunities for biodiversity enhancements and the

biodiversity area to the north-east. Lightsource bp commissioned RPS Group to visit the properties on 10 April 2024, to better understand the potential impact on residential visual amenity. RPS Group recommended additional screening to the north along the boundary north of the security fence, and additional tree planting in the biodiversity area to increase the screening of the Proposed Development. These changes have been incorporated into the Proposed Development and the Illustrative Landscape and Ecology Masterplan.

4. Statutory consultation – statutory consultees

4.1 Article 9 of the Order states that Lightsource bp must consult with Specialist consultees (Schedule 2 notices), Community Consultees and Relevant Persons (Schedule 1 notices). The statutory consultation on the Proposed Development launched on Tuesday 20 February 2024 and closed on Tuesday 9 April 2024, giving consultees 50 days (over the statutory 42 days) to respond to the consultation.

4.2 This chapter of the report details those identified as Schedule 1 and Schedule 2 consultees for the Proposed Development, why they were classified as such, and how they were consulted.

Specialist consultees

4.3 The Order requires consultation with 'specialist consultees', which are defined by reference to the categories set out in Schedule 5.

4.4 With reference to Schedule 5 of the Order and taking into account the parameters of the Proposed Development, the following organisations were identified as specialist consultees:

- The Health and Safety Executive
- Wrexham Council Planning Department
- Wrexham Council Highways
- North Wales Minerals and Waste Planning Service
- Transport for Wales
- Dwr Cymru Welsh Water
- Welsh Ministers – Transport Directorate
- NRW
- The Canal Rivers Trust
- CADW
- North Wales Fire & Rescue
- Green Glyndwr University Group Wales Ambulance Services NHS Trust
- Coal Authority

4.5 The specialist consultees received a Schedule 2 notice (Specialist Consultees) Notice (attached as **Appendix 5**), newsletter, and notification email (attached as **Appendix 6**) on 21 February 2024 and consultees were given until Tuesday 9 April 2024 to respond.

Community consultees

4.6 Article 2 of the Order defines the Community Consultees as:

a) Each county or county borough councillor representing an electoral ward in which the land to which the proposed application relates is situated; and

b) Each community council in whose area the land to which the proposed application relates is situated.

4.7 The Site is located in WCBC and within Coedpoeth Community Council and Esclusham Community Council. The following were identified as community consultees:

Name	Representing
Cllr Krista Childs & Cllr Anthony Wedlake	Coedpoeth Ward
Cllr Mark Pritchard	Esclusham Ward
Cllr Paul Pemberton	Ponciau Ward*
Cllr Fred Roberts	Rhos Ward*
Vicky Bolton	Coedpoeth Community Council
Bryn Jones	Esclusham Community Council

NOTE : * Cllr Paul Pemberton, local member for Ponciau ward and Cllr Fred Roberts, local ward member for Rhos were included in the list of community consultees as the cable route options crossed these wards.

4.8 The above community consultees received a Schedule 1 Statutory Notice under articles 8 and 9(2) (attached as **Appendix 7**), a newsletter and notification email (attached as **Appendix 8**) on 21 February 2024 and consultees were given until Tuesday 9 April 2024 to respond.

Relevant persons

4.9 Article 9 of the Order requires that 'relevant persons' be consulted through the statutory pre-application consultation process. Relevant persons are those who would be responsible for determining any secondary consents that are made with the application for the Proposed Development.

4.10 The following were identified as relevant persons:

Organisation	Reason for being a relevant person
Cadw	Scheduled Monument Consent (SMC) under S.2(2) of the Ancient Monuments and Archaeological Areas Act 1979 (control of works affecting scheduled monuments)
Welsh Government	Stopping up and diversion of Public Rights of Way under S.247 of the Town and Country Planning Act 1990

4.11 The above relevant persons received a Schedule 1 Statutory Notice under articles 8 and 9 (2) (attached as **Appendix 7**), a newsletter and notification email (attached as **Appendix 9**) on 22 February 2024 and consultees were given until Tuesday 9 April

2024 to respond. . A **Schedule of Secondary Consents** is provided with the Application (Document ref. 3.0.11).

Adjoining owner / occupiers

4.12 As required under Article 8(1)(a)(ii) of the Order, letters and statutory notices were sent out to owners or occupiers of land adjoining the land to which the Proposed Development relates.

4.13 A total of 76 adjoining owner / occupiers were identified on land adjoining the Site to comply with Article 11(2)(c) (attached as **Appendix 10: Adjoining owners/occupiers mailing list).**

4.14 The above adjoining owners / occupiers received a Schedule 1 Statutory Notice under articles 8 and 9(2) (attached as **Appendix 7**), a newsletter and notification letter (attached as **Appendix 11**) on 22 February 2024 and consultees were given until Tuesday 9 April 2024 to respond.

Non-statutory consultees

4.15 The following Members of the Senedd and Parliament were informed about the consultation and received a newsletter due to their and their constituent's interest:

- Simon Baynes MP (Clwyd South Constituency MS)
- Ken Skates MS (Clwyd South Constituency MS)
- Sam Rowlands MS (North Wales – Regional MS)
- Llyr Gruffydd MS (North Wales – Regional MS)
- Mark Isherwood MS (North Wales – Regional MS)
- Carolyn Thomas MS (North Wales – Regional MS)
- Sarah Atherton MP (Wrexham)

4.16 Following an in-depth stakeholder mapping exercise and residents signing up to project updates, 113 stakeholders received a notification email and newsletter on the launch of the statutory consultation on 22 February 2022. A list of non-statutory stakeholders is attached as **Appendix 12**. These included key organisations such as:

- British Trust for Ornithology – Wales
- RSPB Cymru – North Wales
- Offa's Dyke Association
- Farmers' Union Wales – Denbigh & Flint
- Campaign to Protect Rural Wales – Clwyd
- Groundwork North Wales Training Centre
- North East Wales Biodiversity Network
- Coedpoeth Youth Centre
- RenewableUK Cymru
- Cynnal Cymru (Sustain Wales)

5. Statutory publicity

5.1 The statutory consultation on the Proposed Development took place between Tuesday 20 February 2024 and Tuesday 9 April 2024.

5.2 Section 61Z(3) of the Act requires Lightsource bp to publicise any Proposed Development in any such manner as Lightsource bp reasonably considers likely to bring it to the attention of a majority of the persons who own or occupy premises in the vicinity of the land. The publicity must:

- Set out how Lightsource bp may be contacted by persons wishing to comment on the Proposed Development; and
- Give such information about the proposed timetable for the consultation as is sufficient to ensure that persons wishing to comment on the Proposed Development may do so in good time.

5.3 In this case, Lightsource bp advertised a consultation period running from Tuesday 20 February 2024 and Tuesday 9 April 2024. The formal consultation lasted for 50 days.

5.4 In accordance with Article 8 of the Order Lightsource bp:

• Displayed 13 bilingual site notices on or near the Site from Tuesday 20 February 2024 for a minimum of 42 days (see paragraphs 5.5 to 5.6 below).

• Served written notice on owners or occupiers of land adjoining the Site (see Paragraph 4.12 – 4.14 above).

• Published all documents on the project website for a period of not less than 42 days (see paragraphs 5.5 to 5.8 below).

• Published a bilingual notice in the Daily Post Wales West on Wednesday 21 February 2024 (see paragraphs Section 5.10 to 5.11 below).

Site notices

5.5 In accordance with Section 8(1)(a)(i) of the Order, which requires the display of a site notice in at least one place on or near the land to which the Proposed Development relates, thirteen site notices and posters were put up on Tuesday 20 February 2024 and were taken down after the close of consultation, from Tuesday 9 April 2024.

5.6 A copy of the bilingual site notice is attached as **Appendix 13** and a map showing the locations the site notices and evidence of their display is provided in **Appendix 14**. The site notices were checked on a bi-weekly basis to ensure that they were erected throughout the consultation period in light of Article 8(4) of the Order.

Published documents

5.7 As required under Article 8(1)(b) of the Order, a bilingual website was set up in 2023 for the non-statutory consultation to provide information about the Site, Proposed Development, an interactive Site map, the draft planning application, feedback mechanisms and contact details so local residents and stakeholders could find out more

and comment on the Proposed Development as it developed: https://lightsourcebp.com/uk/project/plas-power/.

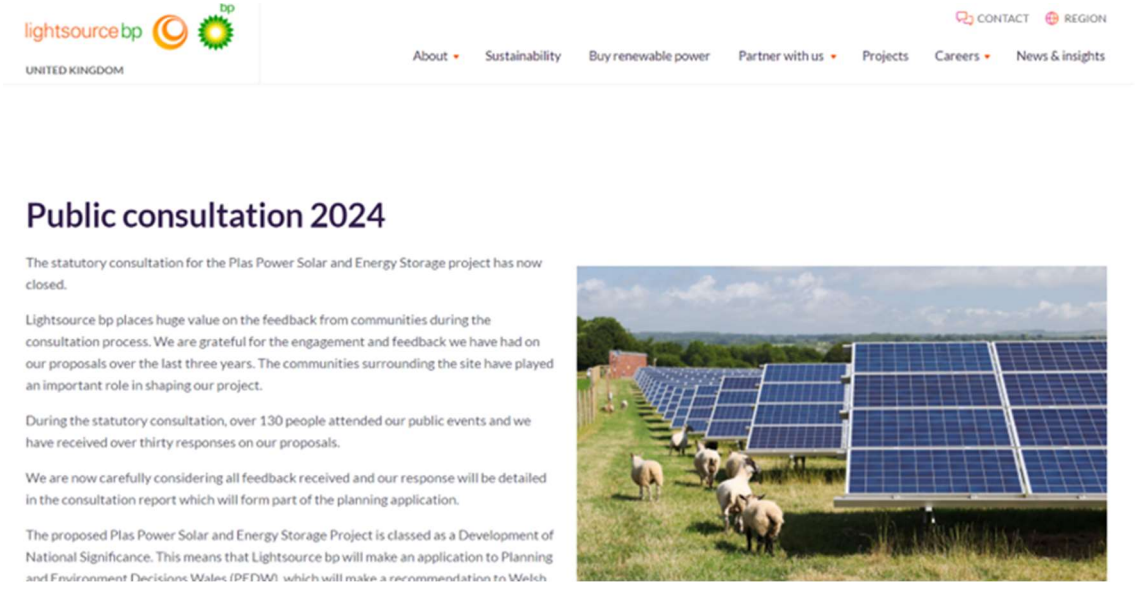
5.8 On the launch of the statutory consultation on Tuesday 20 February 2024 the website was updated with the information about the Proposed Development including the application form, supporting documents and relevant notices were available for download during the statutory consultation period (and remained available after the close of consultation). A list of all the planning documents that were available to view on the website is attached as **Appendix 15**.

5.9 As well as hosting the draft planning application and virtual exhibition, it also encouraged respondents to feedback with comments using the online feedback form, email address or telephone number.





5.10 546 visitors were recorded as visiting the website during the statutory consultation, 518 to the English version and 28 to the Welsh version. Due to privacy consent settings, the actual number may be higher.



Statutory press notice and advertising

Statutory notice in local press

5.11 In accordance with Article 8(1)(a)(iii) of the Order, a bilingual notice was published in the local paper Daily Post Wales West, which covers the locality of the Site, on Wednesday 21 February 2024 (attached as **Appendix 7**).

5.12 An advert promoting the public exhibitions was placed in the Daily Post Wales West, which covers the locality of the Site, on Wednesday 21 February 2024 (attached as **Appendix 16**).

Other publicity

5.13 This section provides a summary of the communications and engagement activity during statutory consultation. A variety of consultation tools and communication channels were used to encourage participation in the consultation and ensure the consultation was as inclusive as possible for stakeholders and the local community.

Newsletter

5.14 A bilingual newsletter giving an update on the Proposed Development was posted to properties within the consultation zone and emailed to identified stakeholders (including elected representatives, community, and interest groups. The justification for this consultation zone is explained in paragraph 2.27 above.

5.15 The newsletter gave an overview of the Site, the Proposed Development, feedback mechanisms and contact details (attached as **Appendix 17**).

Feedback form

5.16 An online feedback form was produced to gather feedback during the statutory consultation. This was made available on the project website at the start of the consultation. This was available in English or Welsh.

5.17 Hard copies were available at the face-to-face events and returned to the project team using the Grasshopper Freepost address.

5.18 A copy of the feedback form is attached as **Appendix 18.**

Statutory consultation brochure

5.19 A consultation summary brochure was produced that included details for the Proposed Development, events, changes to the Proposed Development, environmental considerations, timeline, feedback mechanisms and contact information. This was available in both Welsh and English and enabled community members to engage easily in the process.

5.20 This was made available on the website, as well as in hard copy at drop-in events, key community venues and was available to send to people with no digital access, to enable them to understand the Proposed Development and respond to the consultation. A copy of the consultation brochure is attached as **Appendix 19.**

Press release

5.21 A press release was sent to local media to inform the public about the statutory consultation and invite them to the consultation events. A subsequent was release was sent to inform them that the consultation had closed (these are attached as **Appendix 20**).

5.22 Coverage included:

Date	Publication	Headline and link
26/02/24	Wrexham.com	Plas Power Solar and Energy Storage Project begins statutory consultation
1/03/24	Place North West	Major Wrexham solar farm plans out to consultation
27/02/24	The Leader	Wrexham: Consultation for major solar energy project
09/04/24	Business News Wales	Lightsource BP Thank Local Communities for Their Engagement and Feedback
19/04/24	Wrexham.com	New solar farm project planned in Wrexham could power over 22,000 homes

Advertising

5.23 The following tools were used to ensure the wider public, who didn't receive the newsletter, were informed about the emerging Proposed Development and had an opportunity to participate.

- **Newspaper advert** - An advert was placed in the Daily post Wednesday 21 February 2024 on page 15 to advertise the public exhibitions (attached as **Appendix 21**).
- **Social media toolkit -** A social media toolkit was prepared to help raise awareness of the Proposed Development and publicise the consultation events and how to give feedback. It was issued to the consultation venues and key stakeholders with local social media pages, unfortunately none of these published the social media toolkit (attached as **Appendix 22**).

Drop in events

5.24 Following the non-statutory consultation, it was decided to host two drop-in events at the Plas Pentwyn Community Centre and Rhostyllen Parish Hall. The centre is well used by the local community with a busy café, library and various groups meeting during the event.

5.25 The following drop in events took place:

Date	Time	Venue	Attendees
Wednesday 13 March 2024	12pm to 4pm	Plas Pentwyn Community Centre, Castle Road, Coedpoeth, LL11 3NU	48
Thursday 14 March 2024	9.30am to 1pm	Plas Pentwyn Community Centre, Castle Road, Coedpoeth, LL11 3NU	36
Thursday 14 March 2024	2.30pm to 6.30pm	Rhostyllen Parish Hall, Vicarage Hill, Rhostyllen, LL14 4AR	47

5.26 These venues were chosen because they had activities taking place at the venue, disabled access, had good public transport links, parking onsite, were central to the community, close to the Site and suggested by the local community councils at Coedpoeth and Esclusham.

5.27 There were eight bilingual exhibition boards with the following information:

- Welcome – introducing the Site, benefits for the renewable energy and key facts about the Proposed Development.
- Updated Proposed Development – setting out the changes to the Proposed Development since the non-statutory consultation.
- Design Evolution - explaining the evolution of the design and the Proposed Development plan.
- Latest Proposed Development – large scale Proposed Development plan.
- Environmental considerations - including biodiversity, cultural change, hydrology and hydrogeology, landscape and visual impact, agriculture and soils, climate change.
- Our project timeline – explaining about the planning process and indicative timeframes.
- How solar panels and energy storage work – and the positive impacts of both
- Community Benefits – setting out potential opportunities for community benefits and feedback mechanisms.

5.28 The boards were produced and displayed in English and Welsh at each of the venues and were available to download as a PDF from the project website. The exhibition boards are attached as **Appendix 23**.

5.29 Feedback forms, fact sheets, newsletters and consultation brochures were available at the events to give attendees.

5.30 In addition to asking attendees to provide feedback, the project team engaged in a number of conversations during the consultation events. Key themes of feedback collected conversationally at the events included;

- General support for solar energy.
- Support for the changes made to the Proposed Development between non-statutory and statutory consultation.
- Preference for solar development over residential.
- Support for the biodiversity improvements.
- Concerns about the safety of BESS.
- Understanding that the Site was well contained, providing visual screening.
- Concerns that the Proposed Development will impact traffic.

Other targeted engagement:

Stakeholder update briefings/meetings

5.31 Following the non-statutory engagement in 2023, meetings were held with the following stakeholders:

- **Sam Rowlands MS 05/09/2023**
- **Mark Isherwood MS 02/10/2023**
- **Ken Skates MS 07/09/2023**
- **Simon Baynes MP 06/09/2023**

5.32 The meetings were held in English but included a bilingual presentation. The purpose of the meetings was to provide an update on the Proposed Development; an overview of consultation and feedback; and next steps and an indicative timeframe for submission of the application.

5.33 Following the update briefings / meetings, Lightsource bp continued to engage on particular issues, including the meeting with local residents as detailed above.

6. Declaration of compliance with Act/Order

6.1 Under Article 11(2)(e) a declaration that Lightsource bp has complied with the publication requirements in article 8(1)(b) is required:

(b) *publishing the following information on a website maintained by the applicant, for not less than 42 days beginning with each day on which each of the notices referred to in subparagraph (a) or article 9(2) are given -*

(i) the draft application form published by the Welsh Ministers under article 12(1)(a) (or a form substantially to the like effect), including the particulars specified in or referred to in the form;

(ii) a plan which identifies the land to which the proposed application relates;

(iii) any other plans, drawings and information necessary to describe the development which is the subject of the proposed application;

(iv) a copy of the notice required by article 6 which has not lapsed under paragraph (3) of that article;

(v) the design and access statement required by article 14;

(vi) subject to article 12(3), the particulars or evidence required by the Welsh Ministers under section 62(3) of the 1990 Act (applications for planning permission);

(vii) where applicable, a statement referred to as the environmental statement for the proposed development;

(viii) a written statement about any secondary consent connected with the proposed application M3 in respect of which the applicant considers a decision on that consent is to be made or should be made by the Welsh Ministers, together with the draft application form and documents associated with such consents; and

(ix) in the case of development within regulation 3(1)(ab) of the Criteria Regulations, a written statement about the length of the proposed line and its nominal voltage

6.2 **Appendix 24** sets out Lightsource bp's Declaration of Compliance with Act/Order.

7. Number of responses - by type

7.1 This section details the number of responses received during the statutory consultation period.

Specialist consultee responses

7.2 Responses were provided by the following specialist consultees who received a Schedule 2 notice (refer to **Appendix 25: Copy of the specialist consultee responses**):

Organisation name	Date
CADW	3 April 2024
Canal and River Trust	4 March 2024
Coal Authority	19 March 2024
Dŵr Cymru	11 March 2024
HSE	27 February 2024
North Wales Fire and Rescue Service	15 March 2024
NRW	4 April 2024

7.3 The following specialist consultees did not respond to the statutory consultation:

- Wrexham Council Planning Department
- Wrexham Council Highways
- North Wales Minerals and Waste Planning Service
- Transport for Wales
- Welsh Ministers – Transport Directorate
- Green Glyndwr University Group Wales Ambulance Services NHS Trust

Community consultees responses

7.4 Responses were provided by the following community consultees who received a Schedule 1 notice (refer to **Appendix 26: Copy of the community consultee responses**):

Name	Representing	Date
Cllr Anthony Wedlake	Coedpoeth Ward	09 April 2024
Vicky Bolton	Coedpoeth Community Council	09 April 2024

7.5 The following community consultees did not respond to the consultation:

Name	Representing
Cllr Krista Childs	Coedpoeth Ward

Cllr Mark Pritchard	Esclusham Ward
Cllr Paul Pemberton	Ponciau Ward
Cllr Fred Roberts	Rhos Ward
Bryn Jones	Esclusham Community Council

Relevant person responses

7.6 Responses were provided by the following relevant persons who received a Schedule 1 notice:

- Cadw (response included under specialist consultees in paragraph 7.2)

Adjoining owner and occupier responses

7.7 Responses were provided by the following landowners who received a Schedule 1 notice:

Name	Date	Details
Myra Ryan	09 April 2024	Completion of a feedback form – reference 0008808
The Woodland Trust	09 April 2024	Response attached as **Appendix 27.**

Enquiries during the statutory consultation

7.8 A total of 20 emails enquiries were received during the statutory consultation with:

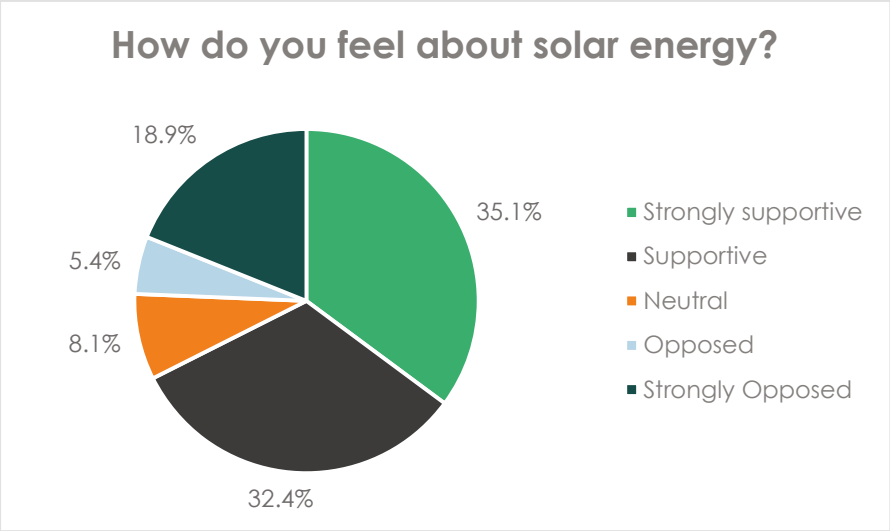
- 7 emails giving feedback on consultation from specialist consultees
- 7 emails feedback on consultation from other stakeholders
- 3 emails with queries on the Proposed Development
- 2 emails enquiries about organising stakeholder meetings
- 1 enquiry about consultation organisation

Feedback forms

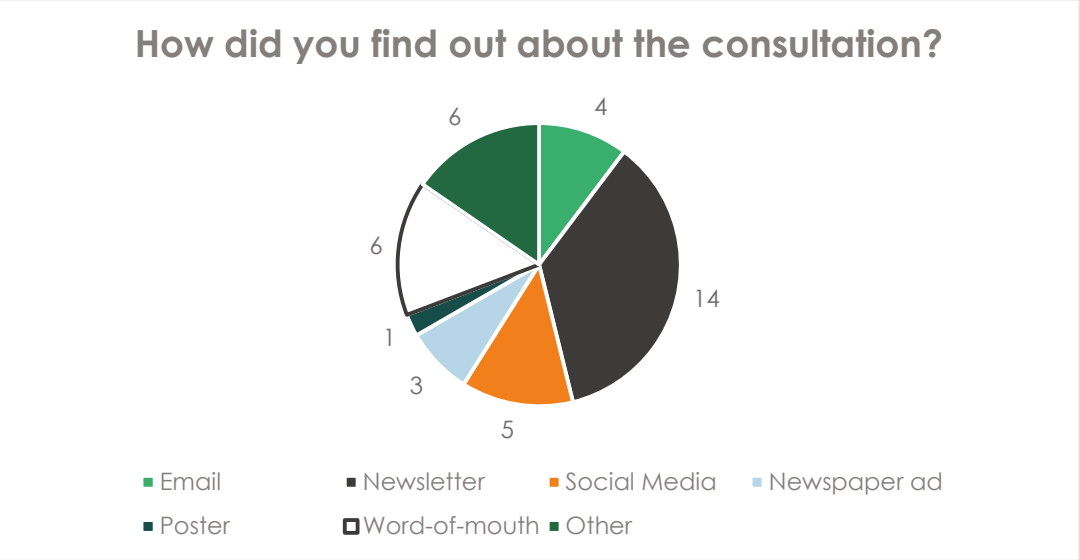
7.9 During the statutory consultation, 37 feedback forms were completed online or returned using the freepost address. Copies of these feedback forms are attached as **Appendix 28**.

Summary of feedback

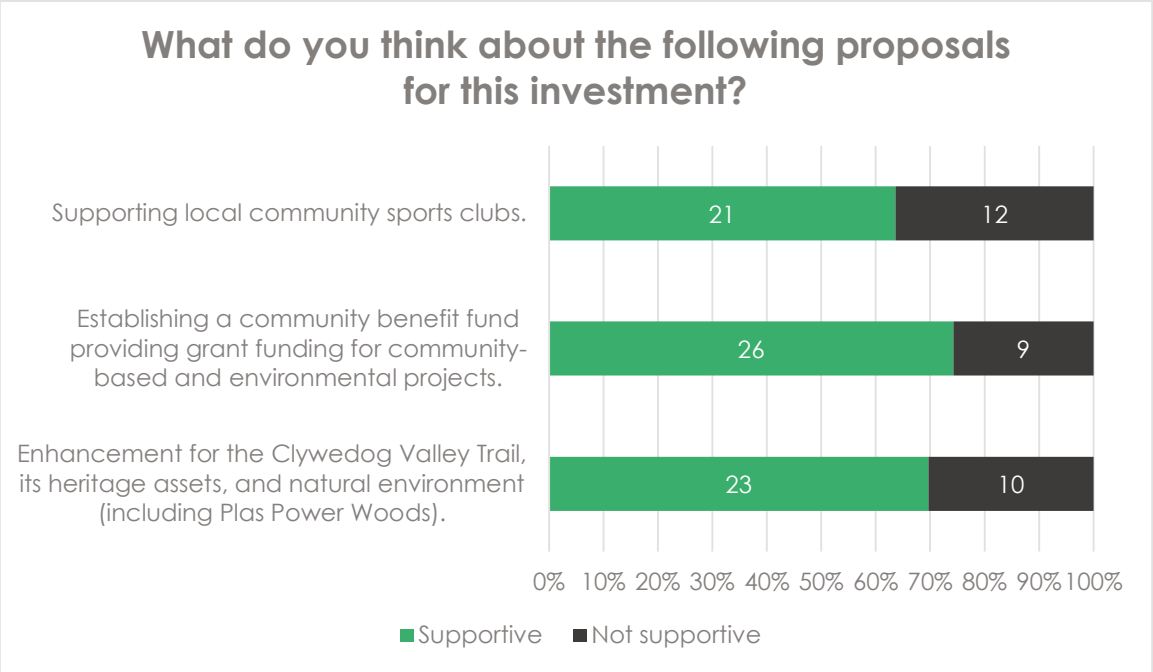
7.10 Of those who responded to the question asking: '**How do you feel about solar energy?**; over 65% were strongly supportive or supportive with 5.4% opposed and 18.9% strongly opposed.



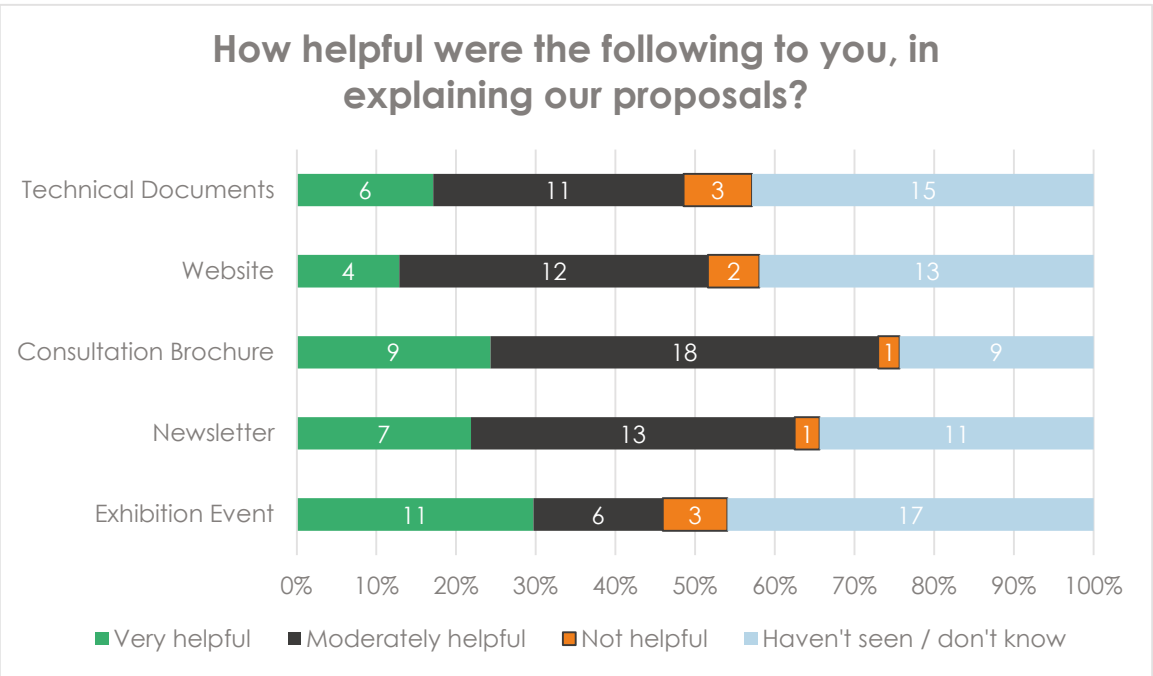
7.11 Of those who responded to the question asking: '**How did you find out about the consultation?**; over 40% of the respondents found out about the event from the newsletter and 17% found out about if by word of mouth.



7.12 Of those who responded to the question asking: '**What do you think about the following proposals for this investment?**; 75% of those responding to the question were supportive of a community benefit fund. By reference to specific initiatives, nearly 70% were supportive of the enhancements to the Clywedog Valley Trail and over 60% were supportive of supporting local community sports clubs.



7.13 Of those who responded to the question asking: '**How helpful were the following to you, in explaining our proposals?**; nearly half the respondents found the information helpful, in particular 75% found the consultation brochure useful. Nearly half of those responding to the survey had not been to an exhibition event.



8. Responses from statutory consultees and consequent actions

Specialist consultee responses

8.1 This section of the report sets out a summary of the responses received from specialist consultees (the full response can be found in **Appendix 25**), and statutory consultees and consequent actions undertaken by Lightsource bp.

8.2 Responses were provided by the following specialist consultees:

	Consultee Responses	Lightsource bp response
Cadw[2]	**Assessment** The application will be accompanied by an environmental statement produced by RPS: However, it is noted that Chapter 7 Cultural Heritage of this document is incomplete, as the results of an evaluation of potential archaeological features, identified by geophysical survey, has not been included in it. It is possible that these archaeological features could be of national importance. Chapter 7 will therefore need to be completed following the completion of the archaeological evaluation before the application for the development is submitted.	**Archaeological evaluation** The results of an evaluation of potential archaeological features, identified by geophysical survey, was not included in the consultation version of the Environmental Statement, however, the consultation version Environmental Statement did confirm that a scheme of evaluation was underway, the results of which would inform the final submission version of the ES. The results of the scheme of evaluation have confirmed that there are no significant archaeological finds, and the submission version of the Environmental Statement has been updated to confirm this. On the 23 April 2024 a confirmatory letter was issued to CADW confirming that the

[2] Comments were made as a specialist consultee and as a relevant person

	The cable route connecting the solar farm with the Legacy Substation has not been confirmed with two routes currently being proposed. If the southern route is chosen, than it will have to cross scheduled monument DE132 Offa's Dyke: Cadwgan Hall Section, extending from River Clywedog to the Railway. It is currently proposed to make this crossing by the use of horizontal directional drilling. Whilst the intention of using this method to cross the scheduled monument is not to have a direct impact on it, scheduled monument consent will need to be granted before this can be carried out. The applicants will have to decide whether the scheduled monument consent will be applied for as a secondary consent to the main application, or as a standalone application. In either case, it is strongly recommended that Cadw are consulted before the application is submitted, in order to ensure that all relevant information is provided thereby avoiding delays in the determination of the application. Chapter 7 Cultural Heritage of the environmental statement considers the impact of the proposed development on the settings of the above designated historic assets and concludes that there will not be any significant impact. We concur with this conclusion.	trenching had been completed, in line with the WSI agreed with CPAT, and that the geophysical anomalies for the most part were geological rather than archaeological in origin, though a small number of undated linear features and a posthole were recorded. It was also confirmed that none of the features encountered are considered to be of national importance. **<u>Scheduled Monument Consent</u>** The intention is to apply for Scheduled Monument Consent (SMC) as a secondary consent of the DNS application so that in the event that Cable Route Option 1 is pursued, the necessary consents will be in place to allow the construction of the Proposed Development to commence. Engagement with Cadw in respect of the draft SMC has taken place to ensure that all relevant information is provided at the point of submission of the DNS application, thereby avoiding delays in the determination of the application. Two cable route options which cross Offa's Dyke Scheduled Ancient Monument are being considered and included within the planning application for the Proposed Development, this is due to development of the design at this stage and the potential for further constraints to be present in the road that are not be fully understood at this point in time. There is a degree of uncertainty surrounding the existing roads capacity in the area that crosses Offa's Dyke to accommodate the cable route alongside existing and proposed utility infrastructure that may come forward prior to construction of the Proposed Development. Whilst the option to place the cable within the road at the point the cable route crosses with Offa's Dyke is the preferred option, the application will retain flexibility in case this option is not feasible. This feasibility to

		cable through within the road at the location Offa's Dyke is crossed will be determined when the design has developed further. As stated in the Environmental statement, potential impacts on the scheduled Offa's Dyke (DE132 & DE194) where its line may be crossed by the proposed grid connection will be avoided either by routing the grid connection along an existing road and hence existing break in the dyke or the use of horizontal directional drilling (HDD). Should the latter option be selected, a geophysical survey will be undertaken to establish the depth of the archaeological features and HDD used to insert the cable at sufficient depth under the Scheduled Monument to prevent any direct or indirect disturbance. There will consequently be no impact on the physical fabric of the scheduled Offa's Dyke.
Canal Rivers Trust	Thank you for your consultation on the Plas Power Solar & Energy Storage Project at land Ruthin Road, having reviewed the details we can confirm that the Canal & River Trust have no comments to make on the project. We do not own or manage any assets or infrastructure that would be impacted by the development. We do not need to receive any further consultations on this project as the scheme progresses.	Noted, no response required.
Coal Authority	The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. Our records indicate that the site is in an area where coal has been removed by surface mining methods. In light of	**<u>Coal Mining Risk Assessment</u>** The Coal Mining Risk Assessment will be included within the Environmental Statement (ES) as Appendix 4.8 and is part of the DNS planning application to PEDW (Document ref. 4.3.16).

	this we are pleased to see the inclusion in Appendix 4.8 of the Environmental Statement a Coal Mining Risk Assessment, dated February 2024 and prepared by RPS Group. This Risk Assessment makes an assessment of the coal mining legacy features recorded to be present in the areas of interest and provides conclusions based on these findings. We note that the report authors conclude that overall, the risks are low but that in areas of backfill it may be moderate, and measures are proposed to address this risk. Any formal submission made for this project should be supported by this Coal Mining Risk Assessment within the appendices.	
Dŵr Cymru Welsh Water	**Asset Protection** The proposed development site is crossed by public sewers at grid reference 329377.16, 350897.33 and 330721.27, 349192.94, with the approximate positions being marked on the attached Statutory Public Sewer Record. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. No part of any building will be permitted within 3 metres either side of the centreline of the 100mm and 150mm public sewer. Our strong recommendation is that your site layout takes into account the location of the assets crossing the site and should be referred to in any master-planning exercises or site layout plans submitted as part of any subsequent	**Asset Protection** Lightsource bp have reviewed the sewer plans within the proximity to the Proposed Development, and confirm that the foul sewer network intersects the red line boundary in two locations as follows: - Grid Reference (Easting, Northing) - (329395, 350906). There is a small overlap within the southwestern part of biodiversity Area 1, this area will not contain any permanent buildings and will comprise a wild flower meadow, tussocky grassland, wild bird seed crop, native tree and shrub planting, pond creation, hedgerow re-enforcement and invertebrate banks. There will be no conflict with the existing sewer network in this location. - Grid Reference (330687, 349206). The existing sewage network crosses the redline boundary within the unnamed

	planning application. Further information regarding Asset Protection is provided in the attached Advice & Guidance note. **Sewerage** We note that the applicant doesn't propose to connect to the public sewerage network and therefore offer no comments regarding sewerage or sewerage treatment. **Water Catchment** This planning application falls within a Drinking Water Protected Area under article 7 of the Water Framework Directive. This article requires the UK to take action to protect drinking water sources. Section 7.3 states that the aim is 'to avoid deterioration in water quality where this may lead to additional purification treatment being required'. The proposed development falls within the DCWW Drinking Water Catchment known as River Dee. The site is approximately 38km from the River Dee at Poulton Chester abstraction point. The River Clywedog is located approximately 45m south of the site, this flows in an easterly direction and feeds into the River Dee approximately 30km South East. We acknowledge the mitigation measures and hydrological effects listed as part of the Proposed Development. As stated, the risk of water pollution and sedimentation will primarily originate from the construction phase e.g. water runoff contaminated by machinery, fuel storage or heavy	road where the cable route alignment that connects the Proposed Development to the legacy substation is proposed. Although the design of the cable route is not detailed at this stage, the proposed cable route will consider the location of the sewage main and any other existing utilities within the road network ensuring that protective provision is put in place and no conflicts occur. No above ground infrastructure will be present along the cable route and any excavations will be re-instated to their previous condition. **Sewerage** The Proposed Development will not be connected to the public sewerage system. **Construction Environmental Management Plan (CEMP)** The Outline Construction Environmental Management Plan (CEMP) sets out pollution control measures which will be implemented during the construction phase of the Proposed Development to ensure that there is no deterioration in water quality experienced as a result of the construction of the Proposed Development. It is anticipated that a detailed CEMP will be required by condition of the permission which will be submitted to the Local Planning Authority for approval ahead of construction of the Proposed Development commencing. The detailed CEMP will provide more detailed pollution prevention measures. **Pollution Prevention** The Landscape and Ecology Management Plan (LEMP) contains a detailed specification for the management of the use of pesticides and any vegetation clearance works on site during construction and operation of the Proposed Development. Section 'I' of the LEMP controls the use of

	vehicles parked on site. However, we request that all incidents relating to pollution of any kind be reported to DCWW Smart hub as soon as it is safe to do so on 0303 313 0103. We also request further information on the following matters: - Plans relating to pesticides use and vegetation removal during construction and the project lifetime - PFA risk assessment to drinking water due to use in solar panel components and rechargeable batteries, this should include type/manufacturer and components of the solar PV arrays. - Full pollution prevention and incident management plan. I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.	chemicals and will be provided to all contractors for review at site briefings. Regarding the request for a full pollution prevention and incident management plan, details of pollution prevention and incident management is contained within the outline Construction Environmental Management Plan (CEMP) (**Environmental Statement** Appendix 2.2 (Document ref. 4.3.06)) and outline Battery Safety Management Plan (BSMP) (**Environmental Statement** Appendix 2.1 (Document ref. 4.3.05). It is anticipated that a planning condition will be imposed on any planning consent which will require a detailed CEMP and BSMP to be produced and submitted to the Local Planning Authority for approval ahead of construction commencing which will contain further, more detailed information. PFA is not typically used in the manufacturing of panels, or the panels we use on our sites. There is the potential that PFAs may be used in Battery Energy Storage Systems, however with proper management and maintenance, there should be no risk to the environment. For the proposals at Plas Power, additional layers of protection are built in, including an impermeable base which would capture any run off by the land, and will be managed by the proposed drainage infrastructure including swales.

HSE	**<u>HSE's land use planning advice:</u>** 1. With reference to Figure 1.1 Site Location Plan found in [Plas Power Solar and Energy Storage Project, 4.4 Environmental Statement, Volume 4: Non-Technical Summary, February 2024, DNS Ref: DNS/3253253] on which is shown a redlined site boundary, in the southernmost section of the proposed development site there is an area which falls within HSE public safety consultation zones associated with Major Accident Hazard Pipeline(s) operated by Wales & West Utilities: a. Maelor / Y Waen (VN080) W130 NEWales [HSE ref: 7606, Transco ref: 1859] - Wales and West Utilities 2. The redlined area does not currently fall within the consultation distances of any Major Accident Hazard Installation(s). 3. HSE will not advise against the proposed development, providing the proposed development does not introduce populations, either permanent or temporary, into any of HSE's public safety consultation zones which are assigned to individual Major Accident Hazard Pipeline(s). 4. Please note if at any time a new Major Accident Hazard Pipeline is introduced or existing Pipeline modified prior to the determination of a future application, the HSE reserves the right to revise its advice. 5. Likewise, if prior to the determination of a future application, a Hazardous Substances Consent is granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard	The HSE comments are noted.

	Installation in the vicinity of the proposed project, again the HSE reserves the right to revise its advice. **<u>Would Hazardous Substances Consent be needed?</u>** 6. The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) (Wales) Regulations 2015. 7. Hazardous Substances Consent would be required if the proposed development site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations. 8. Further information on HSC should be sought from the relevant Hazardous Substances Authority. **<u>Explosives Advice:</u>** Explosives Inspectorates response remains the same as previous response in June 2023: no comment to make in regard to this development as there are no HSE licenced explosive sites in the vicinity of the proposed development.	

North Wales Fire and Rescue Authority	The site plan/s of the above proposal has been examined and the Fire and Rescue Authority would wish the following comments to be brought to the attention of the planning committee/applicant. It is important that these matters are dealt with early on in any proposed development. • the Fire Authority has no objection to the proposed development and refers the Local Planning Authority to any current standing advice by the Fire Authority about the consultation. • If the proposed construction does go ahead the Fire and Rescue Service would look to do a familiarisation visit to the site when it is complete. The developer should consider the need to provide adequate water supplies and vehicle access for firefighting purposes on the site and general guidance on this matter is given in the attached Appendix and the following links: https://www.water.org.uk/guidance/national-guidance-document-on-the-provision-ofwater- for-firefighting-3rd-edition-jan-2007/ https://www.ukfrs.com/index.php/promos/16847 Furthermore, the applicant should be advised to contact the Local Authority Building Control Department, which is the responsible authority, when determining issues concerning means of warning and escape, internal fire spread (linings and structure), external fire	**Access:** The site has been designed to ensure suitable access is achievable throughout the site during both the construction phase and the operational phase of the Proposed Development. As shown on the Indicative Site Layout Plans (Document ref: 2.0.02 and 2.0.3), the following site accesses will be available: - Access 1: A new access will be constructed to the east along the A525 west of Heritage Way, which will serve as the main construction access point for the southern parcel of the site and will subsequently also be used as the main access for operation and maintenance site visits. - Access 2: The access to the northern parcel of the site (Access 2) will be via an existing farm access routing north off the A525. The existing access is currently used by large agricultural vehicles and would be suitable for HGVs with some improvements. - Access 3: Whilst Access 1 is being constructed, there will be a short-term temporary requirement to use Access 3 to access the site during construction set up and establishment. The existing Home Farm access (Access 3) will be used for maintenance access when the Proposed Development is operational if required. - Access 4: It is not proposed to use the access to the southern part of the site from the south along Rhos Berse Road (Access 4) during construction, operation or decommissioning, but may be needed in exceptional circumstances and will be limited to staff or emergency vehicular access only, and would be limited to cars and LGVs. **Water Supply and Management of Fire Water** Following pre-application consultation, some minor changes have been made to the Proposed Development: • Update to **Environmental Statement** Appendix 8.1: Flood

	spread, access and facilities for the Fire and Rescue Service, in accordance with the 2007 version of Approved Document B (Wales).	Consequences Assessment (FCA) & Conceptual Drainage Strategy (Document ref. 4.3.37)) to include some further clarification on how fire water will be managed in the unlikely event of a fire. Further detail can be found within this document included within the planning application but to summarise, the drainage design associated with the energy storage site has allowed capacity for fire water to be captured and cycled for re-use in the event of a fire. This has been managed by lining and appropriately sizing the attenuation pond downstream of the energy storage site that will be controlled via a pen-stock valve. This will allow fire water to be captured and prevented from entering the local surface waterbodies and or groundwater if any form of contamination has occurred. • An additional gate and access to the energy storage site has been included to align with the NFCC battery safety guidelines, the second access should only be used if the primary access to the energy storage site is unfeasible. This change is shown on the updated indicative site layout included within the application. • Following previous discussions the NWFRS informed that the closest fire hydrant to the energy storage facility is owned and operated by Hafern Dyfrdwy, since this an email has been sent through to their get in touch service to make them aware of the proposals and the potential use of this hydrant in the unlikely event of a fire on site, and although no response has yet been received communication is anticipated to continue as the design progresses.

Natural Resources Wales	We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding protected species, protected sites, pollution prevention and designated landscape. If this information is not provided, we may object to the planning application when formally consulted by the planning authority. Further details are provided below. Protected Species *Great Crested Newts (GCN)* We note that the Environmental Statement (ES) and supporting information has identified Great Crested Newts (GCN) to be material to the application site. GCN and their breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and Schedule 5 of the Wildlife and Countryside Act 1981. Where GCN are present and a development proposal is likely to contravene the legal protection, they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if: i. The development works to be authorised are for the purpose of preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment;	**<u>Great Crested Newts</u>** Regarding comments on the population size assumptions, **Environmental Statement** Chapter 6 (Biodiversity) (Document ref. 4.1.06) has been updated with additional information on the potential for GCN to use terrestrial habitat within the site. These updated assumptions have not resulted in any consequential changes to the overall assessment of significance in respect of GCN. Additional measures have been included within the GCN Mitigation Strategy (**Environmental Statement** Appendix 6.10 (Document ref. 4.3.34)) to protect GCN as recommended by NRW. This includes more information in respect of procedures to be adopted during clearance works and species relocation. The GCN surveys undertaken to inform the EIA were undertaken according to the standard CIEEM methodology and guidance. Notwithstanding, additional consideration of weather conditions and timings has been provided for information in the 2021 and 2023 GCN Survey reports

	ii. There is no satisfactory alternative; and, iii. The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range. To avoid developments with planning permission subsequently not being granted a licence, the Local Planning Authority should take Planning Policy Wales and Technical Advice Note 5 into account when considering development proposals where a European Protected Species is present. Please note, for the purposes of providing advice at the planning application stage, our comments are limited to compliance with the third test only. As explained below, although we consider that the size of the GCN population may have been underestimated, we consider that, subject to appropriate mitigation, the proposal should not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range. However, as explained in the respective sections below, we advise that further information is provided with respect to the GCN Mitigation Strategy and the Landscape and Ecological Management Plan (LEMP) as part of the planning application in order to demonstrate that the mitigation is robust. - *GCN population on site* With reference to the impact assessment on construction and decommissioning phases (6.282 – 6.290 ES Chapter 6 we note the impact assessment fails to:	(**Environmental Statement** Appendix 6.4 and Appendix 6.5 (Document ref. 4.3.28 and 4.3.29)). Out-of-date references appeared in the consultation version of the GCN Mitigation Strategy in error. References have been amended to the most relevant and up-to-date reference in the submission version (Appendix 6.10 (Document ref. 4.3.34)). In respect of NRW's comment regarding the presence of GCN in shorter grazed grassland, the reference in the GCN Mitigation Strategy seeks to confirm that the habitat within site will have lower value for GCN than the woodland surrounding the site. The wording of the GCN Mitigation Strategy has been amended to confirm this. Regarding the recommended use of carpet tiles during clearance works to monitor the presence of GCN, the GCN Mitigation Strategy has been updated to confirm that in advance of construction, amphibian fencing will be installed, and carpet tiles deployed and monitored daily over the course of several weeks with any GCN encountered moved out of the working area. This will be undertaken within areas inside the red line boundary of the Proposed Development which are within a 250m buffer of P3. It is proposed that a Biosecurity Method Statement could be required as a condition of the permission to be produced prior to construction of the Proposed Development commencing. Reference to biosecurity has been included under the Tool Box Talk / Site Induction requirements of the GCN Mitigation Strategy. In respect of NRW's comment that an additional pond

	(a) Consider the subterranean behaviour of the species (b) Consider dispersal distances can be up to 500m (c) Consider weather conditions during the springs of 2021 and 2023 The construction phase has potential to cause significant disturbance to surfaces. We also consider the timings of the 2021 and 2023 GCN surveys (ES Volume 3 Appendix 6.4 and 6.5), being undertaken late in the survey season, may mean the size of the GCN population at the site has been underestimated. We do not concur with the potential sensitivity conclusion in 6.290 ES Volume 1 Chapter 6 '*the sensitivity of the GCN population is considered to be low*'). However, notwithstanding the above points, we do not consider it alters our conclusion and the mitigation requirements for the species. - *GCN Mitigation Strategy* We note that the GCN Mitigation Strategy (Document Ref. 4.3.34) provides information on the protective measures and habitat creation measures to be undertaken as part of GCN mitigation. We advise that a revised GCN Mitigation Strategy is submitted as part of any planning application which addresses the following points: a) In section 3.1 of the GCN Mitigation Strategy, reference is made to core habitat and Cresswell and Whitworth (2004). In our view the results of the report are frequently misquoted. Whilst we note the	would be welcomed, the layout of the Proposed Development and the topography of the site limits the available land within the applicant's control for pond creation at the south of the site. Notwithstanding, an area at the north of the site has been designated as a Biodiversity Enhancement Area where three ponds will be created, and the surrounding land managed to provide terrestrial habitat with value for GCN. Further detail is included in the Illustrative Landscape and Ecology Masterplan (Figure 5.10) (Document ref.4.2.44)).

	conclusions of this report, we advise this study is not necessarily transferable in higher pond density landscapes and sites with larger populations. Consequently, we advise the text is amended from a precautionary perspective. b) We agree that there is a lower risk of GCN being present in arable/shorter grazed land. However, in our experience GCN are found in shorter grazed grassland. Consequently, this vegetation type is a predominant habitat type for the species in east Wrexham. c) We advise the GCN mitigation strategy makes reference to more up-to-date references to dispersal of the species; e.g. Haubrock, P.J. and Altrichter, J. (2016). Northern crested newt (Triturus cristatus) Migration in a Nature Reserve: Multiple Incidents of Breeding Season Displacements Exceeding 1km. The Herpetological Bulletin 138: 31-33. d) We note section 4.5.1 – 4.5.9 (ES Volume 3) references habitat clearance works and removals of hedgerows/scrub prior to work commencing. We advise the following within 250m of ponds where GCN have previously been recorded: i. A carpet tiles placed on the ground to monitor the presence of GCN ii. One way fencing to be used to assist site clearance in zones closer to extent records iii. After an approved period, 2-3 works methodology to accord with the submitted details	

	iv. Section 4.5.15-17 (ES Volume 3 Chapter 6) references relocation of GCN. We advise further detail is provided in respect of sites / areas where GCN will be relocated to. e) We note the biosecurity details outlined in section 4.4 of the GCN Mitigation Strategy. We advise a biosecurity risk assessment is completed and subsequent method statement prepared. We advise all contractors/sub-contractors should be required to submit their own Biosecurity Risk assessments. The Tool Box Talk / Site Induction as provided in 4.2 of the GCN mitigation Strategy should include reference to biosecurity. f) We welcome the habitat creation/enhancement outlined in section 2.3 of the GCN Mitigation Strategy. We would also welcome the construction of one or more ponds in the environs of the southern boundary as stepping stones to the GCN populations located in the environs of Johnstown. - *Outline LEMP* We note that the Outline LEMP provides information on the habitat management and species monitoring proposed. We advise that a revised Outline LEMP is submitted as part of any planning application which addresses the following points: a) Biodiversity aims for the site are outlined in section 8.1.1 of the Outline Landscape and Ecology Management Plan (LEMP). In respect of GCN, we advise a target is defined (e.g. medium population with a monitoring key performance indicator of 40 newts by torchlight surveys). b) We welcome that monitoring is to be undertaken throughout the operational phase of the scheme. However,	**<u>Outline LEMP</u>** The **outline Landscape and Ecology Management Plan** (oLEMP) (Document ref. 3.0.6) submitted with the DNS application has been updated in response to NRW comments as follows: a) A specific monitoring target as recommended by NRW has not been defined for P3 given on the basis that it is located outside of the red line boundary and the applicant will have limited ability to control the management of the pond to ensure that the target is met. b) It is welcome that NRW supports the proposed monitoring to be undertaken during the operation phase of the Proposed Development.

	we advise that revised monitoring proposals are required and provide the following advice; i. We advise that with regards to GCN, monitoring will be required biennially (or annually in the event of fish/invasive non-native species are detected) ii. All existing and proposed ponds within the red line shall be monitored biennially unless fish and/or invasive non-native species are detected iii. The advised methodology is the Habitat Suitability Index (HSI) plus 2-3 counts between April and Mid-May iv. The methodology should accord with, and results be reported through the Wales GCN Monitoring scheme c) We also advise that construction phase monitoring (6.354 ES Volume 1) includes an Ecological Compliance Audit for all defined ecological features In addition to comments made above, we also advise that the Outline LEMP is updated to include the following commitments (we would be satisfied for the details of each items to be agreed in the detailed LEMP as a condition of planning permission): • defined aims and objectives for each identified ecological feature (including targets that can be used as key performance indicators for monitoring purposes);, • location plan of ecology ecological features. • habitat management prescriptions, • contingency measures if fish or invasive non-native species (INNS) are detected, • proposals that are capable of being implemented in the event of failure to undertake or to appropriately implement identified or contingency actions, • site liaison and wardening;	i. The outline LEMP has been amended to confirm that monitoring will be undertaken biennially, or annually where the presence of fish or invasive species is found. ii. The outline LEMP has been amended to state that all existing and proposed ponds within the site boundary will be monitored biennially unless fish and/or invasive non-native species are detected, unless otherwise agreed with NRW. iii. Noted – the outline LEMP confirms that the suitability of each pond will be assessed using Habitat Suitability Index (HSI) assessment. iv. The outline LEMP has been amended to confirm that the survey methodology will accord with, and results will be reported through the Wales GCN Monitoring scheme. c) The outline LEMP has been updated to confirm that during the construction phase an Ecological Compliance Audit will be implemented for all defined ecological features. The outline LEMP has been updated to confirm the scope of the full LEMP as recommended by NRW. It is anticipated that the requirements set out by NRW in its response can be required by condition and provided by the applicant prior to the construction of the Proposed Development.

	• licensing requirements for undertaking habitat management and surveillance, • tenure • persons or bodies responsible for commissioning and undertaking management and surveillance together with required skills and competencies, • reporting requirements; and, • proposed dates for updating or revising the management plan. **Bats, Water Vole and Dormice** We note information submitted concerning bats, water vole and dormice and concur with the assessments that there will be no significant adverse effects on these species. In relation to bats, this advice is based on the implementation of the mitigation identified in the ES and Outline LEMP. **Protected Sites** River Dee and Bala Lake Special Area of Conservation (SAC) The development site is located adjacent to a watercourse (Clywedog), which is hydrologically connected to the River Dee and Bala Lake SAC. We advise further information is provided to assess potential impacts on the SAC, as detailed below. - *Foul Drainage* We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphorus	It is noted that NRW concurs with the assessments in respect of bats, water vole and dormice that there will be no significant effects. **<u>Foul Drainage</u>** The Environmental Statement has been updated to include

	levels for all river SACs across Wales. In line with our Planning Advice (August 2023), under the Habitats Regulations, Planning Authorities must consider the phosphorus impact of proposed developments on water quality within SAC river catchments. We therefore advise you to consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms. We note from the information submitted that provision of foul drainage facilities will consist of an on-site composting toilet (which will separate the urine and sanitary waste from the solids) for use by staff and visitors during operational and maintenance works. However, we advise further information is submitted concerning the type of toilet and how the liquid and solid phase are to be disposed of. Depending on the above, the composting toilet may require the registration of a water discharge exemption. Please contact the local environment team for further advice (WrexhamFlintshireEnvironmentTeam@cyfoethnaturiolcymru.gov.uk). - *Pollution Prevention* We have concerns that harm from the proposed development on the SAC cannot be ruled out and have identified pollution as a potential impact pathway to features of the site. We refer you to our comments below (Pollution Prevention section). - *Mobile Features*	detail of the proposed composting toilet which is likely to comprise a 'WooWoo Waterless Toilet'. The composting toilet will separate the urine and sanitary waste from the solids and will be inspected on maintenance visits to the site during the operation of the Proposed Development. This is in accordance with NRW *Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation which* confirms that a well-maintained compost toilet is unlikely to lead to increases in phosphorus discharges to the SAC river environment.

	Otters are a feature of the River Dee and Bala Lake SAC. We agree with the assessment of operational impacts (ES Vol 1 6.315-6.316). The proposed 60m stand-off from the River Clywedog is appropriate and will address potential impacts on the otters. We therefore agree with the conclusions in the shadow HRA that there will be no adverse effect on the integrity of the River Dee and Bala Lake SAC and it's mobile features (otters). <u>Johnstown Newt Site SAC and Stryt Las a'r Hafod Site of Special Scientific Interest (SSSI)</u> The Johnstown Newt Sites SAC and underpinning Stryt Las a'r Hafod Site SSSI is located within 2km of the site. A mobile feature of the sites is Great Crested Newts (GCN). Our comments concerning GCN have been provided in the Protected Species section above. Provided the measures outlined to protect GCN are undertaken we consider that the proposed development is not likely to damage the features for which Johnstown Newt Sites SAC and Stryt Las a'r Hafod Site SSSI are of special interest. As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), PEDW must, before deciding to give consent for a project which is likely to have a significant effect on a SAC site, either alone or in combination with other plans or projects, make an appropriate assessment of the implications of the project for that site in view of its conservation objectives. In the absence of that assessment, NRW cannot advise that the proposals would not result in an adverse effect upon the SAC sites.	**<u>Shadow HRA</u>** It is welcome that NRW agrees with the conclusions in the shadow HRA that there will be no adverse effect on the integrity of the River Dee and Bala Lake SAC and its mobile features (otters). Response in respect of GCN has been provided above. It is noted that as the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), PEDW must, before deciding to give consent for a project which is likely to have a significant effect on a SAC site, either alone or in combination with other plans or projects, make an appropriate assessment of the implications of the project for that site in view of its conservation objectives. The Shadow HRA confirms that there will be no adverse effects on the integrity of the Johnstown Newt Sites SAC or the River Dee and Bala Lake SAC. Whilst there is potential for the development to result in minor disturbance to otter, a qualifying feature of the River Dee and Bala Lake SAC, during the construction / decommissioning phase - this will not result in a likely significant effect. It is considered that the Shadow HRA

		provides sufficient information in order for PEDW to undertake such assessment. **Construction Environmental Management Plan (CEMP)** NRW's advice in respect of the mitigation measures to be included in the detailed CEMP are noted. The Outline CEMP (Document ref. 3.0.5) has been updated to confirm that these measures will be provided within the detailed CEMP prior to construction of the Proposed Development.
	Pollution Prevention - *Construction* The proposed construction works have the potential to cause pollution. We note the submission of the Outline CEMP which details some pollution prevention measures. The Outline CEMP is acceptable in principle; however, we advise that a detailed/final CEMP should include further details on the following. Further detail should be provide on how silt pollution will be prevented and certainty about what will be implemented, to demonstrate that any risk of pollution will be adequately managed. Guidance can be found in GPP6 gpp6-working-on-construction-and-demolitionsites. pdf (netregs.org.uk). Please Note: Relevant personnel must be conversant with pollution prevention requirements (either during the construction phase, as to be detailed in the final CEMP, as well as throughout the operation of the solar farm), including how to deal with any emergency and/or spills and mitigate any offsite impact. Please see the relevant guidance below: gpp-21-final.pdf (netregs.org.uk) Pollution	**Pollution Prevention** The Desktop Study (DTS) included at Appendix 4.6 (Document ref. 4.3.14) has identified that the main groundwater receptor is considered to be the underlying Pennine Lower Coal Measures bedrock aquifer designated as a low vulnerability Secondary A Aquifer. The low vulnerability setting, absence of source protection zones and abstractions in the vicinity of the site would indicate a low sensitivity groundwater setting. Much of the site is overlain by Glacial Till which from available borehole records in the area is approximately 6m in thickness. This deposit is a low vulnerability Secondary Undifferentiated Aquifer of minor value and in addition to forming a protective layer over the Secondary A Aquifer is unlikely to breached by any cable trench excavations and would, from a mainly cohesive composition, retard lateral/vertical migration of any liquid contaminants. The Preliminary Risk Assessment (PRA) included at Appendix 4.6 includes a Conceptual Site Model (CSM) which assessed potential contamination from historical of

	incident response planning: gpp-22-dealing-withspills. pdf (netregs.org.uk) Oil and chemicals must be stored under cover within bunded areas and located at least 10 metres away from any ditch or surface water drain . Spill kits must be located adjacent to chemical storage and readily available in case of spillages. Please refer to relevant GPPs: • GPP 26 Safe storage - drums and intermediate bulk containers | NetRegs | Environmental guidance for your business in Northern Ireland & Scotland • GPP 2 Above ground oil storage | NetRegs | Environmental guidance for your business in Northern Ireland & Scotland The proposed development may require a water discharge permit for discharges from site to surface water, unless it complies with the regulatory position statement Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK (www.gov.uk) . Please contact the Wrexham and Flintshire environment team for further advice (WrexhamFlintshireEnvironmentTeam@cyfoethnaturiolcymru.gov.uk). We advise the production of a Site Waste Management Plan, to encourage waste minimisation and assess all recycling opportunities. We advise that information on the above are provided as part of a revised Outline CEMP. In the absence of any further detail then NRW advise that a final CEMP must be approved by the determining authority as a condition of any planning permission. Condition 1: No development or phase of development, shall commence until a final Construction Environmental	existing activities only (i.e. the baseline environment) and therefore does not consider potential pollution which could be caused as a result of the operation of the Proposed Development. In order to assess the potential impacts of pollution caused as a result of the operation of the Proposed Development, Chapter 8 of the ES has been updated to confirm the proposed conceptual drainage strategy which will be implemented to prevent uncontrolled runoff of contaminated water. The infrastructure will be subject to regular inspection and maintenance checks during the period of operation to minimise the risk of any equipment failure and will be secured through fencing/cameras etc to mitigate against deliberate damage. The transformers are designed to utilise non-toxic, biodegradable insulating fluid. Relevant regulatory oil disposal guidelines will be supplied and followed, including regulatory disposal guidelines for the electronics equipment included in the transformer. The transformers will be regularly monitored in line with requirements and any kiosk or enclosure associated with the transformer will be afforded appropriate environmental protection. In particular, all enclosures shall provide ingress protection to at least IP Rating 55 and in all cases to the IP Level required by the transformer and any other equipment housed therein. Any kiosk enclosure swill itself be constructed for its environment including corrosion and erosion conditions and shall be suitably designed for the prevention of damage caused by livestock and other animals commonly present in the environment. The kiosk or enclosure will be temperature controlled to

	Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. - *Operational phase* The proposal includes a number of elements that has the potential to cause pollution during the operational phase. It is possible that during the 40-year operating life of the Plas Power solar farm, there could be failure events of one or more of the solar farm electrical relay components such as from the transformers. The ES and supporting information has not recognised the potential pollution/contamination risks that could arise from solar farm infrastructure that could fail, including from fire risk and chemical leakage to the subsurface. Such risks could be further heightened by the instigation of preferential shallow flow pathways arising from the cable trenches that will be required across the site. It is noted that the final cable trench design has not been completed although a preferred option has been put forward. It is recognised that the nature of potential risks posed to the ground and groundwater by solar farms that will operate over many decades is not well understood given that solar farms have not been around for very long. Site-specific groundwater conditions are not known, and chemicals released from the operating solar farm could migrate to groundwater and linked receptors such as surface water. We would therefore advise the applicant to consider these in a qualitative risk assessment through a conceptual site model. The risk assessment may downgrade potential risks such as the potential risk that one or several transformers leak chemicals to the subsurface. Risk mitigation could for example be through control measures such as secondary containment around	ensure that the equipment inside is operating within its maximum temperature range and avoid condensation on electrical equipment. Thermal ventilation studies confirming the suitability of the ventilation system and the temperature control system design will be provided by the supplier. Oil-filled transformers will be supplied with a bund adequate for the purpose of containing oil. A minimum bund capacity of 110% of the transformer's maximum oil volume is required and the bund will be shielded to prevent the accumulation of rainwater. Oil-filled transformers will also be equipped with sensors and alarms to communicate any issues.

	transformers which may reduce a potential residual risk to acceptable. Principles related to potential risks posed by infrastructure to the groundwater environment are described within The Environment Agency's approach to groundwater protection (publishing.service.gov.uk) which has been adopted by Wales. - *Decommissioning phase* It is noted that a detailed Decommissioning Assessment has not been provided as part of the ES deliverables. The decommissioning phase should not be considered as '*construction in reverse'*. We advise a detailed Decommissioning Assessment is provided as part of the planning submission. In the absence of any further information then we would advise that a detailed decommissioning plan must be agreed to the satisfaction of the planning authority as a condition of any planning permission. **Designated Landscape** The development site is located approximately 2km east of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB). Our comments relate to the potential impacts of the proposed development on the AONB and are based on the submitted preapplication information, which includes a Landscape and Visual Impact Assessment (LVIA) prepared by RPS (Chapter 5 of the Environmental Statement, dated February 2024).	**Decommissioning** Whilst it is agreed that the assessment of decommissioning effects should not be considered as 'construction in reverse' the assessment of decommissioning effects in the Environmental Statement has adopted this approach in order to facilitate potentially adverse decommissioning impacts to be mitigated by early planning and design. The assessment of decommissioning effects is not detailed at this stage, given that it is unknown what technologies will exist and what environmental conditions will be prevalent at the end of the Proposed Development's 40-year life. It is anticipated that a detailed Decommissioning Assessment can be required by condition of the permission, so that decommissioning effects can be confirmed at a time that future technologies and/or environmental conditions are known. **Landscape and Visual Impact Assessment** Unfortunately some pixilation of the landscape photography occurred as a result of the upload of the documents to the consultation website. High resolution images are provided at application stage. The high-resolution montages illustrate the change more clearly and

	Three representative viewpoints are included in the LVIA to illustrate views from the AONB towards the site (Viewpoints (VP) 9, 10 and 11). VPs 10 and 11 have been used to prepare photomontages (Figure 5.9). We note the photomontages are of a low resolution and this has caused pixilation of the images. We therefore advise that higher resolution images are provided with the planning application. Viewpoints 9, 10, and 11 represent visual receptors (people) walking within the AONB on the following Public Rights of Way (PRoW) – all of whom are considered in the LVIA to have high sensitivity. • PRoW ESC/16 (VP9) • PRoW ESC/31 (VP 10) • PRoW ESC/17A (VP 11). As recognised in the LVIA these receptors have extensive views across the study area to the north-east, and these views would feature the proposed development. The LVIA concludes that visual receptors using these PRoWs would experience a low magnitude of change as a result of visibility of the development and this would result in a moderate adverse (not significant) effect during operation. By summer in Year 15, when mitigation planting is expected to have established, the LVIA considers the effect would be negligible resulting in a minor adverse effect. When considering the potential cumulative impact of the proposed development with other cumulative schemes, the LVIA considers the effect would not reduce to minor but would remain as moderate adverse (not significant) throughout the year (Para 5.250).	whilst at year 15 views of the solar panels would still be obtained, the establishment of the scheme planting would provide additional filtering of views of the Proposed Development making views of the solar panels less visually prominent within the landscape. From the AONB solar panels located in the western portion of the Proposed Development are largely out of view due to the landform. Fields located in the middle section of the Proposed Development would obtain the greatest level of screening in views from the AONB with small parts of these fields being screened from view. This would reduce the overall amount of solar development within the view. It is considered the establishment of the onsite planting would slightly reduce the overall level of perception of the Proposed Development within the landscape and subsequently the level of effect would also be reduced. Fields (parcels) A and B are low lying and do not fall within views obtained from the AONB, to make this clear, field references have been added to the viewpoint photography. Existing hedgerows are located along the western boundary of fields A (to the east of the redline boundary) and B (to the west of the redline boundary) and therefore no planting is proposed along these boundaries. The magnitude of impacts on visual receptors within the AONB is considered to be Negligible at year 15 and lower that at year 1 due to the establishment of the scheme planting would provide additional filtering of views of the Proposed Development making views of the solar panels less visually prominent within the landscape. High sensitivity visual receptors experiencing a Negligible magnitude of impacts would result in Minor adverse effects at year 15.

	With reference to the photomontages prepared for VPs 10 and 11, there does not appear to be a significant difference in visibility of the proposed development between the Year 1 Winter Illustrative Photomontage and the Year 15 Summer Illustrative Photomontage. We therefore question whether the magnitude of change would reduce to negligible as predicted in the LVIA. We consider the change in visibility of the development from viewpoints within the AONB may be limited between Year 1 and 15 due to the limited amount of structural planting shown on the Illustrative Landscape and Ecology Masterplan (Figure 5.10). In particular, the Masterplan appears to show no planting along the western edge of parcels A and B, which appear to be visible from within the AONB (e.g., at VP 10). The reasoning for this possible omission, and the lack of structural planting more generally is unclear. The LVIA does not provide an explanation for the design and layout of the proposed planting, nor identify which planting is intended to integrate the development when viewed from the AONB. Given the adverse impacts identified on receptors within the AONB, we advise the LVIA identifies and explains the planting that has been included in response to views of the development from the AONB. As part of this explanation, we advise confirmation is provided as to whether planting is proposed along the western edge of parcels A and B as identified in the Landscape Masterplan (Figure 5.10). The impact of solar reflections on receptors within the AONB occurring as a result of the proposed development are assessed within the LVIA. This assessment concludes the impact of solar reflections would not result in any greater residual effect on visual receptors at VPs 9, 10, and 11 (within the AONB) than those reported above.	

	Visual changes occurring within the setting of the AONB have the potential to impact upon the character and qualities of the designation. The LVIA has included an assessment of the impacts upon Landscape Character Areas (LCA) identified in the Wexham LANDMAP Supplementary Planning Guidance. The LVIA assesses the impacts on the following two LCAs within the AONB, which it considers have medium-high sensitivity to the proposed development: • LCA 1B (Ruabon and Esclusham Mountain) • LCA 5B (Eastern Slopes of Ruabon Mountain) The LVIA concludes there would be a negligible magnitude of change on the landscape character of these areas resulting in a minor adverse (not significant) effect overall. (Paragraph 5.191 and Page 5-69). The LVIA identifies the potential for in-combination cumulative effects upon the landscape character of these LCAs but considers the increase in potential effects would not be sufficient to raise the significance of effect above (Para 5.238). Overall, we agree with the submitted LVIA that visibility of the proposed development would result in adverse impacts on the landscape character of the AONB and the visual amenity of visitors to the AONB, but that these impacts, and impacts on AONB special qualities, are unlikely to be significant. This is primarily due to the extensive landscape context in which the proposals would be seen when viewed from the AONB, and the influence of existing development and settlement on these views. We question whether the effects on visual receptors within the AONB would reduce to negligible by Year 15 in the summer as predicted in the LVIA. We advise the following	

	additional information is submitted at planning application to allow an understanding of this predicted change and the adequacy of the landscape response (planting) to the adverse impacts identified. • High resolution copies of the photomontages from VPs 10 and 11. • Identification and explanation of the mitigation/ integration planting proposed in response to views from the AONB and the adverse impacts identified on receptors within AONB. As part of this explanation, we advise confirmation is provided as to whether planting is proposed along the western edge of parcels A and B as identified in the Landscape Masterplan (Figure 5.10). **Flood Risk** Our Flood Risk Map confirms the majority of the site to lie within Zone A, with a small proportion within Zone C2 of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning also identifies a proportion of the application site to be at risk of flooding and falls into Flood Zone 2/3 Rivers. The development proposal is for the construction of a solar farm and associated infrastructure. The following comments are based on the proposal being classified as 'less vulnerable' development in accordance with Figure 2 of TAN15. We have reviewed the Appendix 8.1 FCA and Conceptual Drainage Strategy (rpsgroup, February 2024, HLEF 85062). The FCA has reasonably and proportionately addressed flood risk from all sources. We agree with the findings, primarily that there is no built development within	**<u>Flood Risk Assessment</u>** It is noted that NRW has no objection to the development proposal on flood risk grounds. The River Gwenfro was erroneously referred to as a main river in the FCA when it is in fact not a main reiver and therefore not the responsibility of NRW in terms of legislative requirements. The FCA has been corrected. **<u>Flood Risk Activity Permit</u>** A Flood Risk Activity Permit will be secured prior to construction of the Proposed Development commencing.

	Flood Map for Planning zones 2 or 3 other than cable routing. The FCA shows that the risks and consequences could be managed to an acceptable level, we would therefore have no objection to the development proposal on flood risk grounds. Please Note: The River Gwenfro is not a main river as indicated in the FCA and therefore not the responsibility of NRW in terms of legislative requirements. - *Flood Risk Activity Permit* Section 8.23 of the 'ES Volume 1' references the cable routes which are proposed to cross a main river and its associated flood zone. The report anticipates no adverse impact due to digging beneath the river. The FCA (section 4.3.3) confirms the 33kV cable route to the Legacy substation will pass underneath the River Clywedog. Please note that the Environmental Permitting Regulations (2016) require the obtainment of a bespoke Flood Risk Activity Permit for any works or structures located in, under, over or within 8 metres of the bank top of the River Clywedog, a designated "main river". Further advice and guidance is available on our website: http://www.naturalresources.wales/permits-and-permissions/flood-risk-activities/flood-riskactivity-permits-information/?lang=en **Other Matters** Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.	

Community consultees

8.3 Responses were provided by the following community consultees:

Consultee Name	Consultee Responses	Lightsource bp response
Coedpoeth Community Council	The recent adjustments to relocate the solar panels further from the Plas Power Farm development are indeed a positive step, aiming to mitigate potential impacts on nearby residents. However, it's imperative that all residents residing in close proximity to the solar panels have ample space between their properties and the installations, meeting at least the minimum standards outlined by the World Health Organization (WHO). Where this criterion isn't met, we must object and advocate for necessary revisions to the plans. Regarding the addition of battery storage, while it may offer potential benefits, it's crucial to address community concerns. The technology is relatively new and untested, and its proposed location adjacent to the River Clwyedog raises significant environmental and safety apprehensions. The potential risks associated with accidents or fires at the battery storage facility cannot be overstated, warranting careful reconsideration and exploration of alternative options. In determining community benefits, it's essential to prioritize the interests of Coedpoeth residents, given that the majority of the land and all inconvenience resulting from the project fall within this area. This includes considerations such as proximity to residential housing and the preservation of the local environment. Any developments extending into farmland north of the A483 should be subject to thorough	**Impact on Nearby Residents** It is noted that Coedpoeth Community Council recognise the positive steps that have been taken to amend the proposals to set back the solar panels from residential properties, in particular the nearby residents south of the A525. Whilst the impact to this group of residential receptors in this location have been reduced through direct engagement and the project design taking on board their concerns, it should be noted that consideration to the impacts of nearby residential receptors has been considered surrounding the entire site. This is demonstrated by the Residential Visual Amenity Assessment that is contained within Appendix 5.7: Residential Visual Amenity Assessment (RVAA) (Document ref. 4.3.23) that assesses the proposals against a residential visual amenity threshold determining whether the nature and / or magnitude potentially affects living conditions or residential amenity; the conclusions of this assessment determine that this threshold is not met or exceeded. It is also worth clarifying that as part of our application we have produced the following assessments which directly assess impacts to residential receptors: • Chapter 5: Landscape and Visual Assessment (Document ref. 4.1.05) • Appendix 5.1 Glint and Glare Assessment (Document ref. 4.3.17) • Appendix 4.5: Noise Impact Assessment (Document ref.

	assessment and clarification regarding land quality and suitability for solar farm development before proceeding. While we acknowledge that construction may unavoidably inconvenience residents, particularly road users, we are willing to accept such inconveniences provided there is demonstrable and substantial community benefit for Coedpoeth residents. However, we are not willing to accept the current plans as they will create a dangerous junction and significantly more traffic. We also require a plan which reduces speed limits and reduces access in current 'rat runs' – e.g. Rhos Berse Road and Nant Road. Finally, it's crucial for Lightsource to fulfil its statutory obligations to engage with all affected residents transparently and comprehensively. Failure to do so risks disproportionately disadvantaging residents, highlighting the need for swift and appropriate action to address any deficiencies in engagement processes.	4.3.13) Following the implementation of mitigation measures as outlined within the various environmental assessments, no significant environmental effects have been identified upon nearby residential receptors. Following the pre-application consultation Lightsource bp have met with residents close to the northern limits of the site and have proposed some additional planting along the northern border and also within the biodiversity area to the west to minimise impact on views from their properties. Reference is made to meeting the minimum standards outlined by the World Health Organization (WHO) outlining a minimum distance between properties and the solar panel installations. Lightsource bp is not aware of a specific separation distance provided by the WHO, and there are reports that conclude that living in proximity to a solar farm is not harmful to human health. The design has however carefully considered the distance from residential developments and appropriate mitigation is proposed, including setbacks and increased screen planting. **<u>Community concerns pertaining to energy storage systems</u>** A detailed battery safety management plan will be produced in advance of construction (an outline version has been submitted as part of the planning application '**Outline Battery Safety Management Plan**' (Document ref. 3.0.7)). Lightsource bp propose that this is a condition to the application. The detailed battery safety management plan will carefully cover all safety aspects in designing, building, operating, and even decommissioning an energy storage

		facility, and it provides measures to both prevent incidents and good defence-in-depth measures. The detailed battery safety management plan will outline how the Proposed Development complies with the latest National Fire Chiefs Council (NFCC) Guidance on battery safety. In addition to this, Lightsource bp have engaged in early discussions with the North Wales Fire Safety Service (FRS), to allow them to review and influence the plans. Lightsource bp will continue to engage as the project develops and ensure that they fully understand the site, the technology, and how to keep the local environment and people in the community safe in the extremely unlikely event of an emergency at our site. Lightsource bp take safety at our sites very seriously and we source the best-in-class modular energy storage systems from reputable manufacturers that we know and are produced in factories that we regularly inspect. Lightsource bp choices prioritise safety and durability. Each battery container typically contains four battery units, plus integral monitoring, temperature control, fire suppression and firefighting systems, built in so that if an abnormal temperature change is detected, the cell automatically disconnects from the battery. Following community feedback from the pre-application consultation, some minor changes have been made to the Proposed Development relating to energy storage safety, this includes an update to Appendix 8.1: Flood Consequences Assessment (FCA) & Conceptual Drainage Strategy to include further clarification on how fire water will be managed in the unlikely event of a fire. Further detail can be found within this document included within the planning application but to summarise, the drainage design associated with the energy storage site has allowed capacity for fire water to be captured and cycled for re-use in the event of a fire. This has been managed by lining and appropriately sizing the attenuation pond downstream of the energy storage site that will be

		controlled via a pen-stock valve. This will allow fire water to be captured and prevented from entering the local surface waterbodies and or groundwater if any form of contamination has occurred. In addition to this, an additional gate and access to the energy storage site has been included to align with the NFCC battery safety guidelines, the second access should only be used if the primary access to the energy storage site is unfeasible. This change is shown on the updated indicative site layout included within the planning application. **Community benefit** The project is committed to providing £500,000 in community benefit to the local community, ensuring that those in closest proximity to the proposals benefit, which of course includes the community of Coedpoeth. The project has taken on board feedback following the pre-application consultation where opinions on support for local initiatives were raised. As the project progresses, the community benefit offering will be developed and a formalised method for distributing the funding / grants will be established, it should be noted that community funding is dependant on the proposals achieving planning approval and will be distributed throughout the proposals 40-year lifetime. The community benefit fund is separate from the planning process, so we will continue to engage with the community council once the application is submitted on how the benefit is secured and best invested for the benefit of community. **Farmland north of the A525** The land north of the A525 that has been identified within the

		proposals for the placement of solar panel infrastructure is also the location for two biodiversity and landscape enhancement areas, this land has been assessed fully as part of our planning application documents and environmental statement, in specific regard to your question relating to the quality of land please refer to **Environmental Statement Chapter 10: Soils** (Document ref. 4.1.10) which is also appended by Appendix 10.1: **Outline Soils Resource Management Plan** and Appendix 10.2: **Agricultural Land Classification Survey Report** (Document refs. 4.3.41 and 4.3.42). Chapter 10 of the ES assesses the impacts to soils and confirms that the boundary of the site was amended to exclude any best and most versatile agricultural land and that all of the site is classified as subgrade 3b based on the predictive ALC and as a result of site surveys that were undertaken. It is also worth noting that the installation of the solar PV arrays does not adversely affect soils or land quality, which has resulted in a negligible effect as identified by this assessment. The Outline Soils Resource Management Plan also provides a description of how soil as a resource will be managed throughout the construction and operation of the development to prevent and minimise adverse effects. **Traffic concerns** With regard to increased traffic and junction safety, a Road Safety Audit was carried out on the proposed site access arrangements and did not make observations regarding the visibility provided at these locations. It is therefore concluded that the concept layouts provide the appropriate visibility splays for the speeds identified and as such, combined with the proposed temporary warning signing indicating the site access to drivers, is considered sufficiently safe for the proposed construction and operation phases. The estimated vehicle movements during construction are relatively low (15

		HGVs and 4-6 LGVs daily peak) and as such any impact on traffic along A525 is considered to be negligible. It is not considered likely that the estimated vehicle movements will impact or increase any existing rat-running that may occur along Rhos Berse Road and Nant Road, nor is it likely to discourage drivers from travelling along A525. The recorded Automatic Traffic Count (ATC) data collected as part of the baseline analysis evidences average vehicle speeds which are consistently below the 50mph speed limit, which is considered good from a road safety perspective. If required by Wrexham Council through its review of the proposals, a temporary speed reduction could be incorporated to create a 40mph speed limit to cover the site accesses. Temporary speed limits would require repeater signs and would only form a speed limit in line with the current average speed and may be considered ineffective. **Community engagement** The statutory obligations to engage with all affected residents has been followed through the recent pre-application consultation. It was however, brought to Lightsource bp's' attention at one of the in-person events that a particular adjoining property did not receive the postal notification. Lightsource bp have reviewed the mail out and confirm a letter was sent. Lightsource bp have engaged with the owner of the property since the community consultation events and continued beyond the close of consultation to address concerns and respond to questions. In particular work has been carried out to further assess and minimise impact on their visual amenity, including a property visit to better understand potential impacts. As a result, additional hedgerow and tree planting has been included in the proposals to screen the views of the proposals from the site.

A Westlake - Coedpoeth Ward Councillor WCBC	The recent adjustments to relocate the solar panels further from the Plas Power Farm development are indeed a positive step, aiming to mitigate potential impacts on nearby residents. However, it's imperative that all residents residing in close proximity to the solar panels have ample space between their properties and the installations, meeting at least the minimum standards outlined by the World Health Organization (WHO). Where this criterion isn't met, we must object and advocate for necessary revisions to the plans. Regarding the addition of battery storage, while it may offer potential benefits, it's crucial to address community concerns. The technology is relatively new and untested, and its proposed location adjacent to the River Clwyedog raises significant environmental and safety apprehensions. The potential risks associated with accidents or fires at the battery storage facility cannot be overstated, warranting careful reconsideration and exploration of alternative options. In determining community benefits, it's essential to prioritize the interests of Coedpoeth residents, given that the majority of the land and all inconvenience resulting from the project fall within this area. This includes considerations such as proximity to residential housing and the preservation of the local environment. Any developments extending into farmland north of the A483 should be subject to thorough assessment and clarification regarding land quality and suitability for solar farm development before proceeding. While we acknowledge that construction may unavoidably inconvenience residents, particularly road users, we are willing to accept such inconveniences provided there is demonstrable and substantial community benefit for Coedpoeth residents. However, we are not willing to accept the current plans as they will create a dangerous junction	See above

	and significantly more traffic. We also require a plan which reduces speed limits and reduces access in current 'rat runs' – e.g. Rhos Berse Road and Nant Road. Finally, it's crucial for Lightsource to fulfil its statutory obligations to engage with all affected residents transparently and comprehensively. Failure to do so risks disproportionately disadvantaging residents, highlighting the need for swift and appropriate action to address any deficiencies in engagement processes.	

Adjoining owner / occupiers

8.4 Responses were provided by the following adjoining landowners:

Adjoining Landowner	Landowner Responses	Lightsource bp response
The Woodland Trust	Woodland Trust Position The Trust previously responded to a public consultation on this project in July 2023, citing our concerns regarding the proximity of the development to a number of areas of ancient woodland. We note that some of our comments have been addressed, however, we still have some concerns regarding this project. Namely, we hold concerns with respect to the design of the project and potential for impacts on ancient woodland, veteran trees, our own Plas Power Woods site and the important historical feature of Offa's Dyke. In our previous response we highlighted the importance of ancient woodland and the protection afforded to it through planning policy. Our wording within that response is still	**Proximity to Ancient Woodlands and Trees** As part of the design evolution process, a 25m buffer was incorporated into the layout to separate any physical infrastructure (excluding security fencing for which a 15m buffer has been adopted) from all Ancient Woodland. This was incorporated in response to feedback received from the Woodland Trust in July 2023. All veteran trees recorded during the Tree Survey have been given a veteran buffer zone 15x the diameter of the stem, this has been shown on the Tree Protection Plan and denoted with a dashed, rather than solid line. The development layout has observed these zones and as such, no development falls within these locations. All Ancient Woodland has been mapped and included on the Tree Constraints Plans/ Tree

	largely relevant in that respect and should be taken into consideration and so we will not be revisiting those elements in great detail. Instead, this response will detail our remaining concerns and updates to policy since that consultation response. <u>Updated Planning Policy</u> The Welsh Government recently updated Planning Policy Wales by issuing edition 12 in February 2024. Planning Policy Wales edition 12 (PPW 12) strengthens previous policy on ancient woodland and ancient and veteran trees, recognising that they are declining and becoming increasingly fragmented and emphasising the importance of their conservation. PPW 12 states the following in paragraph 6.4.43: “Ancient woodland, semi-natural woodlands, individual ancient, veteran and heritage trees and ancient hedgerows are irreplaceable natural resources, and have significant landscape, biodiversity and cultural value. Such trees, woodlands and hedgerows are to be afforded protection from development which would result in their loss or deterioration unless very exceptionally there are significant and clearly defined public benefits; this protection must prevent potentially damaging operations and their unnecessary loss. In the case of a site recorded on the Ancient Woodland Inventory, authorities should consider the advice of NRW. Planning authorities should also have regard to the Ancient Tree Inventory, work to improve its completeness and use it to ensure the protection of trees and woodland and identify opportunities for more planting as part of the Green Infrastructure Assessment, particularly in terms of canopy cover.” <u>Main Areas of Concern</u>	Protection Plans to ensure that appropriate buffers are afforded. Upon review, it has been identified that there are two locations at which the 25m buffer zone has been encroached erroneously. As a result, the final development layout has been amended to ensure that a 25m buffer is adopted throughout the site. As a result of these amendments, the submission version of the development layout is in full accordance with PPW12 in respect of the protection afforded to Ancient Woodland. All trees within the red line boundary of the Proposed Development have been subject to a Tree Survey and Arboricultural Impact Assessment (AIA) (Document ref. 4.3.24). The Proposed Development only interacts with Offa's Dyke where the underground cable route connects to the Legacy substation to the south-west. Any trees to be affected within these cable route corridors have been considered in the AIA and where necessary, trenchless techniques/ directional drilling as outlined in BS5837:2012 are to be used to avoid the need for tree removal where the proposed cable route crosses sections of woodland and/or tree groups. **<u>Battery Energy Storage System and Fire Risk</u>** A detailed battery safety management plan will be produced in advance of construction (an outline version has been submitted as part of the planning application **Outline Battery Safety Management Plan** (Document ref. 3.0.7) the detailed battery safety management plan will carefully cover all safety aspects in designing, building, operating, and even decommissioning an energy storage facility, and it provides measures to both prevent incidents and good defence-in-depth measures. The Detailed battery safety management

	We acknowledge that the consultation brochure details that no development will be sited within 25m of the ancient woodland at Plas Power Woods, however, it is not clear whether other ancient woodlands within and adjacent to the development site will be provided with a similar buffer. We would appreciate confirmation that all ancient woodlands will have a 25m buffer zone that will not be encroached on from any form of development, with such a buffer being established prior to construction. Ancient and veteran trees must also be provided a sufficient buffer zone of 15 times the stem diameter, without a 15m radius cap. Further to this, we are concerned by the location of a battery energy storage system close to our ancient woodland site. While it is stated that Plas Power Woods will be afforded a 25m buffer to development, we are concerned that this area could represent a safety issue. We are aware of a number of issues that have occurred with malfunctioning of batteries at similar projects across Europe, resulting in large fires. Therefore, locating a large battery storage area near to the sensitive environmental receptors (ancient woods and veteran trees), as well as being a busy public site, is a concern to us. We would want to see a re-design of the development to ensure that such an area is sited away from ancient woodland and in a location with better access for fire services should any malfunctions occur. We note that the consultation brochure makes mention of Offa's Dyke and efforts have been made to remove this land from the site. It is, however, still imperative that the sanctity and connection of Offa's Dyke to the wider landscape is maintained. Offa's Dyke contains an important population of ancient and veteran trees that must be protected. In continued preparation of the design and development of this	plan will outline how the Proposed Development complies with the National Fire Chiefs Council (NFCC) Guidance on battery safety. In addition to this, we have engaged in early discussions with the North Wales Fire Safety Service, to allow them to review and influence our plans. We will continue to engage as the project develops and ensure that they fully understand the site, the technology, and how to keep themselves, the local environment and people in the community safe in the unlikely event of an emergency at our site. The risk of a battery fire is extremely low. Nevertheless, we take safety at our sites very seriously and we source the best-in-class modular energy storage systems from reputable manufacturers that we know and are produced in factories that we regularly inspect. The batteries are tested extensively in the real world and our choices prioritise safety and durability. Each battery container typically contains four battery units, plus integral monitoring, temperature control, fire suppression and firefighting systems, built in so that if an abnormal temperature change is detected, the cell automatically disconnects from the battery. **Construction Traffic** Construction traffic will not impact on the Trust's Plas Power Woods site or other irreplaceable habitats outside the land holdings. All construction traffic will route into the site via the A525, and will use existing access tracks across the site, as well as new access tracks that will be constructed as part of the Proposed Development. The layout of new access tracks throughout the site has sought to avoid impacting on habitats, including trees and hedgerows. There will be some limited removal of hedgerows and trees to create the new access, which is detailed in the Arboricultural Impact Assessment

	project, full arboricultural surveys must be undertaken to account for any other ancient and veteran trees in the vicinity and ensure that such trees are fully protected. Finally, we would appreciate further information regarding the protection of ancient woods and veteran trees during construction of the proposals. It is not clear how construction traffic might impact on the Trust's Plas Power Woods site or other irreplaceable habitats outside our land holdings. <u>Conclusion</u> Ancient woods and veteran trees are irreplaceable habitats. Any development resulting in their loss or deterioration must be reconsidered to ensure avoidance of harmful impact. In summary, the Woodland Trust continues to hold concerns in respect of these proposals. We would welcome the opportunity to discuss our concerns in further detail with the project team. If the project team would like to engage the Trust on these matters, then please contact us via campaigning@woodlandtrust.org.uk.	(Document ref. 4.3.24) and Chapter 6 Biodiversity (Document ref. 4.1.06) of the **Environmental Statement**

8.5 In addition, two adjoining landowners to the north of the site attended the events including Mr and Mrs Dixon of Adwy Grange, Tan Llan, Coedpoeth, Wrexham, LL11 3EL and Myra Ryan of Adwy Farm, Adwy Lane, Coedpoeth, Wrexham, LL11 3EL. Feedback at the events, and through subsequent feedback forms (Myra Ryan) and engagement mostly related to potential impacts on their residential visual amenity. In response, Lightsource bp commissioned RPS Group to visit the properties and take photos to inform further screening proposals which included additional trees and hedgerows along the northern boundary and within the biodiversity area to the north-west of the site. Mr and Mrs Dixon have also expressed their support for the biodiversity area.

9. Main issues raised by non-statutory consultees and consequent actions

9.1 During the consultation period residents and interested parties were invited to provide feedback on the Proposed Development. They were able to do so online, by completing the hard copies or giving an email response.

9.2 The table below summarises the issues raised by non-statutory consultees during the statutory consultation and the response from Lightsource bp.

Issue Raised	Lightsource bp Response
Issue Access/Traffic	
Traffic: Some respondents queried what the impact of the Proposed Development might be on traffic surrounding the development, particularly on the A5252. "I would like to know how much extra traffic and for how long would be using the A525."	The estimated vehicle movements during construction are relatively low and will consist of approximately 15 Heavy Goods Vehicles (HGVs) and 4-6 Light Goods Vehicles (LGVs) daily in the peak construction period and as such any impact on traffic along the A525 is considered to be negligible. It is not considered likely that the estimated vehicle movements will impact or increase any existing rat-running that may occur along Rhos Berse Road and Nant Road, nor is it likely to discourage drivers from travelling along A525. The construction period is estimated to last 1 year. An **outline Construction Traffic Management Plan** (oCTMP) (Document ref. 3.0.5) has been produced which sets out the measures to manage construction traffic to reduce impacts on the roads as far as practicable. Prior to construction, a detailed CTMP will be produced to provide further detail in respect of construction traffic management measures. Once operational, the Proposed Development will be monitored remotely and will not require any permanent staff to be located on-Site. Occasional maintenance activities will be required, typically for solar panel cleaning and occasional visits for substation and BESS upkeep. This would equate to approximately 1-2 visits per month. For further information relating to traffic please refer to **Transport Statement** (Document Ref: 3.0.3) submitted within the application.

Landscape and visual impact	
Agricultural land: Concerns were raised about the loss of agricultural land. *"The loss of open spaces and productive agricultural land is also unacceptable."*	The Site was selected to avoid areas of Best and Most Versatile (BMV) agricultural land. An area of 1.6 ha was identified from field survey to be subgrade 3a "good" quality land. This involved a small strip of land bordering the northern boundary of the Site. The design of the Proposed Development was subsequently amended to exclude this area. The effect on BMV has been minimised by design, with BMV excluded from the Proposed Development. In addition, an **outline Soil Resources Management Plan** (oSRMP) has been produced to ensure that soils and land quality will be managed carefully during construction, operation and decommissioning of the Proposed Development and this is located within Appendix 10.1 of the Environmental Statement (Document ref. 4.3.41). The installation process involves only small areas of land for tracks and transformer bases to be disturbed. Adherence to good practice and timing outlined within a soils management plan and will mean that the effects on land and soil are only minor or negligible and are not significant.
Battery Energy Storage System (BESS)	
Safety: Several respondents raised concerns about the safety of BESS systems, citing the fire risk and its location near dwellings. *"As for the impact of the battery storage, the potential for a fire or explosion so close to populated areas and a major city is frightening."*	A detailed battery safety management plan will be produced in advance of construction (an outline version has been submitted as part of the planning application), the detailed battery safety management plan will carefully cover all safety aspects in designing, building, operating, and even decommissioning an energy storage facility, and it provides measures to both prevent incidents and good defence-in-depth measures. The Detailed battery safety management plan will outline how the Proposed Development complies with the National Fire Chiefs Council (NFCC) Guidance on battery safety. In addition to this, Lightsource bp have engaged in early discussions with the North Wales Fire Safety Service, to allow them to review and influence our plans. Lightsource bp will continue to engage as the Proposed Development develops and ensure that they fully understand the Site, the technology, and how to keep themselves, the local environment and people in the community safe in the unlikely event of an emergency at our Site. Lightsource bp take safety at our Sites very seriously and we source the best-in-class modular energy storage systems from reputable manufacturers that we know and are produced in
Noise: Concerns were raised about the impact that noise might have. *"Noise has negative impacts on health and wellbeing"*	
Location: Concerns were raised that the BESS was located too close to residencies and/or ancient woodland. *"battery storage is too close to community and ancient woodland"*	

Pollution: Concerns were raised that the BESS could lead to pollution. “There is inherent danger of fire and explosion from this technology and also airborne and ground-based pollution.”	factories that we regularly inspect. The batteries are tested extensively in the real world, and our choices are prioritising safety and durability. Each battery container typically contains four battery units, plus integral monitoring, temperature control, fire suppression and firefighting systems, built in so that if an abnormal temperature change is detected, the cell automatically disconnects from the battery. As detailed in Appendix 8.1: **Flood Consequences Assessment (FCA) & Conceptual Drainage Strategy** (Document ref. 4.3.37) the drainage design associated with the energy storage site has allowed capacity for fire water to be captured and cycled for re-use in the event of a fire. This has been managed by lining and appropriately sizing the attenuation pond downstream of the energy storage site that will be controlled via a pen-stock valve. This will allow fire water to be captured and prevented from entering the local surface waterbodies and or groundwater if any form of contamination has occurred. This is a precautionary approach which will be further developed in advance of construction during the detailed drainage design stage. The battery energy storage system has been located in the position shown on the indicative layout through careful consideration of a variety of factors, a key aspect that influenced the location is the natural visual screening that is afforded by the woodland located south of the energy storage system. It is also important to note that the design has allowed for a buffer between the woodland and the BESS. With regard to concerns relating to noise generated by the battery energy storage system, a noise impact assessment has been produced to assess the operational noise impacts from the Proposed Development and is available within Appendix 4.5 of the **Environmental Statement** (Document ref. 4.3.13) and further details regarding the noise levels produced can be found within this document. In summary, an environmental sound survey was undertaken at the Site to quantify the existing noise climate and derive appropriate operational noise emission criteria in line with the requirements of WCBC. Mitigation measures have been included as part of the design, to reduce adverse noise impacts at the nearest noise sensitive receptors. Following the implementation it has been demonstrated that the Proposed Development is unlikely to give rise to significant adverse noise impacts with adverse impacts also sufficiently minimised at the nearest receptors and thus will not harm or disrupt the existing residential amenity.

Biodiversity	
General: There was significant support shown for the planned biodiversity improvements across the Site. *"I think the ecological considerations of the project seem to have been taken into account and I hope this will remain for the future."* However, some concerns were raised that the measures would not offset the impact of the development. *"I don't believe your ecological proposals and mitigation measures to boost biodiversity are valid. Token creation of new habitats will not compensate for the loss of open spaces and land access"*	The impact to habitats and species within the Site is assessed within Chapter 6: Biodiversity of the **Environmental Statement** (Document ref. 4.1.06) and further information regarding the assessment of biodiversity can be found there. To reduce the impact to higher value habitats, stand-offs will be implemented, including field boundaries and adjoining woodland, watercourses and waterbodies. The substantial separation of the working area from the River Clywedog will minimise potential impact pathways. The biodiversity value of the Site will be maintained and enhanced through sensitive design enabling the retention of all higher value features and the creation of new habitats with value for wildlife. The Proposed Development would result in the conversion of low value habitat, primarily arable farmland to grazing pasture with neutral grassland boundaries. It is considered that overall, the Proposed Development will result in a direct, permanent, long-term, beneficial, residual effect on habitats of up to minor significance (which is not significant in EIA terms). The design has evolved to take into account wildlife present within and adjoining the Site. It is worth noting that there will be minimal temporary loss of grassland and hedgerow habitat suitable for GCN, reptiles, dormouse and nesting birds. The wooded habitats adjacent to the Site will not be adversely affected by the Proposed Development with no potential impact on their use by otter and the otter population for which the River Clywedog forms part of their territory will not be affected by the Proposed Development. Very low numbers of ground nesting birds may be displaced into adjoining arable land and the potential requirement for the felling of individual trees to enlarge access points within the Site has a low likelihood of affecting a bat roost. The sensitive timing of works and species protection measures will protect any populations present. The majority of trees and all hedgerows will be retained protecting the potential value of the Site for roosting bats. Replacement foraging habitat for wintering birds will be created. The creation of new ponds, hedgerows, tussocky grassland and wildflower grassland will benefit a range of species including GCN. Grassland and pond creation alongside hedgerows will maintain flightlines and have the potential improve the value of the Site for foraging bats.
Ornithology: The presence of certain species of birds close to the Site was raised *"we do have nesting hawks, etc near the proposed site and I would hate for them to be disturbed"*	
Plants: Queries about what plants would be included in the habitat management plan and what the ration of removed/replaced trees, hedgerows and saplings would be the presence of Japanese Knotweed in the biodiversity area was also raised *This section is very vague on the net effect of habitat destruction vs creation regarding trees & hedgerows. Do you have figures on mature trees & saplings and mature hedgerows destroyed versus proposed plantings, and what stage of growth will the new trees & hedgerows be"*	

	The long-term management with biodiversity objectives, supported by targeted monitoring, is designed to deliver benefits for habitats and species. Overall, the Proposed Development will develop higher value for biodiversity than the existing Site with the potential for a minor positive effect of significance in the context of the Site. Details of the proposed ecological mitigation and enhancement proposals are contained within the following documents accompanying the planning application: - **Environmental Statement** Chapter 6: Biodiversity (Document ref. 4.1.06)**.** - Appendix 6.8: Outline Landscape and Ecology Management - **Illustrative Landscape and Ecology Masterplan** (Document ref. 2.0.4) As outlined in the **outline Construction Environmental Management Plan (oCEMP)** (Document ref. 3.0.5), pernicious weeds like Japanese Knotweed would be treated with an appropriate herbicide immediately after identification on site and continue treating as necessary to achieve complete eradication.
Climate Change	
Opposition to renewables: A concern was raised about the loss of green space due to energy companies. *"Soon there will be no green space left in the local area because of greedy energy companies pushing their 'green energy' agenda."*	The Proposed Development would provide an immediate contribution to the UK's ambition to increase solar generation capacity fivefold as set out in the Energy Security Strategy and increase flexibility of the grid through greater storage capacity. The Welsh Government has set a target of generating 70% of consumed electricity by renewable means by 2030 (a revised target is currently being consulted upon (100% by 2035)). Future Wales is the latest expression of national planning policy.
Support for renewables: A number of respondents expressed support for renewable energy. *"I would like to see this happen given it will increase our green energy Generation"*	
Community Benefit Fund	
General: It was suggested that the Community Benefit Fund was not commensurate. *"The proposal to donate some of the profit from generating power to local communities is a pittance and could possibly be viewed as a bribe*	As stated within our pre-application consultation material, as part of the Proposed Development we will provide a fund of £1,000 per MW capacity which will be distributed between Coedpoeth and Esclusham community councils and a further £400,000+ will be invested in local projects and initiatives for community benefit.

to local representatives so as they give backing to this proposed project"	It is important to Lightsource bp that communities that host our renewable energy projects directly benefit from the contribution they are making to support the delivery of cheaper, secure and low carbon energy that benefits all of Wales, and the UK. It is acknowledged that the interests of local residents should be prioritised when consideration the community benefit offering. The Proposed Development is committed to providing community benefit to the local community, ensuring that those in closest proximity to the Proposed Development's benefit. The Proposed Development has taken on board feedback following the pre application consultation where opinions on support for local initiatives were raised. As the Proposed Development progresses, the community benefit offering will be developed and a formalised method for distributing the funding / grants will be established, it should be noted that community funding is dependent on the Proposed Development achieving planning approval and will be distributed throughout the Proposed Development's 40-year lifetime.
Idea: A number of respondents suggested recipients for a community benefit fund as well as ideas how it should be managed.	
Consultation	
Timings: A query was raised about the timings of the consultation events, suggesting they prevented people from attending in the evenings.	As part of the pre-application consultation, three in person events were held. These comprised: Plas Pentwyn Community centre, Castle Road, Coedpoeth, LL11 3NU • Wednesday 13th March – 12pm to 4pm. • Thursday 14th March 9.30am to 1pm Rhostyllen Parish Hall, Vicarage Hill, Rhostyllen, LL14 4AR • Thursday 14 March - 14:30pm to 6:30pm Whilst we appreciate that there was no evening session in Coedpoeth, the event in Rhostyllen did extend to 6:30 pm. In addition to this, all of the consultation material was made available on our webpage throughout the consultation period, including a link to the feedback form.
Landowner engagement: A responder raised that they had not be contacted as an adjacent landowner.	The statutory obligations to engage with all affected residents has been followed through the recent pre-application consultation. It was however, brought to Lightsource bp's' attention at one of the in-person events that a particular adjoining property did not receive the postal notification. Lightsource bp have reviewed the mail out and confirm a letter was sent. Lightsource bp have engaged with the owner of the property since the community consultation events and continued beyond the close of consultation to address concerns and respond to questions. In particular work has been carried out to further

	assess and minimise impact on their visual amenity, including a property visit to better understand potential impacts. As a result, additional hedgerow and tree planting has been included in the proposals to screen the views of the proposals from the site.
Assessments: A responder asked to see details of the assessment's taken.	The full environmental impact assessment (EIA) is contained within the Environmental Statement submitted as part of the planning application and was also made available as part of the pre-application consultation on the project website. A non-technical summary is also provided as part of the planning application which summarises the outcomes of the Environmental Statement technical assessments.
Consultees: A responder asked if the Woodland Trust or North Wales Wildlife Trust had been consulted.	The Woodland Trust have provided feedback following the pre-application consultation, the design has taken on board their comments with regard to a 25m buffer between solar panels and ancient woodland and a response to the woodland trust is contained within the consultation report submitted as part of the application.
Cultural Heritage	
Grid connection: It was raised that the grid connection could have an impact on historical landmarks and that an archaeologist should be employed accordingly. *"if so when digging the cable trench please can you employ an archaeologist as there may be evidence connected with the Dyke or the Mound that may help date them"*	An assessment of the impact from the Proposed Development during the construction and operational phase on built heritage and archaeology is included within Chapter 7: Cultural Heritage of the **Environmental Statement** (Document ref. 4.1.07)**.** the potential impacts on setting of designated heritage assets from the original version of the Proposed Development were assessed and discussed with Cadw, the Local Planning Authority, and CPAT. Subsequent changes to the design have much reduced potential impacts on the settings of Scheduled Monuments and Listed Buildings. This has been achieved by pulling the Proposed Development as a whole back from Offa's Dyke and the solar arrays back the Listed Buildings at Plas Power. The grid connection will run underground and once constructed, will be reinstated to pre-construction conditions. Consequently, potential operational phase impacts relating to the grid connection have been avoided through design. During construction, mitigation is embedded in the design, in the form of avoidance of areas of greatest archaeological potential and the use of HDD where the cable route crosses the scheduled Offa's Dyke. Mitigation beyond this will take the form of offsetting the physical loss of archaeological remains through an appropriate programme of archaeological works that will allow for hitherto unrecorded archaeology to be identified and appropriately recorded. The scope of this work set out in a Written

	Scheme of Investigation (WSI) and will include details of expected on-site staffing and specialists. Potential impacts on the scheduled Offa's Dyke where its line may be crossed by the proposed grid connection will be avoided either by routing the grid connection along an existing road and hence existing break in the dyke or the use of horizontal directional drilling (HDD). Should the latter option be selected, a geophysical survey will be undertaken to establish the depth of the archaeological features and HDD used to insert the cable at sufficient depth under the Scheduled Monument to prevent any direct or indirect disturbance. There will consequently be no impact on the physical fabric of the scheduled Offa's Dyke.
Environmental Assessment Methodology	
General: It was raised by a responder that there was not enough information on the environmental impact. A different responder raised that the Proposed Development took into account the environmental impact. *"Proposals appear to take into account the environment and immediate local residents."*	The Environmental Statement (ES) submitted with the planning application and as shared within the pre-application consultation. It has been prepared in accordance with the EIA Regulations and contains the information specified in Regulation 17 and Schedule 4 of the EIA Regulations. For the avoidance of doubt, the specified information within Regulation 17 and Schedule 4 is provided in Appendix 1.3 of the **Environmental Statement** (Document ref. 4.3.03)**.** Table 1.1 included within Chapter 1: Introduction of the **Environmental Statement** (Document ref. 4.1.01). sets out the information required under Schedule 4 of the EIA Regulations together with an indication of where this is addressed in the ES.
Grid Connection	
General: A responder asked where electricity from the Proposed Development would go.	The Proposed Development would provide an immediate contribution to the UK's ambition to increase solar generation capacity fivefold as set out in the Energy Security Strategy and increase flexibility of the grid through greater storage capacity. The Proposed Development will include a 33kV cable that will connect the solar farm, BESS and associated infrastructure to the existing Legacy Substation located approximately 1.2km to the south-west of the Site, north of the B5246 Bronwylfa Road which connects into the National Grid.
Hydrology and Hydrogeology	
Flooding: Concerns were raised about the water run-off leading to flooding.	A Flood Consequences Assessment and Conceptual Drainage Strategy has been produced and is included within Appendix 8.1 of the Environmental Statement. Details of surface water management are contained within the Flood Consequences Assessment (FCA). To

	summarise the findings, the Proposed Development is expected to increase permanent impermeable areas within the Site by 0.03%. Sustainable urban drainage system (SuDS) strategy has been produced to incorporate appropriate management techniques that will mitigate potential increase in runoff from the Proposed Development (see Appendix 8.1 of the **Environmental Statement** (Document ref. 4.3.37). SuDS techniques include filter strips, swales and attenuation for ancillary features is proposed via gravel basis in which infrastructure will be located upon. Access tracks will be constructed out of permeable materials. Solar PV arrays are designed in such a way to prevent surface water sheeting off panels and potentially causing erosion. Panels are designed to allow surface water to drip off, landing onto filter strips below. All ancillary features will be placed on a gravel or concrete subbase sized to accommodate the 100 year + 20% climate change critical storm event. The detailed design stage will confirm exact construction methodology. The detailed operational drainage design will be developed pre-construction with the objective of achieving drainage of the land to the present level.
Landscape and visual	
General: Concerns were raised about the visual impact of the Proposed Development, both the general impact it would have on the wider area, as well as the view from nearby residential properties. *"Strongly opposed due to scale which lends itself to a vision of industrialisation"* Questions were also asked about the impact of glint and glare *"I would also like to know how efficient the anti-glare coating on the solar panels is?"* It was also raised that the evolution of the Proposed Development had responded to concerns. *"It is encouraging to see that the consultation you undertook in 2023 that the proposals were updated to remove and set back the solar panels that had a visual impact on properties located near the site."*	The landscape and visual assessment contained within Chapter 5: Landscape and Visual Assessment of the **Environmental Statement** (Document ref. 4.1.05) assesses the impact the Proposed Development has on landscape character as well as the visual impact of the Proposed Development on sensitive receptors (for example residential properties). Overall, the assessment determined that the quality and character of the landscape and visual resources would be maintained and would have the capacity to accommodate the Proposed Development. Please refer to **Environmental Statement** Chapter 5: Landscape and Visual Assessment (Document ref. 4.1.05)**.** for further details. For details regarding the visual screening that will be provided throughout the Site please refer to the **Illustrative Landscape and Ecology Masterplan** (Document ref. 2.0.4)**.** A Glint and Glare Assessment has been prepared and is presented within Appendix 5.1 of the **Environmental Statement** (Document ref. 4.3.17)**.** The conclusions of the assessment determine that no significant impacts are predicted on surrounding road safety, residential amenity, and observers located at the identified viewpoints in the surrounding area and mitigation is not recommended.

Security: A responder asked about the visual impact of security measures such as lighting and fencing.	The Proposed Development will be secured by perimeter fencing. This will be deer fencing with wooden posts at circa 3.5m centres. The fence will be approximately 2m high with small mammal gates fitted at appropriate points to enable free access into and out of the Site, see Figure 2.25 of the **Environmental Statement** (Document ref. 4.2.26)**.** The security fencing will function to restrict unauthorised access into the Site and to deter theft or vandalism. Deer fencing has been selected due to its relative visual permeability and minimal impact on natural surface water flows. A minimum distance of 3m will be maintained between the security fencing and the solar arrays. CCTV cameras will be carefully positioned around the periphery of the Site. These cameras will be up to circa 2.5-3.0m high on galvanised steel posts and will be directed into the solar PV areas. They will use passive infra-red technology, thereby avoiding the need for lighting. These will enable remote surveillance of the Site. Refer to Figure 2.27 of the **Environmental Statement** (Document ref. 4.2.28) for further details. CCTV is also proposed around the BESS compound. Refer to the **Environmental Statement** (Document ref. 4.1.02). Some temporary task lighting may be required during construction depending on the time of year and sunlight levels. The BESS compound includes lighting columns adjacent to each BESS enclosure as shown on Figure 2.14 of the **Environmental Statement** (Document ref. 4.2.15). Each lighting column will be designed as shown on Figure 2.24 (Document ref. 4.2.25). The lighting in the BESS compound will only be used in the event of an emergency taking place during the dark and will not be used as part of the regular operation of the Site. Further details of the description of the Proposed Development can be found in Chapter 2: Proposed Development Description of the Environmental Statement. The assessment of visual impacts is presented in **Environmental Statement** (Document ref. 4.1.02).
Miscellaneous	
Land ownership: Queries were raised about the ownership of the land.	The land does not change hands and the current landowner will retain the land, Lightsource bp will lease the land from the landowner for the period of the Proposed Development.
Risk Assessment: A responder asked if risk assessments were carried out.	The ES provides all information required under Regulation 17 and Schedule 4 of the EIA regulations. The information supplied within the ES is considered to provide a clear understanding of the likely significant effects of the

	Proposed Development upon the environment, and the likely residual effects having regard to the mitigation proposed, taking account of the fact that effects will be both negative and positive.
Project time: A responder asked how long the Proposed Development would last.	The Proposed Development would be operational for a period of up to 40 years, following which, it will be decommissioned. Construction will take 12-18 months, and the energy storage will be phased after the solar farm element of the project, as detailed in **Environmental Statement** (Document ref. 4.1.02).
Sustainability: A responder asked if the materials used in the Proposed Development were recyclable.	Waste produced during construction will be kept to a minimum and will be managed and sorted accordingly. Only registered waste management companies will be utilised to dispose of construction waste (packaging, wood, metal) or waste from the construction team (general domestic or canteen/kitchen waste). The specialist engineering, procurement and construction (EPC) contractor hired to construct the Proposed Development will ensure that all waste is disposed of responsibly using only licensed waste management companies. This will be subject to appropriate due diligence checks prior to contracting. Following decommissioning there will be significant potential for recycling many of the materials used in the Proposed Development. Solar panels are almost entirely made up of glass, aluminium, and silicon which can all be separated and recycled. Since January 2014, solar panels in the UK have been covered by The Waste Electrical and Electronic Equipment Regulations 2013 (as amended), which require recycling of the panels at the end of their operational life. Lightsource bp is a member of the PV Cycle UK take back scheme for this purpose.
Public Ownership: A responder queried if public ownership of the Proposed Development was being considered.	Public ownership is not something that is being considered for the Proposed Development, however, as stated within our pre-application consultation material, as part of the Proposed Development, we will provide community funding of £1,000 per MW capacity which will be distributed between Coedpoeth and Esclusham community councils and a further £400,000+ will be invested in local projects and initiatives for community benefit. It is acknowledged that the interests of local residents should be prioritised when consideration the community benefit offering. Lightsource bp is committed to providing community benefit to the local community, ensuring that those in closest proximity to the Proposed Development's benefit. The Proposed Development has taken on board feedback following the pre application consultation where opinions on support for local initiatives were raised. As the Proposed Development progresses, the community benefit offering will be developed and a formalised method for distributing the funding / grants will be established, it

	should be noted that community funding is dependent on the Proposed Development achieving planning approval and will be distributed throughout the Proposed Development's 40-year lifetime.
Business Rates: A responder asked if the Proposed Development would pay business rates.	Yes, the Proposed Development will also pay business rates to WCBC of around £3.3 million associated with the operation of the solar panels over its 40-year operational lifespan, this figure would increase upon commissioning of the BESS.
Energy Bills: A responder asked if the Proposed Development specifically, or solar power in general would lower energy bills.	The Proposed Development includes the energy storage system which will store excess energy during low-demand periods (e.g., nighttime) and discharge it during peak hours. By doing so, this will reduce strain on the grid during high-demand times and help stabilise electricity prices. The Proposed Development will enhance the integration of renewable energy sources into the grid ensuring a smoother transition to cleaner energy.
Proposed Development benefit – tree planting: Several responders raised that trees should be planted as part of the Proposed Development.	New areas of habitat will be created to offset the conversion of arable to grassland and the loss of a very small extent of improved grassland. New habitats also include hedgerow and tree planting. The new habitat will provide a significant increase in habitats with biodiversity value, providing an overall net biodiversity benefit (Biodiversity Net Gain is outlined in Appendix 6.9) (Document ref. 4.3.33). Habitats will be sensitively managed to promote their value for biodiversity. The Proposed Development will result in the following Biodiversity Net Gain: • The habitat unit score will increase from 273.59 to 449.62 Habitat Units, providing an overall total on Site net change of 64.34%. • The hedgerow unit score will increase from 49.02 to 84.20 Hedgerow Units, providing an overall total on Site net change of 74.63%. • The river unit score will remain unchanged at 2.25 River Units. The full suite of landscape and ecological proposals are included within **Illustrative Landscape and Ecology Masterplan** (Document ref. 2.0.4).
Proposed Development benefit – local benefit A responder asked how they would benefit from the Proposed Development.	The Proposed Development includes the energy storage system which will store excess energy during low-demand periods (e.g., nighttime) and discharge it during peak hours. By doing so, this will reduce strain on the grid during high-demand times and help stabilise electricity prices. The Proposed Development will enhance the integration of renewable energy sources into the grid ensuring a smoother transition to cleaner energy. It is also worth noting that as part of the Proposed Development, we will provide community funding of £1,000

	per MW capacity which will be distributed between Coedpoeth and Esclusham community councils and a further £400,000+ will be invested in local projects and initiatives for community benefit. It is acknowledged that the interests of local residents should be prioritised when consideration the community benefit offering. The Proposed Development is committed to providing community benefit to the local community, ensuring that those in closest proximity to the Proposed Development's benefit. The Proposed Development has taken on board feedback following the pre application consultation where opinions on support for local initiatives were raised. As the Proposed Development progresses, the community benefit offering will be developed and a formalised method for distributing the funding / grants will be established, it should be noted that community funding is dependant on the Proposed Development achieving planning approval and will be distributed throughout the Proposed Development's 40-year lifetime.
Needs and alternatives considered	
General: Questions were asked if alternatives to the Site, in particular brownfield sites had been considered. *"There are huge areas of brown land that could be used that are not too close to town's and villages."*	Lightsource bp is committed to delivering renewable developments across the UK to meet the changing needs of current and future generations. In the context of the current climate emergency and the national commitments to meet net zero targets, there is an increased demand to obtain our energy requirements from green sources across the whole of the UK in locations where renewable technologies are optimised to maximise site efficiencies. Lightsource bp undertakes continuous nationwide assessments of land opportunities but, in order for schemes to progress, this must be where land is available in agreement with landowners' commitments to supporting the provision of green energy production to meet a sustainable future. It is rare to find a site which meets all the other requirements for a large-scale solar farm, such as close to a point of connection with capacity, with no significant environmental designations or features, and minimal impact on the environment. Once a potential site location is identified, a more detailed site selection process is undertaken. This process is critical to ensuring that an efficient, technically and economically viable solar and BESS project can be developed without causing unacceptable significant adverse environmental effects. An evaluation of site constraints and opportunities was undertaken to inform an initial concept design. This has subsequently been refined through a combination of technical assessments and engagement with various stakeholders. Further detail on the alternatives considered are contained with Chapter 3:

	Assessment of Alternatives of the Environmental Statement.
Use of agricultural land: Responders raised that potatoes were currently being grown on the land north of the A525, suggesting it was therefore high-quality land and the development should not be permitted by the Senedd, while other comments raised were that "suitable" farm land should not be used, and that that there was hope that landscaping would compensate for the loss of fields. "I still can't see how the productive fields to the right hand side of the A525 (going away from Wrexham) these are presently growing potatoes, so I don't understand how the Welsh Senedd gave the ok."	The inclusion of the land parcels north of the A525 were included in the Proposed Development following the 2021 community consultation because the land was subsequently determined to be suitable for siting PV panels for a variety of reasons but notably due to confirmation from the Agricultural Land Classification Survey Report that was undertaken which determined that the agricultural land is classified as Grade 3b and not considered to be best and most versatile.
Proposed Development Changes	
General: A number of responders raised that they supported the changes made to the Proposed Development following the non-statutory consultation *"Very happy with the new biodiversity areas. They should improve the locale."* *"Pleased that solar panels are moved away from homes and the main road"* *"It is encouraging to see that the consultation you undertook in 2023 that the proposals were updated to remove and set back the solar panels that had a visual impact on properties located near the site."* *"It is good to see that the impact of the project which has been listened to by the project by taking steps to avoid any impact to nearby properties. I'm sure that has a great deal of benefit."*	Noted and acknowledge the positive feedback.

Other engagement

Traveller engagement

9.3 A council run gypsy and traveller site is located between the A483 and the Site. To ensure that the community were engaged the Traveller and Liaison contact at WCBC was notified as part of the consultation.

9.4 During the consultation event at the Plas Pentwyn Community Centre, it was identified by Travelling Ahead (a Gypsy, Roma and Traveller advocacy and advice service) that some residents of the Site were not in contact or regular communication with WCBC and may therefore be unaware of the statutory consultation. Members of the project team attended a traveller meeting at the Plas Pentwyn Community Centre that was being held at the same time as the consultation event, however nobody wished to engage at that meeting.

9.5 After the consultation, the project team reached out to Travelling Ahead to gain their view on the Proposed Development. The feedback was:

- Gypsy and Traveller community on this Site has not been sufficiently engaged.
- Off-set of the solar panels from the boundary of the Gypsy and Traveller site.
- Explore potential opportunities for community benefits with the Gypsy and Traveller community.

9.6 Following this feedback, Lightsource bp reached out to Travelling Ahead to respond to the comment raised stating:

- The Gypsy and Traveller site was included in the consultation zone to receive the newsletter at the launch of the statutory consultation.
- There is approximately 50m between the boundary of the Gypsy and Traveller site and the nearest panels. This area will include the intervening tree planting on the boundary, a meadow and grassland, and some fencing.
- Lightsource bp are keen to engage with them further in the future to discuss the community benefit offer for this community.

10. Summary and conclusion

10.1 This consultation report documents the actions taken by the Lightsource bp to undertake the statutory post-notification publicity and consultation set out by section 61Z of the 1990 Act Articles 5-11 of the Order. However, the report also demonstrates the Lightsource bp's willingness to go beyond the statutory requirements.

10.2 The responses to the consultation have been documented, considered and acted upon by the Lightsource bp, with the following amends made upon the Proposed Development summarised below:

- Additional planting of trees and hedgerows to the north of the site to provide a greater level of screen to properties on Tan Llan;
- Increased set-backs from ancient woodlands and veteran trees adjacent to and within the site; and
- An updated drainage strategy to ensure water to manage water on site, including management of fire water (in the unlikely event it is needed), to avoid impacting on nearby watercourses.

10.3 This report demonstrates the activities undertaken by Lightsource bp in both undertaking the consultation in line with the relevant legislation and also where Lightsource bp has utilised best practice guidance in taking further steps in engaging with interested parties.

10.4 Furthermore, the report identifies how the consultation responses received have been addressed – either by answering the questions posed and making reference to other application documents or explaining how the Proposed Development (whether that be the methodology, assessment or other feature) has been altered to account for this.

10.5 It is considered by Lightsource bp that the consultation process, both the informal and formal statutory stages, was essential and valuable in respect of both obtaining and understanding feedback on the Proposed Development and implementing these changes, where appropriate. The Environmental Statement and Design and Access Statement include sections on the evolution of the design from inception through to submission.

10.6 Importantly, the pre-application consultation process has identified and addressed matters raised by consultees ahead of the submission of the application to PEDW. This process and the content of this report demonstrates how Lightsource bp has considered the matters raised, resulting in a more refined scheme for consideration.