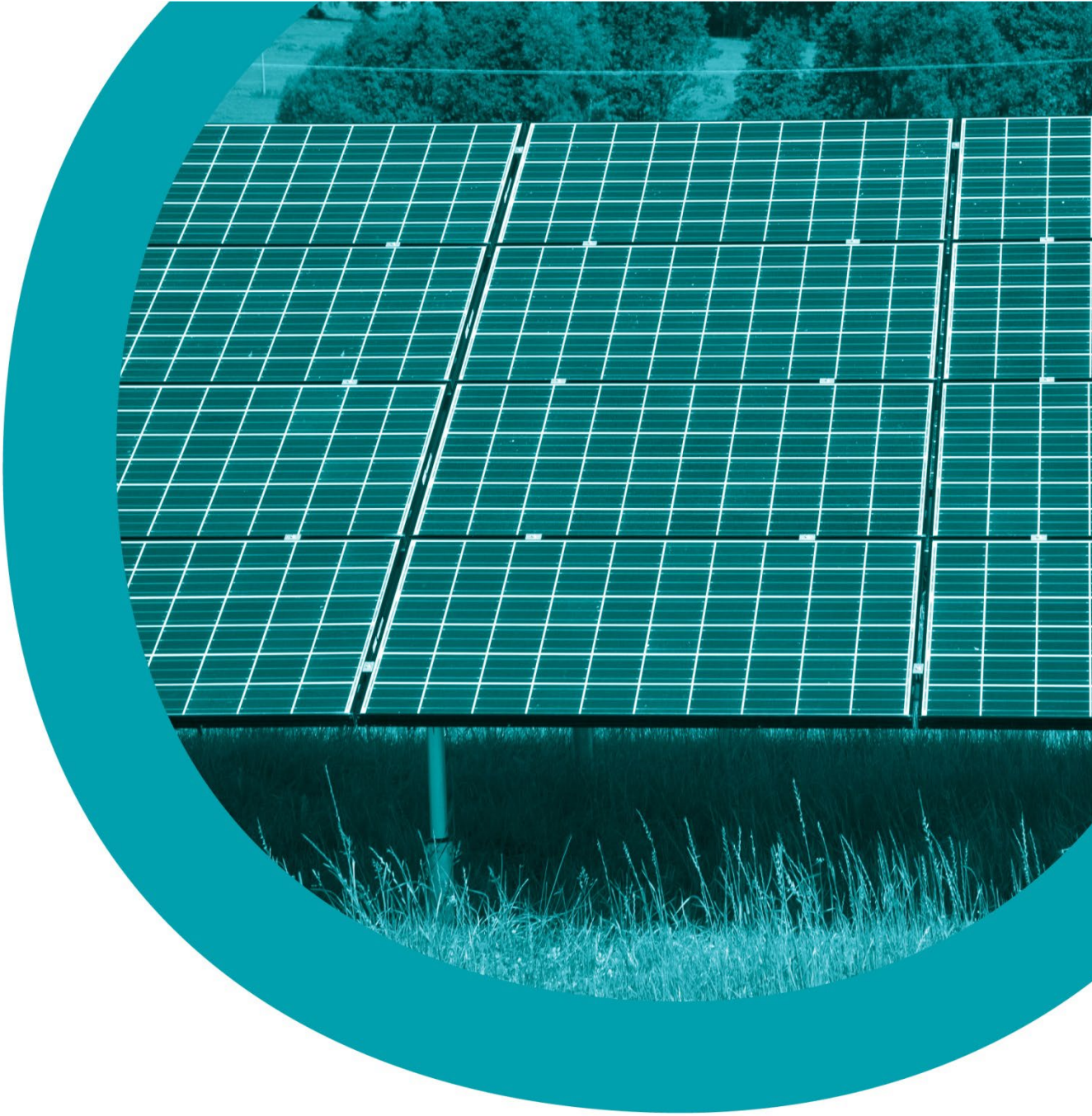


Hafod Road Solar Scheme

Environmental Report

Applicant: National Trust

Date: August 2025

dulas
inspiring renewable energy

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1. INTRODUCTION

1.1.1 This Environmental Report (ER) accompanies a planning application for a small-scale solar scheme, including associated civils infrastructure, that is up to 1072kWp in capacity on land off Hafod Road, east of Johnstown, approx. 3km south west of Wrexham ('the Proposed Development'). See *Figure 1 Site Location*.

1.1.2 Prepared by Dulas Ltd on behalf of the applicant, National Trust, this ER presents a full description of the proposed scheme, the relevant planning policy framework, and information supplementary to the environmental reports on the assessment of potential effects of the proposed solar scheme. The ER is structured to present in the initial chapters the planning policy framework (Ch. 2), under which the proposed scheme will be determined by the planning authority, and a full description of the project (Ch. 3).

1.1.3 Accompanying this ER will be the reports that present the findings and conclusions of the environmental assessments conducted in regard to the development site in order to provide the evidence base necessary to allow the planning authority to make an informed decision on the proposed development.

1.1.4 The following reports accompany this ER:

- Landscape and Visual Appraisal;
- Glint and Glare Assessment;
- Landscape Scheme and Management Plan;
- Ecological Mitigation and Enhancement Statement;
- Flood Consequence Assessment and Drainage Strategy;
- Preliminary Ecological Appraisal;
- Land Contamination Assessment;
- Heritage Impact Statement;
- Noise Assessment; and,
- Coal Mining Risk Assessment.

1.1.5 In association with the planning forms, plans and this ER, an outline Construction Environmental Management Plan (CEMP), outline Construction Traffic Management Plan (CTMP), a Design and Access Statement (DAS) and a Consultation Report (CR) are also submitted to support the planning application.

1.2 General Description of Scheme and Benefits

1.2.1 The proposed development comprises a ground-mounted photovoltaic (PV) solar scheme located on approximately 2.9 hectares (ha) of principally arable agricultural land.

1.2.2 The scheme would comprise a series of rows of solar arrays, each comprising tables for the mounting of solar panels. Solar photovoltaic panels provide a method of generating electrical power by converting solar irradiation into Direct Current (DC) electricity using silicon semiconductor materials. Each panel is typically composed of multiple silicon solar cells.

1.2.3 Individual PV panels are arranged in module units (tables) which are installed on a mounting structure, which itself would be formed of metal frames anchored to the ground using pile driven foundations. Panels have a typical design life of up to 35 years. Multiple module tables are connected to form solar arrays, which are themselves connected to string inverters. The inverters change the Direct Current (DC) to Alternating Current (AC), a conversion that is required to export the electricity to the on-site substation. The substation connects to the DNO substation, which exports the generated power to the local electricity network.

1.2.4 The description of the development for the purposes of the planning application is:

Solar farm comprising the construction and operation of multiple solar PV arrays , inclusive of a customer substation, DNO substation, string inverters, a temporary construction area and ancillary facilities, boundary security fence with CCTV units, an access track, all associated works and landscape enhancement measures.

1.2.5 *Figure 2 Site Layout* illustrates an overview of the proposed solar farm layout.

1.2.6 The solar scheme will generate an estimated 1.05MWh annually, which is sufficient to power the equivalent domestic electricity requirements of approximately 420 homes

annually[1]. This will also result in annual offsetting reductions in carbon dioxide emissions associated with conventional power generation equivalent to approximately 453 tonnes annually.

1.2.7 The proposed development site (the 'Site') is not located within any recognised national area protected for landscape, ecology, hydrology or archaeology. The Welsh Government's predictive Agricultural Land Quality tool indicates that the Site is covered by Grade 3b which is not best and most versatile agricultural land. It is proposed that the land will continue to be utilised underneath the solar panels when the site is operational to graze sheep.

1.3 Pre-Application Consultations

Environmental Impact Assessment (EIA) Screening

1.3.1 A request for an EIA Screening Opinion was submitted to Wrexham County Borough Council (WCBC) on 26th September 2024 by Dulas on behalf of the Applicant. On 25th October 2024, WCBC determined that the development is not an EIA development and that the application need not be accompanied by an Environmental Statement (ref SO/2024/1002).

1.3.2 The Screening Opinion of WCBC is presented in Appendix 1.

Pre-Application Planning Advice

1.3.3 Subsequent to the Screening Opinion, a request for pre-application advice was submitted to WCBC to inform the scope of the assessments and this Environmental Report. A response from WCBC was received on 29th January 2025, and is presented in Appendix 2.

1.3.4 In the response, the planning officer informed Dulas of the recent high court judgement on 20th December 2024, advising '*The judgement of the 20th December 2024 does not, by itself, alter the status of the LDP as 'the development plan', as defined in section 38(4)(c) of the 2004 Act. In accordance with section 38(6) of the 2004 Act, any planning applications or appeals must be determined in accordance with the development plan unless material considerations indicate otherwise. The LDP therefore remains adopted and therefore the*

[1] Based on average home use of 2500kWH per annum

starting point for the determination of planning applications until the Court orders to the contrary.'

1.3.5 Submission requirements were confirmed as set out below; alongside each requirement is a description of the assessment / report in which such information is presented:

Table 1 - WCBC Planning Requirements

Planning Requirement	Relevant Report / Chapter
Design and Access Statement	See *Design and Access Statement (DAS)* submitted with the planning documents
Surface Water Drainage Strategy	Standalone report
Transport Assessment	Standalone report
Landscape and Visual Appraisal with photomontages from critical viewpoints	Standalone report and photomontages
Glint and Glare Assessment	Standalone report
Landscape scheme and management plan, including a planting plan	Standalone document
Biodiversity Matrix and mitigation to demonstrate Biodiversity Net Benefit	Standalone document
Ecological Appraisal	Standalone report
Planning Statement	Included in section 2 of this Environmental Report
Land Contamination Assessment	Standalone report
Construction Environmental Management Plan	Standalone report
Heritage Impact Assessment	Standalone report
Assessment of the mineral resource	Included in section 2 of this Environmental Report

1.3.6 Additional assessments carried out:

Coal Mining Report and Risk Assessment	Standalone report
Noise Assessment	Standalone report

2. PLANNING POLICY CONTEXT

2.1 Introduction

2.1.1 The policy and planning policy framework relevant to the proposed Hafod Road Solar Scheme is summarised in this section. Included are a brief overview of national policy on renewable energy and the need underpinning new clean energy development, and a description of the Wrexham Unitary Development Plan and Local Development Plan policies relevant to this development / location.

2.1.2 The chapter does not appraise the proposed solar farm scheme against the policies and guidance in the relevant planning policy framework, or attempt to take into account all other material considerations (for example appeal decisions, weight attributable to national energy policy) which would be relevant to the determination of this proposal.

2.2 UK and Welsh Energy Policy

2.2.1 This section provides an overview of the national energy policy both at the UK level, and also for Wales.

UK Policy and Targets

Climate Change Act 2008

2.2.2 *The Climate Change Act 2008* is the basis for the UK's approach to tackling and responding to climate change. The Act committed the UK to reducing greenhouse gas emissions by at least 80% of 1990 levels by 2050. It requires the Government to set legally-binding 'carbon budgets' to act as stepping stones towards the 2050 target.

2.2.3 *The Sixth Carbon Budget (Dec 2020)* enshrined a new target in law to reduce emissions by 78% by 2035.

2.2.4 *Climate Change Act 2008 (2050 Target Amendment) Order 2019* in June 2019, the UK adopted a 2050 net zero emissions reduction target.

2.2.5 Further relevant recent Policies include:

- *The Energy White Paper: Powering our Net Zero Future (December 2020)* – puts in place a strategy for the wider energy system, identifying that clean electricity should become the predominant form of energy.
- *Labour Government and Commitment to Renewables (2024)* – of relevance in terms of the new UK Government approach to net zero. The Labour Party Manifesto states that it has '*a national mission for clean power by 2030.'.*

Wales Climate Change and Energy Policy

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

2.2.6 In April 2015 the Welsh Assembly passed into law *The Wellbeing of Future Generations (Wales) Act***,** which is primary legislation requiring all Wales' based public bodies - such as local authorities, health boards etc - to put long-term sustainability at the forefront of their thinking, and to work with other organisations and the public to prevent and tackle ongoing social, environmental and economic problems. The Act was decided upon following an extensive consultation period known as the National Conversation. It passed into law in April 2015.

2.2.7 In order to create a more sustainable Wales, public bodies must work towards seven Well-being Goals and enact the five Ways of Working, shown in the attached image. One fundamental challenge in Wales which is a focus of the Act is dealing with climate change and the potential impact upon the prosperity and quality and life in Wales.

2.2.8 Further relevant recent legislative introductions for Wales include:

- *The Environment (Wales) Act 2016* – which set in place an obligation on Welsh Government to reduce greenhouse gas emissions by 80% against 1990 levels by 2050.
- *Prosperity for All: A Low Carbon Wales (2019)* - this document outlines the Welsh Government's proposed approach to emissions reductions and transitioning to a low carbon economy in accordance with required carbon cuts enshrined in the Environment Wales Act 2016.

- Net Zero Wales, Carbon Budget 2 (2021) ('the Net Zero Wales Plan') the plan states that the Welsh Government accepted the Climate Change Committee's (CCC) recommendation to achieve a 95% reduction in greenhouse gas emission by 2050.
- 100% Renewable Electricity Generation Target for Wales by 2035 – a written statement published by the then Welsh Minister for Climate Change, Julie James.

2.3 Planning Policy

2.3.1 This section provides an overview of national and local planning policy of relevance to the Proposed Development.

National Planning Policy

Future Wales: The National Plan to 2040

2.3.2 *Future Wales: The National Plan to 2040* is a framework for planning the change and development Wales will need over the next two decades. Future Wales: *'Supports a low carbon economy and the decarbonisation of industry, and the growth of sustainable and renewable energy.'*

2.3.3 Policy 17 – Renewable and Low Carbon Energy and Infrastructure sets out requirements in respect of renewable energy of relevance to the Proposed Development. It states:

'The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs.

In determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency.'

Planning Policy Wales (PPW) 2024 Edition 12, February 2024

2.3.4 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of *Technical Advice Notes* (TANs), Welsh Government Circulars and policy clarification letters, which together with PPW provide the overall national planning policy framework for Wales.

2.3.5 PPW is strongly supportive of renewable energy and its objective is for low carbon electricity to become the main source of energy in Wales (para 5.7.1), whilst paragraph 5.9.1 clearly states that "*Local authorities should facilitate all forms of renewable and low carbon energy development… planning authorities should seek to ensure their area's full potential for renewable and low carbon energy generation is maximised and renewable energy targets are achieved*."

2.3.6 The target is for Welsh renewables to generate electricity equal to 70% of Wales's consumption by 2030. In 2023, the Welsh Government increased this to 100% consumption by 2035.

Technical Advice Notes

2.3.7 A series of TANs supplement PPW. Those of relevance to this application are:

- TAN 5: Nature Conservation and Planning (2009)
- TAN 11: Noise (1997)
- TAN 12: Design (2016)
- TAN 15: Development and Flood Risk (2025)
- TAN 18: Transport (2007)
- TAN 24: The Historic Environment (2017).

2.3.8 It is noted that Wrexham is a National Growth Area under Policy 1, where the Welsh Government supports sustainable growth including investment in infrastructure.

Local Planning Policy

2.3.9 It is noted that a recent planning appeal decision P/2023/0738 concluded that the current adopted development plan is Future Wales and the Wrexham Unitary Development Plan 1996 to 2011 (adopted in 2005), and that it has been 20 years since the adoption of the UDP, that whilst unadopted and not part of the development plan, the LDP policies have been subject to examination and found to be sound, and as such are a significant material consideration. Therefore, relevant policies from both the UDP and the LDP have been included within this report.

Wrexham Unitary Development Plan (1996-2011)

2.3.10 Policies of relevance to the consideration of this potential application that have been identified are set out below:

Strategic Policies

- Policy PS2 The Broad Location of Development: *Development must not materially detrimentally affect countryside, landscape/townscape character, open space, or the quality of the natural environment.*
- Policy PS12 Renewable Energy

Specific Policies

- Policy GDP1 Development Objectives
- Policy EC2 Agricultural Land
- Policy EC4 Hedgerow, Trees and Woodland
- Policy EC6 Biodiversity Conservation

Wrexham County Borough Local Development Plan (2013-2028)

2.3.11 Policies of relevance to the consideration of this potential application that have been identified are set out below:

- Objective SO10 which seeks to *"Reduce carbon emissions and maximise our resilience to and mitigate and adapt to the impact of climate change*".
- Policy RE1 Development and Renewable Energy/Low Carbon Technology requires *"developers of…major sites (…development exceeding 1000m^2) to incorporate schemes which generate energy from renewable and low carbon technologies…"*
- Policy RE2 Renewable Energy Schemes supports the generation of energy from renewable and low carbon sources. The scheme is outside the Local Search Areas identified in the LDP, however the policy states "*Outside LSAs proposals for…solar…will be supported in appropriate locations."* The proposed development complies with the details set out in paragraph 4.224, as site specific constraints have been addressed (see Design and Access statement for details on how constraints informed the development

area), and that the proposal is compliant with the LDP policies as detailed in the supporting assessments.

- Policy SP12 Design Principles and Masterplanning Framework states that "*proposals must demonstrate how they have taken account of local characteristics of surrounding areas and how innovative design solutions will enhance the quality of the… natural environment."* Both the Landscape Visual Assessment and the Ecological Mitigation and Enhancement Statement set out measures that demonstrate the project's sensitivity to and positive enhancement of the surrounding natural environment.
- *Policy SP14 Natural Environment* states that new development will be supported only where it protects, conserves and enhances the natural environment including protected species and their habitats - there will be no significant impacts on the natural environment, and net benefit to biodiversity will ensure the biodiversity of the site is improved.
- Policy SP16 Minerals Supply and Safeguarding - The development is within the buffer zone, not the minerals area itself, the development is temporary and therefore does not sterilise the land.

2.3.12 In conclusion, the project is in accordance with the relevant planning policies in the Unitary Development Plan and the Local Development Plan.

3. DESCRIPTION OF PROPOSED DEVELOPMENT

3.1 Introduction

3.1.1 This section of the ER describes the construction, operation and decommissioning stages of the Proposed Development.

3.1.2 Included are details of the likely construction programme of the scheme, the components of construction activities, resource requirements, transportation details, site operation and site decommissioning details. It is recommended that this report is read in conjunction with the Hafod Road Solar Scheme Design and Access Statement, which describes the design principles that have underpinned the selection, evolution, design and specification of the Proposed Development.

3.2 Overview of the Development

3.2.1 The proposed scheme principally comprises a series of solar arrays hosting multiple solar panels that are connected to the local grid via a client substation and DNS substation. The arrays are raised on mounting frames, which are pile-driven into the ground. The arrays are accessed by a site track which would be utilised for construction and operation & maintenance.

3.2.2 The height of the ground across the proposed development area for the solar scheme is between 95m to 100m Above Ordnance Datum (AOD). The location of the proposed development boundary for the solar scheme is shown on *Figure 1 Site Location*.

3.2.3 The entire land-take requirement for the solar farm site within the planning boundary is approximately 2.9 hectares (ha). Infrastructure will not be located across the full planning boundary, specific landtake requirements are in paragraph 3.2.10.

3.2.4 The solar scheme will be made up of approximately 2,256 solar panels. Individual PV solar panels will be arranged in module units typically made up of around 4 x 8 panels one above another in a landscape orientation on a mounting structure. The mounting system will be metal frame structures, which are expected to be anchored to the ground using piles. At this time there is no expectation of requirement for concrete foundations.

3.2.5 Solar panels will be installed in multiple rows with six string inverters in various locations on the underside of the arrays (See Figure 2 of the Noise Assessment report for locations). The inverter converts the solar current from Direct Current (DC) to Alternating Current (AC). The inverters are in turn connected via underground cable to the client substation.

3.2.6 Access to the site will be along Hafod House Farm Lane from Hafod Road. Hafod Road connects at its southern end to the B5426 Bangor road, which is located on 200m from junction 2 of the A483.

3.2.7 With a typical running width of 3.5m, the new track will accommodate all articulated loads and construction machinery through to the construction compound and into the site. see *Figure 3 Indicative Access Track Cross Section*.

3.2.8 A temporary construction compound will be required for the construction phase only, the location of which is adjoining the site track from the Hafod House Farm Lane through to the main development site. The compound will be required to provide materials and plant storage, some parking and welfare facilities during the construction phase. Following the construction phase, this compound will be removed and the area fully reinstated to its previous condition.

3.2.9 See the Hafod Road Solar Scheme Design and Access Statement for an understanding of the design and constraints parameters that have informed the evolution and final arrangement of the proposed scheme.

3.2.10 In summary the approximate footprint of the scheme is 6543.6sqm (0.65ha).

3.3 Construction Phase

Construction Programme

3.3.1 An indicative installation timetable is included in Table 2. The installation programme may potentially be affected by weather conditions and the availability of plant and materials but it is anticipated that the overall construction period will last approximately 16 weeks, with some elements of the construction activities overlapping.

Table 2 – Indicative construction programme

Work	Wk 1	Wk 2	Wk 3	Wk 4	Wk 5	Wk 6	Wk 7	Wk 8	Wk 9	Wk 10	Wk 11	Wk 12	Wk 13	Wk 14	Wk 15	Wk 16
Enabling works																
Delivery of plant and equipment																
Creation of access track																
Delivery of aggregate for access track/compound																
Concrete for foundations																
Temporary fencing																
Site accommodation/welfare																
Solar Array Construction																
PV panels delivery																
Delivery & erection of frames																
Solar panel installation																
Inverters/transformers																
Cable trenching																
Electrical connections AC & DC																
Switchgear and housing																
CCTV																
Commissioning & testing																
Fencing																
Site Clearance																
Removal of site welfare																
Removal of temporary fencing																
Removal of plant & equipment																

Site Tracks and Access

3.3.2 During construction all heavy commercial vehicles will approach the site from the A483, and will access the site from Hafod House Farm Lane.

3.3.3 A new track will require laying, which would remain in situ for the duration of the development to allow continued access for operation & maintenance vehicles. A typical cross-section of the proposed track is included in Figure 3.

3.3.4 Sediment control measures will be deployed during the works to ensure minimal impact to any on-site drainage ditches, where necessary. The draft Construction Environmental Management Plan (CEMP) submitted with this application includes pollution prevention measures.

Temporary Construction Compound and Fencing

3.3.5 The construction compound will cover approximately 600sqm in total and will be utilised solely for the duration of the construction phase. The location is shown in Figure 2. The construction compound will be temporarily surfaced as required using hardcore over a geotextile membrane, or other proprietary temporary surface matting, and fenced for security purposes. It will accommodate areas for the storage of plant and materials, as well as temporary site cabins and welfare facilities.

3.3.6 During the early phase of installation, temporary fencing may be located around other aspects of the site in order to ensure public protection from excavated areas and to secure on-site machinery and equipment.

Solar Panel Design and Mounting System

3.3.7 It is proposed that high quality poly-crystalline silicon photovoltaic modules or similar would be installed at the solar farm, harnessing the diffuse nature of light and direct sunlight. The solar cells are expected to be dark blue/black in colour and the panels would have an anti-reflective coating to maximise light absorption and minimise glare or reflection.

3.3.8 The final selection of the specific PV panels will depend upon sustainability criteria, panel availability, cost and commercial preference at the time of site procurement, if permission

is granted. A drawing of a panel is included in *Figure 4 Typical Mounting System* and following is an illustration of a typical solar panel:

Plate 1: Typical Solar Panel



3.3.9 The final design of the module units, rows and arrays will depend on the modules selected and detailed design of the scheme. However, in general the individual panels are expected to be arranged in module units comprising 4 panels in landscape orientation, one above the other, by 8 panels wide, joined together by the mounting frame, with multiple module units connected to form rows or arrays. Each row would be elevated above ground on the mounting frame, with the bottom (southern) edge at a height of 0.6m above ground level and the top (northern) edge at a height of 2.2m (depending on site specific ground conditions). The module units would be orientated south, and are expected to have an inclination/angle of22 degrees in order to optimise the installed capacity within the available site.

3.3.10 The metal mounting frame would be installed on piles across the site, as demonstrated in *Figure 4.* The piles are driven into the ground up to a depth of 1.5m using a hydraulic ram, although depths may differ slightly depending on ground conditions. It is unlikely that concrete foundations for the mounting frames will be required. The construction piling process for the entire site is expected to take no more than three weeks. Following is an illustration of a typical metal mounting system:

Plate 2: Standard Metal Mounting Frame



3.3.11 The mounting frames are usually fabricated from extruded aluminium, and the piles will be galvanised steel.

Inverters and Substation

3.3.12 Series of solar panel arrays are connected to a string inverter. The string inverters are in turn connected to the client substation, located as shown on Figure 2.

3.3.13 The client substation will be housed in a single prefabricated container, approximately 12.2m long, 2.5m wide and 2.9m high, raised upon metal feet and located upon a concrete plinth. See *Figure 5 Client substation*.

3.3.14 The client substation will be connected to the DNO substation (*Figure 6 DNO substation*) via a short length of underground cable, whereby the generated renewable energy is exported to the local distribution network.

Cabling

3.3.15 Cabling will be supported by the mounting structure along the back of each row of panels and will run underground between rows to the client substation. The client substation Will connect via underground cable to the DNO substation.

3.3.16 Underground cables will be laid in a trench at a depth of no greater than 1.0m, specifically dug for this purpose and reinstated once construction of the solar farm is completed. The specification for the cable trench is in accordance with the DNO requirements. *Figure 7 Cable Trench Cross Section* demonstrates the indicative cable trench designs for the on-site cabling arrangements throughout the development site.

Fencing and Security Measures

3.3.17 Appropriate security for the site during operation will be required to protect the public from exposure to the dangers of electrical equipment. Accordingly, a security fence will be installed around the site in which the PV arrays and other site infrastructure are located. Fencing will be approximately 3m in height and is expected to consist of metal poles and powder-coated steel mesh as shown on *Figure 8 Security Fence, Gate and CCTV Camera*. There will be two securely locked gates in the fence, to allow access for maintenance vehicles, operatives and the landowner.

3.3.18 The fencing will be installed on piled ground posts, with some occasional concrete footings for anchoring of the structure.

3.3.19 Gaps underneath the fence will be allowed on occasions around the site perimeter fence to allow small mammals to enter/exit the site area.

3.3.20 Infrared CCTV cameras, coloured green if required, will also be installed around the site. These will be mounted at a height of 2.8m on posts at locations within the security fence. Their locations will be agreed with a security expert prior to installation and will be positioned solely to look inwards towards the solar site and will be incapable of viewing any private residences.

3.3.21 There will be no security lighting as the security cameras are motion activated infra-red cameras to ensure security and safety.

Site Reinstatement and Habitat Improvements

3.3.22 Following completion of the construction works, the temporary site compound and storage area will be removed and the land returned to its current usage. Any trenches dug for cabling purposes will be back filled and reinstated.

3.3.23 Any temporary track way matting, temporary fencing etc. used during construction would be removed and the land reseeded with a grass seed mix or allowed to reinstate to its former condition as appropriate. The permanent access track to the DNO substation will be retained and allowed to grass over.

3.3.24 The whole site will be cleared of contractors' materials, plant and equipment, and waste materials associated with the solar farm. Areas of ground affected during the construction will be reinstated with topsoil and reseeded as necessary. In addition, improved habitats for biodiversity and site screening will be delivered in accordance with the specifications sets out in the Ecological Mitigation and Enhancement Statement and the Landscape and Visual Assessment.

Construction Noise

3.3.25 On account of the remote location of the proposed scheme and the short duration of construction activities, potential construction noise levels are not anticipated to breach statutory thresholds and there will be no incidence to residential amenity in the local area. Please see Noise Report for further details.

Vehicle Movements during Construction

3.3.26 Based on experience of similar developments, indicative estimates of the likely heavy goods vehicle loads associated with construction and reinstatement of the development have been estimated as a worst-case. The expected vehicle movements and proposed traffic management measures are included in the outline CTMP submitted with this ER as part of the planning application.

3.4 Operational Phase

Site Operation

3.4.1 The solar farm encompasses no moving parts or obtrusive features during operation; it is in essence a static development that quietly and efficiently will generate power from the sun.

3.4.2 Maintenance of the solar array will comprise of the following activities:

- Supplementary grass cutting (if sheep grazing does not suffice to keep grass sufficiently short);
- Reading of the electricity meter; and
- Replacement of any damaged panels (rare) and washing of panels (typically twice a year). Any cleaning of panels would employ de-ionised water that would not damage the environment.

3.4.3 As there will be no waste produced during the operational phase of the solar farm, no on-site waste storage or waste collection is required during the operational phase.

3.4.4 Given the requirements for operation and maintenance, traffic generation during the operational phase will be minimal.

3.4.5 The site will be securely fenced and monitored with security cameras in order to prevent unauthorised access and to ensure public safety. There will be no security lighting on site, in order to minimise the impact on wildlife and avoid effects to visual amenity.

Operational Noise

3.4.6 Due to the remote location of the proposed scheme and very limited operational noise (in proximity to the inverter units) only during daylight hours levels, the scheme will be operated without incidence to residential amenity. Please see Noise Assessment Report.

Monitoring and Performance

3.4.7 The solar farm installation will be designed to be operated remotely with only occasional visits for operation and maintenance purposes. A visual inspection of the system is expected to be carried out twice a year, and the arrays will be cleaned with de-ionised water as necessary. Periodic testing of the systems will occur in line with statutory requirements and the operator's own procedures. Throughout the operational period of the solar farm the output will be remotely monitored to ensure that the arrays are performing as they should.

3.4.8 In order to ensure the effectiveness of the solar farm for energy generation across its lifetime, the applicant will put in place an Operation and Maintenance (O&M) contract with

providers in the region. The essential elements of the O&M contract are likely to entail the following:

- Ensure only qualified personnel carry out O&M activities;
- Procure and make available materials (including spare parts), electricity supplies and communications requirements at the site in order to ensure the ongoing effective operation and control of the solar scheme;
- Monitor the solar scheme for its safety, performance and production in order to keep the scheme operational with the best possible performance;
- Make good any repairs or replacements to components of the scheme within a reasonable timeframe; and
- Be responsible for the care and security of the site in order to protect the on-site solar infrastructure and ensure public protection.

3.5 Decommissioning Statement

3.5.1 PV panels typically have a design life of around 35 years and the scheme would be operated for as long as the planning permission allows up to this limit.

3.5.2 Following the operational phase, the operator would either seek to repower the site (entailing new generating infrastructure) through a new planning permission, where national and local policy is still supportive of such schemes, or the scheme would be decommissioned and the site returned to its former use. The proposed development is designed such that it can be easily decommissioned and elements of the site infrastructure recycled. The value of the reusable or recyclable materials, including the high grade aluminium frames, will contribute significantly towards decommissioning costs. In addition, funds would be accrued by the operator to ensure that sufficient finance is available to cover the costs of decommissioning.

3.5.3 The scheme comprises numerous recyclable materials, including glass, semiconductor material, steel, aluminium and copper. When the solar plant reaches the end of its operational life, these component parts can be dismantled and recycled.

3.5.4 Decommissioning of the solar farm would proceed in reverse order to the installation process, as follows:

- The solar farm will be disconnected from the electricity distribution network.
- The following items shall be disconnected/dismantled and processed through an approved recycling/disposal operator:
    - PV modules
    - Site aboveground and underground electrical interconnection and distribution cables
    - Aluminium racking
    - Steel support posts
    - Electrical and electronic devices, including transformers and inverters
    - Fencing
- Access roads can remain on site should the landowner choose to retain them, or be removed and the gravel reused either on or off site.
- PV Module Collection and Recycling: recycling will recover a large percentage of the glass, and ferrous and non-ferrous metals used in solar modules. This process ensures compliance with the EU Directive 2012/19/EU on Waste Electrical and Electronic Equipment (WEEE) and The Waste Electrical and Electronic Equipment Regulations 2013 (as amended).
- Cabling: the cabling is installed underground and it is preferable to avoid disturbance and environmental impacts through leaving it in situ.
- Racking Structure Removal and Recycling: The racking structure consists of aluminium horizontal base rails and steel posts. All of these materials can be recycled and/or reused. Removal of the aluminium racking is straightforward, with simple primary fixings. The steel posts are pile driven and can be extracted quickly and safely.
- Substations: the concrete base will be demolished and substations removed.

3.5.5 The ecological management areas would be retained on an ongoing basis in the interests of continuing biodiversity enhancement.

3.5.6 Decommissioning will require up to 6 weeks to complete, at which stage agricultural practices will be able to resume across the site area.

3.6 Safety

3.6.1 Prior to commencement of the construction works the appointed Contractor will be required to prepare a construction phase Health and Safety Plan to integrate with the pre-construction information prepared by the Applicant.

3.6.2 The Health and Safety Plan will address the safety of local residents and the public. Such a plan is likely to explain that the construction site is to be secured when it is not manned, that excavations are secured against potential intrusion by the public, and the public is kept at a safe distance during the solar farm installation.

3.6.3 Emergency services vehicle access will be addressed within the Plan drawn up between the Contractor and the Applicant. The Contractor shall liaise with all of the Emergency Services prior to works commencing to ensure that an approved emergency plan is in place and access for emergency services vehicles will be maintained at all times during the construction period. If mobile phone communications are to be used the Contractor will be required to verify that a good signal is available at all times.

Appendix 1 – WREXHAM COUNTY BOROUGH COUNCIL SCREENING OPINION

Cyngor Bwrdeistref Sirol Wrecsam/ Wrexham County Borough Council
Neuadd y Dref, Wrecsam. LL11 1AY
Guildhall, Wrexham. LL11 1AY
www.wrecsam.gov.uk www.wrexham.gov.uk
Cyfnewid Testun/Text Relay: 18001

wrexham COUNTY BOROUGH COUNCIL
CYNGOR BWRDEISTREF SIROL wrecsam

Lesley Rice
Dulas Ltd
Unit 1 Dyfi Eco Park
Machynlleth
Powys
SY20 8AX

Eich Cyf/Your Ref	
Ein Cyf/Our ref	SO/2024/1002
Dyddiad/Date	25 October 2024
Gofynner am/Ask for	Nick Atkinson
Rhif Cyswllt/Contact No	[redacted]
E-bost/E-mail	[redacted]

(Sent by e-mail)

Dear Ms Rice,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

PROPOSAL: COMMUNITY SOLAR FARM

REQUEST FOR UPDATED SCREENING OPINION UNDER TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (WALES) REGULATIONS 2017

LOCATION: LAND AT HAFOD ROAD, HAFOD, RUABON, WREXHAM, LL14 6HF

I refer to your request for a Screening Opinion in respect of the above in accordance with the provisions of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017.

Having considered the details submitted as well as advice contained within Welsh Office Circular 11/99 I can confirm that the development will not need to be subject to an Environmental Impact Assessment. A copy of the screening opinion is enclosed with this letter.

Yours faithfully,



Nick Atkinson
Lead Officer, Development Management
Economi a Chynllunio
Economy and Planning

Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.
We welcome correspondence in Welsh. We will respond to any correspondence in Welsh and this will not lead to any delay.

STAGE 1 – INITIAL EIA SCREENING ASSESSMENT

1	Case Details	
A	Appeal case reference	
	n/a	
B	LPA case reference	
	SO/2024/1002	
C	LPA	
	Wrexham County Borough Council	
D	Appellant/Applicant	
	National Trust	
E	Site address	
	Land at Hafod Road, Hafod, Ruabon, Wrexham, LL14 6HF	
F	Brief description of development	
	Solar farm	
G	Site area of development/works/new floorspace (as appropriate), i.e. m2 or hectares (Ha)	
	4.26ha – only 1/3 to be developed for the solar array.	
H	Approval of reserved matters or conditions? If yes, state which one	
	No	
I	If Yes, enter the description of development subject of the related planning permission	
2	**EIA Screening Details**	
2A	**Schedule 1**	
	Is the project Schedule 1 development as described in Schedule 1 of the EIA Regulations?	No
	If Yes, under which description of development i.e. Nos. 1 -21? Go to Section 8 and tick Recommended Action 8A/B 'EIA Required'. If No, consider whether project is 'Schedule 2' development below in part 2(B).	
2B	**Schedule 2**	
(i)	Is the project listed as a description of development under Column 1 of Schedule 2 of the EIA Regulations?	Yes
	If Yes, note under which description of development in Column 1 of Schedule 2 i.e. paragraphs 1-12. If No, go to Section 8 and tick Recommended Action 8L 'EIA Not Required' as the project does not fall within the EIA Regulations i.e. it is not Schedule 2 development *and is not EIA development. Complete sections 3-5.*	
	3. Energy industry	

(ii)	Does the project change or extend development described in paragraphs 1 to 12 of Column 1 of schedule 2, where the change or extension may have significant adverse effects on the environment?	No
	If Yes, provide reasons for your answer below. Proceed to point (iii).	
	Choose an item.	
(iii)	Is the project located wholly or partly within a 'Sensitive Area' as defined by Regulation 2 of the EIA Regulations?	No
	If Yes, state which area and proceed to Section 3, no need to consider thresholds/criteria. If No, proceed to point (iv) below.	
(iv)	Are the applicable thresholds/criteria in Column 2 exceeded / met?	Yes
	If Yes, note which applicable threshold/criteria and proceed to Section 3. If No, proceed to Section 8 and tick Recommended Action 8L 'EIA Not Required' as the project does not fall within the EIA Regulations i.e. it is not Schedule 2 development *and is not EIA development. Complete sections 3-5.*	
	The area of the development exceeds 0.5ha.	
3	**LPA / Welsh Ministers' Screening**	
	All applications including reserved matters/conditions	
(i)	Has the LPA issued a Screening Opinion (SO)?	Yes
(ii)	Have the Welsh Ministers issued a Screening Direction (SD)?	No
(iii)	If Yes to either, is a copy of the SO/SD on the file? Note which one.	Choose an item.
(iv)	If Yes, is the SO/SD positive i.e. EIA is required?	No
4	**Reserved Matters/Conditions Applications Only**	
(i)	Was the original planning permission subject to EIA screening?	N/A
(ii)	Was a SO/SD issued for the original planning permission?	N/A
(iii)	If Yes, is a copy of the SO/SD for the original planning permission on file?	N/A
5	**Environmental Statement (ES)**	
	Has the applicant/appellant supplied an ES for the current or previous (if reserved matters or conditions) application?	No

Is a detailed screening assessment (Sections 6) required?

If Yes has been answered in response to either 2B(iii) or 2B(iv), send to relevant team to undertake detailed screening assessment.

If No has been answered for both questions, or the questions are not applicable, proceed to Section 7.

7	Options	
Assessment	**Recommended Action**	✓
Schedule 1 development	**Letter 1.** Issue direction stating EIA Required	
Schedule 1 development – appeal is at an advanced stage	**Letter 2.** Issue direction stating EIA Required	
Project does not fall within the EIA Regulations as either: (a) it is listed within the descriptions of development Column 1 of Schedule 2 of the EIA Regulations but does not meet relevant threshold criterion; or (b) it does not fall within the categories of development in Column 1 of Schedule 2 of the EIA Regulations.	**Letter 3.** EIA Not Required - Issue direction stating either: (A) project listed within descriptions of development in Column 1 of Schedule 2 of the EIA Regs but does not meet relevant threshold/criterion; or (B) project does not fall within the categories of development in Column 1 of Schedule 2 of the EIA Regulations.	✓

Sign-off	
Signature	 Nick Atkinson – Lead Officer (Development Management)
Date	23rd October 2024

STAGE 2 – DETAILED EIA SCREENING ASSESSMENT

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects likely to be significant?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
CRITERION 1. CHARACTERISTICS OF DEVELOPMENT		
Question 1(a) Size and design of the Development		
Will construction, operation or decommissioning of the Project involve actions which will cause physical changes in the locality (topography, land use, changes in waterbodies, etc.)?	Yes – the land is presently an agricultural field, which appears to be in active use. The land appears to be Grade 3b agricultural land which is of modest quality and not Best and Most Versatile. The development would ultimately result in physical changes to the field during the construction and operational phase – although it would still be possible to be used for grazing. Following the de-commissioning of the site, the land would be returned back to its current condition and so any changes would not be permanent or irreversible. The landscape would be altered by the proposal, however the impact of that change would not likely be significant and would not be	Significant effect **unlikely**

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	permanent. As such, it would be possible to assess the appropriateness and impact of this through a suitably detailed Landscape and Visual Assessment, and does not require the submission of an Environmental Statement.	
Question 1(b) Cumulation with Existing and/or Approved Development		
Are there any other factors which should be considered such as: • consequential development which could lead to environmental effects? • the potential for cumulative impacts with other existing or planned activities in the locality? • any plans for future land uses on or around the location which could be affected by the project? • transfrontier impacts?	No. The development site is located close to, but outside of the settlement of Rhosllannerchrugog and Johnstown (and the Johnstown Industrial Estate). Due to the nature of the solar development proposed, there are no existing uses within either of these locations that would conflict with or create cumulative impacts with the current proposal. The site is located in relatively close proximity to the Haford Enovert Landfill site, which has greater sensitivity in this regard. However, the development and operation of a solar farm is unlikely to result in any	n/a

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	discernible impacts upon the landfill site, or existing environmental ground conditions associated with this existing facility.	
Question 1(c) Use of Natural Resources, in particular land, soil, water and biodiversity		
Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or in short supply?	Yes. The application site is a parcel of agricultural land which appears to be used for arable farming rather than as grazing. Whilst there is potential for the site to hold ecological and biodiversity value, this is not considered to be significantly sensitive or rich, and could be fully assessed through a standard ecological survey and biodiversity matrix without the need for an Environmental Statement. However, due to the nature of solar farms, the land could still be used for agricultural purposes (albeit grazing rather than arable) throughout the operational phase of the development, and would be returned to its previous use upon the	Significant effect **unlikely** The quantum of agricultural land to be lost is not significant, nor permanent. Additionally, the land could still continue to be used for agricultural purposes throughout the operational phase of the development. As such, the effects would not be significant.

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	decommissioning of the site – thus the impacts would not be permanent.	
Question 1(d) Production of Waste		
Will the Project produce solid wastes during construction or operation or decommissioning?	Yes. There is potential for solid waste to be produced during construction and also decommissioning/disposal of the solar panels. It is unlikely waste would be produced during the option of the development. It can be reasonable expected that a high degree of recycling of waste arising from decommissioning, notably solar panels and associated electronic equipment, would take place. The amount of waste produced is unlikely to be significant in EIA terms given the nature and scale of the development and could be fully assessed through the usual planning application processes.	Significant effect **unlikely**
Question 1(e) Pollution and Nuisances		
Will the Project involve use, storage, transport, handling or production of substances or materials which could be harmful to human health or	No.	Significant effect **unlikely.**

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
the environment or raise concerns about actual or perceived risks to human health?	No evidence or information has been presented or available at this time to suggest any harmful substances would be used, it is not considered likely that the project as proposed at this stage would likely involve substances that would be significantly harmful to human health or the environment by virtue of being a renewable energy project.	It is not considered that there would be any significant effects in regard to substances or materials stored, handled, transported or produced as a consequence of the proposal submitted being for a solar farm development.
Will the Project cause noise and vibration or release of light, heat energy or electromagnetic radiation?	Yes. There is likely to be noise, dust and vibration omissions generated by the proposal which has the potential to impact residents and businesses in the nearby settlements, but more closely the Hafod House care Home. It is unlikely that there would be any such effects to Johnstown or Rhosllannerchrugog due to the separation distance that exists from the site to both settlements. However, such impacts would likely only arise during the construction phase of the development and not during the operational phase. Furthermore, such measures could	Significant effect **unlikely**

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	be fully assessed by standard environmental assessments as part of the usual planning application process, and do not warrant the submission of an Environmental Statement for the impacts to be assessed. Furthermore, suitable controls could be achieved through the construction phase through the submission and consideration of a suitably designed CEMP, either prior to determination or secured through condition as further mitigation. The same relates to controls on hours of construction works and also conditions restricting external lighting.	
Will the Project release pollutants or any hazardous, toxic or noxious substances to **air**, or lead to risks of contamination of **land** or **water** (including surface waters, groundwater, coastal wasters or the sea)?	Yes. There is potential for some pollutants, notably dust, during construction. However the impacts are likely to be localised and not significant in EIA terms. The use of best practice techniques would also assist in minimising such impacts.	Significant effect **unlikely**
Question 1(f) Risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge		

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
Will there be any risk of major accidents and/or disasters during construction or operation of the development?	There is a risk of accidents during construction and decommissioning works, however it can be reasonably expected that construction contractors would employ best practices to minimise the risk. Furthermore, these impacts can be mitigated through a CEMP and appropriate controls for decommissioning to minimise any such impacts. Due to the nature of the proposal and with mitigation secured through conditions and a CEMP, it is unlikely that the risk of major accidents would be significant, nor warrant the submission of an Environmental Statement.	Significant effect **unlikely**
Question 1(g) Risks to Human Health (for example due to water contamination or air pollution)		
Will there be any risk to human health during the construction and/or operation of the development	Yes. There is a small potential for dust arising from the development to adversely impact upon the health of residential properties in the vicinity of the site (specifically Hafod House Care Home), or to users of the surrounding highway network during	Significant effect **unlikely.** The risk is low and with further mitigation secured through detailed assessments, management plans and imposition of conditions, it is considered that there would be no significant effects likely to arise.

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	both construction and decommissioning phases. However, this would only be for a limited period of time, and the employment of dust management techniques, in addition to the submission of a suitably detailed Construction Environmental Management Plan, would help to minimise any significant risk of dust escaping from the site. This limited risk does not warrant the submission of an Environmental Statement.	
CRITERION 2. LOCATION OF DEVELOPMENT		
Question 2(a) Existing and Approved Land Use		
Will the Project result in social changes, for example, in demography, traditional lifestyles, employment?	No.	n/a
Are there any routes or facilities on or around the location, which are used by the public for access to recreation or other facilities, which could be affected by the project?	There is a Public Right of Way which runs adjacent to the site, immediately to the north which provides access to the National Trust managed woodland and War memorial. This would enable views into the northern part of the site, but not in its full entirety. Whilst the development would alter the outlook for users of this Public Right of Way	Significant effect **unlikely**

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	for a short section of its length, the extent of that impact would not be significant, and could be appropriately mitigated through the submission of a standard landscaping scheme at the planning application stage, and does not warrant the submission of an Environmental Statement.	
Are there any transport routes which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	None known. The site is located between the A483 and the B5426, with Hafod Road running to its immediate west. There is no reason to suggest that safe and appropriate access could not be achieved during the construction phase. The nature of solar farm developments are such, that it is envisaged that limited vehicle movements would be generated during the operation phase of the development. However, this would be able to be fully assessed through standard transport information submitted as part of a normal planning application, and does not warrant the submission of an	n/a

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	Environmental Statement to be fully assessed.	
Is the project located in a previously undeveloped area where there will be loss of greenfield land?	Yes. The site is presently agricultural land which appears to be in productive and active use as such. It is not however subject of any National or Local Landscape designation or protection. However, the use of the site for a solar development would not require the loss of this land in its entirety during the operational phase, with agricultural grazing still being possible. Furthermore, the loss of the land would be time-restricted and so not permanent (with a condition requiring the restoration of the land back to its former use following the cessation of electricity generation). As such, the impact of the loss of the greenfield land is not considered to be significant for the purpose of this EIA assessment.	Significant effect **unlikely.** The potential impact upon greenfield land would overall be negative given the site is rural and located outside of any settlement boundary and within an area of open countryside. However, due the limited extent of built development associated with solar developments, and given their temporary nature (albeit in excess of 20 years), the extent of this impact is not permanent would be reversible subject to the imposition of an appropriate decommissioning and restoration condition, and also time limited. As such, the proposal is unlikely to result in significant or permanent environmental effects in this regard.

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	Whilst the application site is relatively large, the applicant has confirmed that only 1/3 of the site is proposed to be used for the solar array, which would reduce this impact.	
Are there any areas on or around the location occupied by land uses which could be affected by the project, particularly sensitive land uses e.g. hospitals, schools, places of worship, community facilities?	No. There are a few residential priorities relatively close by, and Hafod House Care Home is located in very close proximity. Also the site is located near to a National Trust Managed woodland and War Memorial to the north. However, there would be no intervisibility between any dwellings, or the woodland and the application site itself. Furthermore, beyond the construction and decommissioning stages of the development (which as noted previously could be controlled), the operational phase is unlikely to result in any discernible or significant impacts upon any	Significant effect **unlikely**

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	residential dwelling or the Care Home.	
Question 2(b) Relative Abundance, Availability Quality and Regenerative Capacity of Natural Resources in the Area and its Underground		
Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project?	Yes. The site is located close to the Hafod Hall Country Park SAC, which is a local recreational site of interest. In addition, the site is close to the Aberdefyn Nature Reserve and a National Trust managed woodland and War memorial. However, the site is located at a sufficient distance away from the Country Park and the Nature Reserve, and with no direct views or intervisibility to it so as to ensure that there would be no significant impacts upon this locally important site. Similarly, there would be no direct views available from the site to the War Memorial Woodland, beyond access obtained using the Public Right of Way.	Significant effect **unlikely**

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	Construction and decommissioning works can be controlled and mitigated through a CEMP to ensure that there is no adverse or significant impact during this period to any of these locally important sites; whilst the operational phase of a solar farm is unlikely to give rise to any harmful or significant impacts upon the SAC, the Nature Reserve or the woodland. As such, the development would not require the submission of an Environmental Statement in this regard.	
Question 2(c) Absorption Capacity of the Natural Environment		
Are there any other areas on or around the location which are important or sensitive for reasons of their ecology, or are used by protected, important or sensitive species of fauna or flora, which could be affected by the project?	Yes. The site is not subject to any statutory nature conservation designations. However, a SAC and a Nature Reserve are located within reasonably close proximity to the site at Hafod Hall Country Park and Aberdefyn Nature Reserve. The operational phase of the development is unlikely to give rise	Significant effect **unlikely**

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	to any adverse or significant impacts upon the SAC or the Nature Reserve, with appropriate avoidance measures able to be secured through the imposition of planning conditions. Any impacts that may arise through the construction or decommissioning phases of the development are also able to be controlled through a CEMP and mitigation plantings to reduce the potential through the usual planning application process. As such, this does not require the submission of an Environmental Statement.	
Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?	No	n/a
Are there any areas or features of high landscape or scenic value on or around the location which could be affected by the project?	Yes. The site is not within a statutory or locally designated or protected landscape. The site is located within close proximity to the Hafod Hall Country Park, although there would be no direct views available between the two due to surrounding topography and existing trees and vegetation.	Significant effect **unlikely**

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	Therefore, whilst the site is not entirely screened from public view, it would not likely result in any significant impacts upon the Country Park. As such, it would be entirely possible to assess the impact of the proposal through the submission of a suitably detailed Landscape and Visual Impact Assessment as part of the standard planning application process and does not require the submission of an Environmental Statement.	
Is the project in a location where it is likely to be highly visible to many people?	Partially. The site is partially self-contained visually by surrounding topography and trees/vegetation, but it is not entirely screened from public view. Views are limited to users of the adjacent Public Right of Way, and from road users along Haford Road and the B5426 public highway.	Significant effect **unlikely**

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	Although surrounded by hedgerows in these locations, views still exist into the field when they are cut and managed. However, these views are relatively localised, short ranging, and brief. There are no longer ranging views of the site in the wider landscape. The impact of the development is not considered to be significant in this regard. Furthermore, the impact would be able to be fully assessed through the submission of a Landscape and Visual Impact Assessment and a Glint and Glare Assessment. Additionally, the impact could be lessened by a scheme of landscape plantings informed by the findings of both surveys as further mitigation. As such, an Environmental Statement is not required to assess this impact fully.	
Are there any areas on or around the location which are densely populated or built-up, which could be affected by the project?	Yes. The site is close to the settlement of Rhosllannerchrugog and Johnstown.	Significant effect **unlikely.** The proximity of the Rhosllannerchrugog to the application

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	However, the site and the settlements are separated by the Johnstown Industrial Estate, and a small expanse of open countryside - both of which would act as a visual buffer meaning that no direct views exist from either settlement to the application site. There would be no visual intervisibility between the development and either settlement, and beyond the construction and decommissioning phases of development (which have been discussed above), the nature of the proposal means that the operational phase is unlikely to result in any discernible impacts to the settlements. The site is partially screened from wider public views in most directions by surrounding vegetation and topography beyond the public highway network.	site is noted. However, a solar development is not considered to be an inappropriate or incompatible use per se. As such, the potential environmental effects of a solar farm development as proposed are not considered significant in this respect, and do not trigger the need for an Environmental Statement.

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	Whilst the visual impact of the development upon the character of the surrounding area and landscape is likely to be the main consideration in any forthcoming planning application, this would be possible to be assessed through the submission of an appropriately detailed Landscape and Visual Impact Assessment and also a Glint and Glare Assessment through the normal planning application process. This does not require the submission of an Environmental Statement for this impact to be fully assessed.	
Are there any areas or features of historic or cultural importance on or around the location which could be affected by the project?	See above in respect of Hafod Hall Country Park, and the National Trust Woodland and War Memorial. Impacts considered unlikely to be significant in EIA terms.	Significant effect **unlikely**
Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	The site is a greenfield parcel of previously undeveloped land which is unlikely to have any potential for land contamination issues. The site is located in relatively close proximity to the Haford Enovert Landfill site, which has greater	Significant effect **unlikely**

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	sensitivity in this regard. However, the development and operation of a solar farm is unlikely to result in any discernible impacts upon this site or existing environmental ground conditions. Furthermore, it would be possible to impose planning conditions to require the site to be investigated for contamination prior to commencement of development, or for works to cease and remediation to be developed should any unexpected contamination arise. As such, it is considered that the development would not likely result in adverse impacts in this regard that would require the submission of an Environmental Statement.	
Is the project location susceptible to subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions, which could cause the project to present environmental problems?	The site is located within an HSE consultation zone and also within a Radon Gas and Coal Assessment area.	Significant effect **unlikely**

5	Detailed Screening Questions	
Questions to be considered	**Yes/No/Unknown – provide description**	**For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u>?** **State any features of the development or measures to be used to avoid or prevent what might otherwise have been significant adverse effects.**
	As such, whilst it is possible that part or all of the site may have stability issues, this would be able to be fully assessed through the standard planning application process with appropriate assessments submitted for each to be considered by the relevant consultees. Whilst the site area is large, the applicant has confirmed that only 1/3 would be used for the solar array, meaning that the layout could easily be designed or amended to take account of these constraints should the site be effected. As such, given the nature of the solar farm development, and based upon the information presently known to date, it is considered that this impact is unlikely to be significant and does not require the submission of an Environmental Statement.	
Has there already been a failure to meet environmental quality standards that is relevant to the project?	No	n/a

Statement of reasons – insert into Screening Direction

The development would give rise to impacts arising from construction and decommissioning as well as landscape impacts whilst in situ/operation. However, the impacts are considered to be localised in nature and not significant in EIA terms.

6	Outcome of assessment	
(ii)	If a SO/SD has been provided do you agree with it?	N/A
(iii)	Is EIA required?	No

Outcome	Action	✓
Schedule 2 development – threshold exceeded/ criterion met or Sensitive Area but **not** likely to have significant effects on the environment	Issue direction stating EIA **Not** Required	✓
Schedule 2 development – threshold exceeded/ criterion met or Sensitive Area **and likely** to have significant effects	Issue direction stating EIA Required	
Project does not fall within the EIA Regulations as either: (a) it is listed within the descriptions of development Column 1 of Schedule 2 of the EIA Regulations but does not meet relevant threshold/criterion; or (b) it does not fall within the categories of development in Column 1 of Schedule 2 of the EIA Regulations.	EIA Not Required - Issue direction stating either: (A) project listed within descriptions of development in Column 1 of Schedule 2 of the EIA Regs but does not meet relevant threshold/criterion; or (B) project does not fall within the categories of development in Column 1 of Schedule 2 of the EIA Regs	
Schedule 2 development but effects not clear at this stage – file to be reviewed at a later stage	No action – review when appropriate i.e. on receipt of new information/case progress	

Name and Job Title of Assessor	Nick Atkinson, Lead Officer (Development Management)
Date of Assessment	23/10/2024
Signing Manager	Matthew Phillips Head of Service Planning Development Management 
Date of Sign Off	24/10/2024

Appendix 2 - Wrexham County Borough Council Pre-application advice responses

Cyngor Bwrdeistref Sirol Wrecsam/ Wrexham County Borough Council
Neuadd y Dref, Wrecsam. LL11 1AY
Guildhall, Wrexham. LL11 1AY
www.wrecsam.gov.uk www.wrexham.gov.uk
Cyfnewid Testun/Text Relay: 18001

wrexham
COUNTY BOROUGH COUNCIL
CYNGOR BWRDEISTREF SIROL
wrecsam

Eich Cyf/Your Ref
Ein Cyf/Our ref ENQ/2024/1174
Dyddiad/Date 29 January 2025
Gofynner am/Ask for Nick Atkinson
Rhif Cyswllt/Contact No [redacted]
E-bost/E-mail [redacted]

Ms L Rice
EIA Co-Ordinator
Dulas Ltd
Unit 1 Dyfi Eco Park
Machynlleth
Powys SY20 8AX
(SENT BY E-MAIL)

Dear Ms Rice

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

PROPOSAL: Development of 1MW Solar Farm and Associated Infrastructure
LOCATION: Land adjacent to Hafod House Farm, Hafod, Ruabon, Wrexham, LL14 6HF

I refer to your recent enquiry for the above proposal. The response below is based on the information provided within your submission.

National Policy:

- Future Wales - The National Plan
- Planning Policy Wales 2024 Edition 12 (PPW)

Technical Planning Guidance Notes (TAN):

- TAN5 Nature Conservation and Planning
- TAN12 Design
- TAN18 Transport
- Technical Advisory Note (TAN) 24 – The Historic Environment.

Development Plan policies:

As you are aware from our subsequent correspondence, the Wrexham Local Development Plan (adopted in 2023) has recently been subject of an appeal to the High Courts.

The Court of Appeal judgement handed down on the 20th of December 2024 concluded that the Planning and Compulsory Purchase Act 2004 (the 2004 Act) does not impose a duty on a Local Planning Authority to adopt a Local Development Plan. It has the effect of overturning the High Court judgement of 29 November 2003, which had concluded to the contrary.

Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.
We welcome correspondence in Welsh. We will respond to any correspondence in Welsh and this will not lead to any delay.

The Wrexham Local Development Plan (2013-2028) (LDP) was adopted by Full Council on 20th December 2023. The judgement of the 20th December 2024 does not, by itself, alter the status of the LDP as 'the development plan', as defined in section 38(4)(c) of the 2004 Act. In accordance with section 38(6) of the 2004 Act, any planning applications or appeals must be determined in accordance with the development plan unless material considerations indicate otherwise. The LDP therefore remains adopted and therefore the starting point for the determination of planning applications until the Court orders to the contrary.

However, as I have confirmed to you, this position is likely to alter in the very near future, and there remains uncertainty regarding the status of the LDP in the medium to longer term, and whether or not this will remain as the Development Plan for the County Borough, and if not, what it will be replaced by.

As such, I am unable to provide you with a reliable policy basis against which any future application you may submit will be assessed, and therefore, I am unable to confirm for you whether or not any future planning application is likely to be supported by the Local Planning Authority at this time. Therefore, the advice contained within this response is limited to relevant material considerations/matters that you will need to address in any future submission.

Notwithstanding the above, I can confirm that the site is not presently designated as a solar local search area within the LDP. In this regard, I note the requirements of Policy RE2 (Renewable Energy Schemes) which notes the following:

'Proposals to generate energy from renewable energy and low carbon sources will be supported.

1. *Proposals for solar farms <10MW will be directed to the solar local search areas (LSA) identified on the proposals map.*
2. *Outside LSAs proposals for wind, solar, biomass, energy from waste, anaerobic digestion, hydropower and other renewable sources will be supported in appropriate locations.*

In assessing such proposals consideration will be given to the impacts of the development on the landscape, the number, scale, size, design and siting of the renewable installations and associated infrastructure, alone, cumulatively and in combination.'

In addition to addressing the aforementioned requirements, I would advise that justification for the siting of the development in this location and also the need for the proposal should be clearly set out and explained within a supporting planning statement. This should include confirmation of alternative sites that were considered, and why they were ultimately discounted.

Officer Comments

Landscape Impacts

The main consideration with any solar farm application is the potential impact of the development upon the character and visual appearance of the area, particularly given

such proposals are normally located in open countryside locations, such as this enquiry site.

The application site is presently an open, agricultural field. The site is not located within a landscape of any special designation, protection or sensitivity. Furthermore, I of the opinion that the site is reasonably visually constrained as a result of the surrounding trees, vegetation, topography and the existing boundary hedgerow, which results in the site having limited interconnectivity with the surrounding countryside and landscape.

However, developments for solar arrays do still have a high potential risk of resulting in harmful visual impacts to a locality and to the character of the wider surrounding countryside. In this instance, the site is located in close proximity and in a reasonably prominent location relative to the B5426 public highway and Hafod Road – although I accept that views into the site from gaps in the hedgerows are limited to a couple of sporadic locations.

In light of the above, it is possible that a solar scheme could be developed at the site, which has a limited visual impact, with many of the arrays and panels possibly being largely screened from view by this hedgerow. As such, it is possible that the main visual impact would therefore, arise from any associated buildings on the site, and also any perimeter fencing that would be erected.

In order to enable the Council to fully assess the visual impact of the proposal, any future application would need to be supported by a suitably detailed Landscape & Visual Impact Assessment, from appropriate viewpoints in the locality. In addition, the application would also need to be accompanied by a Glint and Glare Assessment for similar reasons.

In terms of the panels themselves consideration should be given to the use of dark panels, which are light absorbent to reduce the extent of glare that would arise. Furthermore, the height of the panels themselves should be kept to the minimum needed to generate electricity, in addition to keeping the number of other buildings or above ground structures and extent of hardstanding to an absolute minimum given the open countryside location of the site.

In terms of any perimeter fencing, I would not be supportive of high metal fencing in this location, due to the prominence of the site. Instead consideration should be given to the use of timber and wire deer style fencing, which would be more visually appropriate for the locality. This fencing should also be located so as to enable a scheme of landscape plantings and enhancement to take place – primarily along the boundaries of the site with the B5426 public highway and Hafod Road, which are most visually prominent to public views. This would help to further screen and soften the visual impact of the development. However, such plantings should be as well as, and not instead of, biodiversity net benefit measures, which I will cover later in this response.

Highways

Whilst it is noted that the B5426 is a busy public highway, it is likely that any significant highway impact arising from the development would be during the construction phase, rather than the operational phase.

As such, any future application you may submit should provide adequate data/information pertaining to the likely number and nature of vehicle movements during construction, and also during the operation of the site to enable the impact of the proposal on the highway network to be fully assessed in consultation with the Highway Authority. Any future application should be supported by a suitably detailed Construction Environmental Management Plan. This document should include information relating to construction hours, materials delivery times, but also include details of parking provision for contractors and vehicle compounds.

In addition, the CEMP will need to cover the following issues:

- Vehicle loads - Nuisance dust/emissions from vehicle load's being transported to/from site during the reclamation and construction phases.
- Nuisance dust - Nuisance dust from mud being deposited on the public highway during the reclamation and construction phases.
- On-site activities - Nuisance dust/emissions from on-site activities during the reclamation and construction phases.
- Details of the hours of construction.

I note your initial intention to utilise the existing field access, which would seem a logical and sensible option given the fall-back position that this represents for the existing and unrestricted agricultural use. This access point would clearly need to be widened and improved to enable use by construction traffic, and as such full details of the nature of the improvements, visibility splays available and turning provision within the site would need to be clearly demonstrated on the support suite of plans.

Unfortunately, it has not been possible to seek the views of the Highway Authority for the purpose of this enquiry. As such, it is strongly recommended that you engage directly with this key consultee prior to the submission of any future application, to establish the extent and nature of the information that would need to accompany any future application. The Highway authority can be contacted at: highwaysplanning@wrexham.gov.uk.

Trees and Landscaping

With the exception of the generic site layout plans you have submitted, I note that no detailed landscaping plans have been submitted with this enquiry, despite this representing an important consideration for any future application you may submit.

Should you proceed with the submission of a formal planning application, a detailed landscape plan will need to be submitted in support of the proposal, as this would not be appropriate to secure through condition post determination. This plan will need to contain details of the specific locations and species of plantings to be undertaken. The planting scheme will need to contain a mix of appropriate native and non-native species that will be resilient to future climate change, easy to maintain and provide appropriate habitat and green infrastructure corridors for the sites existing wildlife.

It appears unlikely from your submission, that any trees are required to be felled in order for this development to be delivered. However, should this be the case, please note that an appropriate Arboricultural Impact Assessment will need to be undertaken to assess the health and biodiversity value of any mature trees that would be lost. Furthermore, tree and hedgerow protection measures (including appropriate exclusion

zones during the construction phase) should also be included for any trees and hedgerows to be retained in the final submission.

In my opinion the existing trees and hedgerows presently forming the sites boundary treatment should be retained and also strengthened. As noted previously, this would help to soften the visual impact of the proposal and represents an opportunity for enhanced landscape features creating an overall higher quality final design.

This scheme should also be accompanied by a Landscape Ecological Management Plan, setting out how the landscape plantings will be managed and maintained throughout the lifetime of the development.

Ecology and Biodiversity Net Benefit

I can confirm that the entirety of the application site is not known to have any significant ecological sensitivity, nor provide discernible habitat for any protected species. However, it is noted that the site sits adjacent to a National Trust managed woodland and in close proximity to the Hafod Hall Country Park SAC and Aberdefyn Nature Reserve.

However, it is clear that any future application you may submit will need to be supported by an appropriately detailed Ecological Assessments of the site, to include appropriate mitigation measures as identified by the survey. Furthermore, any future application would need to demonstrate that Biodiversity Net Benefit was achieved across the entire site. This information would be require prior to the determination of any future planning application, and could not be secured through the imposition of a condition. The ecological assessment and biodiversity measures should also assess the impact of the development upon the adjacent woodland area, the nearby SAC, and the Aberdefyn Nature Reserve, including any mitigation measures as may be identified where within the assessment.

Site Constraints

It is noted that part of the site is located within a Minerals Buffer Zone where current LDP policies SP16 and MW1 apply. In particular, Policy SP16 protects such minerals from unnecessary sterilisation, unless the requirements of policy MW1 can be met where it can be demonstrated that:

i. the mineral does not merit extraction;
ii. the need for the development outweighs the need to protect the mineral;
iii. the mineral can be extracted before development commences;
iv. the development is temporary in nature and can be removed before the mineral is needed;
v. essential supporting infrastructure for the supply of the mineral would not be compromised.

As such, any future application you may submit will need to demonstrate how the proposal would not sterilise the potential for any future mineral extraction within the locality through the submission of an Assessment of the Mineral resource.

Furthermore, I note from a recent planning application at Hafod House Rest Home, that HSE confirmed the presence of a Gas Pipeline through that adjacent site. The

Council does not hold information relating to the full alignment and location of this gas pipeline, but it is possible that it will pass through or very close to the site in question.

As such, I would strongly recommend that you consult directly with both HSE and National Gas to ascertain if any such pipeline would affect this site and ultimately any future proposal, prior to the application being submitted. This is to include any associated buffer zones. This will also enable you to ascertain whether any assessments or information will be required to enable a positive consultation response to be received, or whether such a constraint would affect the final design and layout of the development – both of which would be preferable to ascertain prior to the submission of an application.

Flood Risk

The application site is not located within an area of increased flood risk, and the Council is not aware of any historic flood events having occurred at the site. As such, it is unlikely that flood risk will represent a constraint to the determination of any future application you may submit.

Notwithstanding the above comment, I would recommend that any future application you do submit is supported by a drainage strategy which demonstrates how surface water will be dealt with and drained efficiently so as to ensure that there is no increased risk of flooding to any surrounding land or onto any surrounding public highway.

Contamination

The site is a greenfield parcel of previously undeveloped land which is unlikely to have any potential for land contamination issues arising from past agricultural uses.

However, the site is located within close proximity to the Haford Enovert Landfill Site, which although regulated, is still a potential source of land contamination for the locality. As such, to negate any requests for additional information, or the imposition of conditions relating to ground contamination, it would be prudent for any future application to be accompanied by a Desk Based Contaminated Land Assessment, including any informed remediation measures where identified as necessary. I can advise however, that this document would not necessarily be required to validate any future application, but is still nonetheless recommended.

Ideally the assessment would cover the following matters:

- Identification of any remedial measures required to deal with any hazards identified;
- A Remediation Strategy (where necessary), including remediation options appraisal; and
- A verification plan and report.

Historic Environment

As you are aware, the site is located in close proximity to the Hafod Hall Care Home, which contains two separate listed buildings. It is likely that the application site was once owned/attached to the hall and arguably formed part of its setting.

In discussion with the Council's Conservation Officer, a review of old maps would suggest that the application site was once the formal gardens to the hall and featured ponds/lakes, lawns etc.

As such, any future application should be supported by an appropriately detailed Heritage Statement/Assessment or Heritage Impact Assessment to demonstrate what contribution the application site makes to the significance of these heritage assets, but also what impacts would arise from the development proposed

Conclusion

As I have set out above and during our previous correspondence, I am unable at this time to provide you with a likely policy position and basis by which this application will be assessed when finally submitted. As such, I am unable to confirm the Council's position as to whether or not any future application would be viewed favourably at an officer level. I would also note that as a major application, this would require determination by the members of the Wrexham Council's Planning Committee in line with the adopted scheme of delegation.

However, hopefully the above information sets out the main considerations that the Local Planning Authority will take into account in the determination of any future application, and what is needed to address these matters.

We aim to determine planning applications as efficiently as possible. To help with this it is essential that applications are submitted with all the information that the Council will need to determine them. In this instance this will include:

- Completed Application Form;
- Location Plan;
- Site Plan;
- Existing Plans;
- Proposed plans including layout, elevations, section and levels;
- Landscape and Visual Appraisal;
- Glint and Glare Assessment;
- Landscape Scheme and management plan – including a planting plan;
- Biodiversity Matrix and mitigation to demonstrate Biodiversity Net Benefit;
- Drainage Strategy;
- Ecological Appraisal;
- Design and Access Statement;
- Planning Statement – giving detailed explanation of proposed use and how it will operate;
- Land Contamination Assessment and Remedial Measures Report;
- Tree survey and Arboricultural Impact Assessment (including methodology for working in area of trees to be retained) should any existing trees be affected;
- Construction Environmental Management Plan;
- Heritage Impact Assessment;
- Assessment of the Mineral resource.

Next Steps

I note that you have already approached the Local Planning Authority for a Screening Opinion as to whether the proposal would be deemed to be EIA development, which the LPA has confirmed not to be the case. As such, any future application need not be accompanied by an Environmental Statement.

Although there is no statutory requirement to do so, as you are no doubt aware solar farm developments can often be very locally sensitive. As such, I would strongly recommend that you undertake a public engagement exercise prior to the submission of any future application. This would be with local residents, representatives of the Community Council and also with the Local Ward Member for the area. This would be an opportunity to take on board any points of concern that may be raised, and potentially enable them to be designed out at this stage. This may also lead to a smoother application process in the longer term.

The advice is based on the planning policies, guidance and circumstances that apply at the time of this response. This advice may not be relevant may should policies or circumstances change before a formal planning application is submitted. You should also note that the above comments are the informal views of an Officer of the Council and do not commit the Council in the determination of any formal planning application.

Yours sincerely,



Nick Atkinson
Lead Officer – Development Management