

Prosiect Maen Hir

Solar a Storio Ynni



Preliminary Environmental Information Report Volume III

Appendix 2-2: EIA Scoping Opinion

Prosiect Maen Hir - September 2024

EN010156

lightsource bp





SCOPING OPINION:

Proposed Maen Hir Solar and Energy Storage Project

Case Reference: EN010156

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

19 December 2023



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1. INTRODUCTION

- 1.0.1 On 09 November 2023, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Lightsource bp who are promoting on behalf of Lightsource SPV 204 Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Maen Hir Solar Farm (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.
- 1.0.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:
- Scoping Report main text and Appendix 5.1:
<http://infrastructure.planninginspectorate.gov.uk/document/EN010156-000014>
- Scoping Report Appendix 7.1:
<http://infrastructure.planninginspectorate.gov.uk/document/EN010156-000015>
- Scoping Report Figures Part 1:
<http://infrastructure.planninginspectorate.gov.uk/document/EN010156-000016>
- Scoping Report Figures Part 2:
<http://infrastructure.planninginspectorate.gov.uk/document/EN010156-000017>
- 1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should **be read in conjunction with the Applicant's Scoping Report.**
- 1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has/ has not agreed to scope out certain aspects/ matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects/ matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/ matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.0.5 Before adopting this Opinion, the Inspectorate has consulted the '**consultation bodies**' listed in Appendix 1 in accordance with EIA Regulation

10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.

- 1.0.6 The Inspectorate has published a series of advice notes on the National Infrastructure Planning website, including [Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>
- 1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Section 3)

ID	Ref	Description	Inspectorate's comments
2.1.1	Section 3	Project description	<p>The description of the Proposed Development within the Scoping Report is relatively high level (at this stage) which does affect the level of detail possible in the Inspectorate's comments. In particular, the Inspectorate notes that the locations of principal development components within the Site (eg. the ~5MW Community Solar PV Array) are not defined, while the locations of other components (eg the Battery Energy Storage System (BESS) and Project Substation) are described as approximate. The area outside the Site but within the Scoping Study Area is the search area for the Main High Voltage Cable Route, Grid Connection Corridor, construction access and further mitigation and enhancement areas, which will be refined as the Proposed Development progresses.</p> <p>The Inspectorate understands that at this point in the evolution of the Proposed Development, a final description of the development is not yet confirmed and the red line boundary is likely to be refined. However, the Applicant should be aware that the description of the Proposed Development provided in the ES must be sufficiently certain to meet the requirements of the EIA Regulations. The description of the Proposed Development in the ES should make reference to the design, size and locations of each element, including maximum heights, design parameters and limits of deviation. The description should be supported (as necessary) by figures, cross sections and drawings which should be clearly and appropriately referenced.</p>

ID	Ref	Description	Inspectorate's comments
2.1.2	Para 3.1.2	New National Grid 400kV Substation	<p>The Project Substation would connect to a new National Grid 400kV Substation. Paragraph 3.1.2 of the Scoping Report states that the National Grid Substation is to be consented separately by National Grid Electricity Transmission (NGET) and that its location has yet to be determined.</p> <p>The ES should clearly describe the relationship between the Proposed Development and connected projects. This should include the extent to which the Proposed Development is dependent on their delivery and the development timelines and anticipated consenting routes of the other projects, with an explanation of how these will be coordinated. The assessment should address the potential for the connected projects to result in a likely significant effect (LSE). The Inspectorate advises that the ES sets out clearly and in detail, how the assessment addresses impacts resulting from consequential development and activity where significant effects are likely to result. The ES should clearly explain and justify the boundaries and limitations of the assessment and, noting uncertainty may persist, any reasonable assumptions that have been applied. The assessment should address the worst case scenario (which may differ for different aspects).</p>
2.1.3	Paras 3.2.23 and 3.2.24	Underground cables	<p>The ES should describe the likely routeing, trench width and depth and working width for the underground cabling. The works required to install the cables should be described, including any dewatering of excavations.</p>
2.1.4	Paras 3.2.6 to 3.2.8	Panels	<p>The Scoping Report states that there are currently two options under consideration for the panel mounting structures (fixed south facing or tracking). Where possible the Inspectorate recommends this decision is made prior to submission of the DCO application. If this is not possible, the ES should identify and assess the worst-case scenario</p>

ID	Ref	Description	Inspectorate's comments
			for applicable topics (including Landscape and Visual, Cultural Heritage, Glint and Glare and Ecology) during operation.
2.1.5	Para 3.2.9	Installation of photo voltaic (PV) module mounting frames	<p>The Scoping Report states that the frames upon which the solar PV panels will be mounted will be pile driven or screw mounted into the ground. The option to install concrete blocks known as 'shoes' may also be considered, avoiding the need for driven and screw anchored installation.</p> <p>The ES should assess the installation method to be used, or where this is still to be determined, a worst case scenario should be adopted to identify any LSE.</p>
2.1.6	Para 3.2.21	Trenchless crossings	The location of any trenchless crossings should be identified within the ES. Where trenchless installation is relied upon to mitigate potential significant effects, the Applicant should ensure this construction method is demonstrably secured.
2.1.7	Paras 3.2.31 and 3.2.32	Site access	The ES should describe the proposed site entrance/s and the routes to be used for all vehicular access during construction and operation of the Proposed Development and this information should be clearly presented on supporting plans within the ES. The ES should describe and assess the potential impacts (both positive and negative) associated with any improvements/ changes to the access routes which are either required to facilitate construction of the Proposed Development or are required for restoration purposes on completion of the works. For the assessment of impacts during construction the ES should explain how the proposed access route(s) relate to sensitive receptors.
2.1.8	Para 3.2.34	Community solar array	The Scoping Report states that a ~5MW Community Solar PV array forms part of the Proposed Development, but further details are not provided. The ES should provide a description of the location and

ID	Ref	Description	Inspectorate's comments
			physical characteristics of this component, along with a description of how it would operate.
2.1.9	Paras 3.2.35 to 3.2.38	BESS	The description of the physical characteristics and technical capacity of the BESS should be developed in the ES to include details such as battery technology type/ specification and anticipated number of battery storage containers.
2.1.10	Section 3.4	Description of construction phase including duration of impacts	<p>No information on the likely duration of construction phase impacts has been provided in Section 3 of the Scoping Report. Impacts are described in the aspect sections as "<i>short term</i>" or "<i>temporary</i>", but the absence of information on likely duration creates difficulty in understanding how conclusions on the potential for significant effects have been reached.</p> <p>The description of the characteristics of the construction phase should be developed in the ES to include details of the likely commencement date, duration and location of the required construction activities. The anticipated numbers of construction workers should also be stated.</p>
2.1.11	Section 3.4	Construction	The ES should provide details of the anticipated construction working hours (including any night-time working required) and activities on which the assessments of LSE have been based. This should be consistent with the working hours specified in the draft Development Consent Order (dDCO).
2.1.12	Section 3.4	Construction compound(s)	The ES should confirm the locations and sizes of the primary and secondary temporary construction compound(s) and where possible, show detailed layouts. Any mitigation measures proposed to avoid or minimise impacts relating to the use of compounds should be described in the ES.

ID	Ref	Description	Inspectorate's comments
2.1.13	Section 3.4	Culverts	The Scoping Report refers to potential usage of culverts over drainage ditches. The ES should identify the locations of proposed water crossings and explain the design of the crossings; these should be designed to minimise/ avoid environmental impacts and effort should be made to agree the design with the relevant consultation bodies. Impacts from water crossings, including any impacts on the existing drainage regime, should be assessed in the ES where significant effects are likely to occur.
2.1.14	Para 3.4.1	Vehicle movements	The ES should detail the number of anticipated vehicle movements during all phases of the Proposed Development and explain the assumptions upon which these have been established.
2.1.15	Section 3.5	Operation and maintenance	Proposals for maintaining vegetation around any cable easements and the Public Rights of Way (PRoW) within the application site (if these are to be retained) should also be described.
2.1.16	Section 3.6	Decommissioning	The ES should provide a description of the activities and works which are likely to be required during decommissioning of the Proposed Development, including the anticipated duration. Any proposals for restoration of the site to agricultural or other use should also be described, with reference to the proposed outline Decommissioning Environmental Management Plan (DEMP).
2.1.17	n/a	Draft/ outline plans	The Applicant should append a draft/ outline copy of proposed management plans to the ES and demonstrate how these would be secured through the dDCO. Where the ES relies upon mitigation measures which would be secured through management plans/ strategies, it should be demonstrated (with clear cross-referencing) where each measure is set out in the draft/ outline document.

ID	Ref	Description	Inspectorate's comments
2.1.18	Para 3.7.3	Design envelope approach	Paragraph 3.7.3 of the Scoping Report refers to assessment of the "realistic worst-case effects" . The ES should assess the worst case that could potentially be built out in accordance with the Authorised Development of the DCO being applied for. The development parameters should be clearly and consistently defined across both the dDCO and the accompanying ES.
2.1.19	n/a	Existing infrastructure	<p>The Scoping Report identifies a number of existing infrastructure assets within or in proximity to the application site, including a 400kV overhead line, a wind farm and solar development. The assessment in the ES should take into account the location of existing infrastructure and identify any interactions between it and the Proposed Development. Any significant effects that are likely to occur should be assessed. The Applicant's attention is drawn to the scoping consultation responses including from National Grid Electricity Transmission and Network Rail (Appendix 2 of this Opinion) which highlight infrastructure likely to be affected.</p> <p>The Applicant should contact National Grid to establish whether any new infrastructure is required within or in the vicinity of the Proposed Development as part of the Holistic Network Design. If so, the Applicant should consider whether this needs to be included as a receptor in the aspect assessments or as part of the cumulative effects assessment.</p>
2.1.20	n/a	Terminology	The term "Construction Logistics Hub" is defined in the Glossary, but the Scoping Report appears to use this term interchangeably with "Consolidation Hub" (which is not defined in the Glossary). Where applicable the ES should use consistent terminology throughout. If the Consolidation Hub is a separate component, the ES should include a description of the physical characteristics and land-use requirements of this component.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 6)

ID	Ref	Description	Inspectorate's comments
2.2.1	Section 3.5; Paras 6.1.7 and 6.5.1	Impacts from maintenance including component replacement	<p>The Scoping Report explains that maintenance activities would involve the replacement of equipment such as PV modules, inverters and batteries during the proposed operational lifespan of 60 years.</p> <p>Although there is potential for technological improvements to extend the design life of panels, the Inspectorate considers it likely that all panels would have to be replaced at least once during the operational life of the Proposed Development. The ES should ensure that a worst-case scenario is assessed. Where there is the potential for comprehensive replacement of infrastructure during the operational lifespan of the Proposed Development this should be appropriately assessed.</p> <p>The ES should describe the scope and duration of the maintenance and replacement activities likely to be required, including predicted vehicle movements and staffing numbers. The ES should provide estimates of types and quantities of waste expected as well as an assessment of any likely significant effects associated with the generation and disposal of waste.</p> <p>The Applicant should ensure that the operational lifespan assessed within the ES is consistent with any time limit specified within the dDCO. Where a time-limited consent is not being sought within the DCO the ES should assume any LSE would be permanent in nature.</p> <p>Paragraph 3.5.3 of the Scoping Report states that an Operational Environmental Management Plan (OEMP) would include control measures to ensure no significant impacts would arise during the maintenance and replacement activities. The Applicant should append a draft/ outline copy of the OEMP to the ES and demonstrate how it</p>

ID	Ref	Description	Inspectorate's comments
			would be secured through the dDCO. Where the ES relies upon mitigation measures which would be secured through the OEMP, it should be demonstrated (with clear cross-referencing) where each measure is set out in the draft/ outline document.
2.2.2	Paras 6.5.16 to 6.5.23	Cumulative effects	<p>The Inspectorate appreciates that the other developments for inclusion within the cumulative effects assessment are yet to be determined.</p> <p>Isle of Anglesey County Council (IoACC) has advised (see Appendix 2 of this Opinion) that there are a number of other major developments proposed on the Island, which include solar farm and BESS projects which are similar in scale, nature and location to the Proposed Development. In particular the Council highlights the potential for cumulative effects with the proposed Alaw Mon Solar Farm and battery storage development; cumulative effects with this project should be fully assessed in the ES.</p> <p>In addition to IoACC, efforts should be made to agree the scope of the cumulative assessment with other relevant consultation bodies including Natural Resources Wales (NRW) and National Grid.</p>
2.2.3	Paras 6.5.24 and 6.5.25	Transboundary	<p>The Inspectorate on behalf of the SoS has considered the Proposed Development and concludes that the Proposed Development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the Proposed Development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts.</p> <p>The Inspectorate considers that the likelihood of transboundary effects resulting from the Proposed Development is so low that it does not warrant the issue of a detailed transboundary screening.</p>

ID	Ref	Description	Inspectorate's comments
			<p>However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision.</p> <p>Note: The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process.</p> <p>The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Note Twelve, available on our website at http://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/</p>

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Landscape and Visual

(Scoping Report Section 7.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Para 7.2.28 and Table 7-15	Impacts on National Landscape Character Areas (NLCA) - all phases	<p>The key characteristics and management objectives of NLCAs would inform the description of baseline conditions in the ES assessment. Due to the availability of more detailed IoACC and LANDMAP assessments undertaken at the local level, the Scoping Report proposes to scope out an assessment of impacts on NLCAs. Impacts on IoACC Landscape Character Areas (LCA) would be assessed.</p> <p>The Inspectorate is content that an assessment of effects on NCLAs can be scoped out of further assessment on this basis.</p>
3.1.2	Para 7.2.30 and Table 7-15	Impacts on Marine Character Areas (MCA) – all phases	<p>The Scoping Report proposes that this matter is scoped out on the basis that the Zone of Theoretical Visibility (ZTV) maps (see Scoping Report Figures 7-7 to 7-13) and field investigations have shown that the coastal MCAs are unlikely to be affected by the Proposed Development.</p> <p>Having regard to the location, nature and characteristics of the Proposed Development, the Inspectorate agrees that significant effects are not likely. Impacts on MCAs can be scoped out of further assessment.</p>
3.1.3	Para 7.2.31 and Table 7-15	<p>Impacts on the following IoACC LCA – all phases:</p> <ul style="list-style-type: none"> ▪ LCA 4, North West Coast; and 	<p>The Scoping Report proposes to assess impacts on five IoACC LCA (as identified in Table 7-2 of the Scoping Report), describing these as the LCAs "<i>...likely to be affected by the Project</i>". The 2km study area extends into two further IoACC LCA (LCA 4 and LCA 9, as shown on</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<ul style="list-style-type: none"> ▪ LCA 9, Red Wharf Bay. 	<p>Figure 7-3 of the Scoping Report) which are proposed to be scoped out.</p> <p>Having regard to the location, nature and characteristics of the Proposed Development, the Inspectorate agrees that significant effects are not likely. Impacts on IoACC LCA 4 and LCA 9 can be scoped out of further assessment.</p>
3.1.4	Para 7.2.42 and Table 7-15	Impacts on visual receptors located outside of the Zone of Visual Influence (ZVI) – all phases	<p>The Scoping Report explains that visual receptors would be identified within the ZTV and a refined ZVI, or the main area of visibility arising from the Proposed Development as determined from the field surveys. The Scoping Report states that visual receptors located outside of the ZVI would have very limited or no visibility of the Proposed Development.</p> <p>The assessment of impacts to landscape and visual amenity (including the study area, ZTV, ZVI and photomontages) should be based on the relevant worst-case having regard to any parameters applicable to the Proposed Development, including panel orientation and all proposed structures such as the BESS. If during the design evolution of the Proposed Development it is determined that locations of key development components have changed, or maximum parameters will exceed the heights used in the preliminary ZTVs (shown on Figures 7-7 to 7-13 of the Scoping Report), the Applicant should re-run the ZTV and review the study area and identified receptors accordingly.</p> <p>The Applicant should make effort to agree the study area and methodology for the ZTV and ZVI with relevant consultation bodies including IoACC.</p> <p>On the basis of the above, the Inspectorate agrees that any impacts on visual receptors located outside of the ZVI, once ground truthed</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			by field work, are unlikely to result in significant effects. This matter can be scoped out of further assessment.
3.1.5	Para 7.2.59 and Table 7-14	Impacts on all special qualities of the Anglesey Area of Outstanding Natural Beauty (AONB) (identified within Appendix 1 and Table 1 of the Isle of Anglesey AONB Management Plan 2015-2020), with the exception of the 'expansive views' special quality – all phases	<p>The Scoping Report does not provide a list of the special qualities of the Anglesey AONB (now 'Anglesey National Landscape') which are proposed to be scoped out and instead, cross refers to the Isle of Anglesey AONB Management Plan 2015-2020 which it states identifies the special qualities.</p> <p>The Inspectorate notes that the Isle of Anglesey AONB Management Plan 2015-2020 has now been superseded by the Isle of Anglesey AONB Management Plan 2023-2028. Without sight of the previous version, it is unclear which special qualities are proposed to be scoped out and whether the special qualities remain the same in the new plan. As such, the Inspectorate is not in a position to scope these matters out of the ES at this stage. Accordingly the ES should include an assessment of these matters or information demonstrating agreement with the relevant consultation bodies and the absence of a LSE.</p>
3.1.6	Para 7.2.66 and Table 7-15	Impacts on Parciau Estatelands Special Landscape Area (SLA) – all phases	The Scoping Report states that the ZTV (Figures 7-9, 7-12 and 7-13) and fieldwork has identified that there would be restricted visibility between the Proposed Development and the Parciau Estatelands SLA, such that the effects are unlikely to be significant. The Inspectorate agrees that impacts on Parciau Estatelands SLA are not likely to result in significant effects and can be scoped out of further assessment.
3.1.7	Para 7.2.20 and Table 7-15	Impacts on Eryri/ Snowdonia National Park – all phases	The Inspectorate considers there is insufficient information at this stage regarding the potential for views of the Proposed Development from the National Park to demonstrate that significant effects will not occur. Accordingly, the ES should include an assessment of impacts on visual amenity from Eryri/ Snowdonia National Park, or

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			information to demonstrate agreement with the relevant consultation bodies and the absence of a LSE.
3.1.8	Table 7-15	<p>Visual impacts on users of the following key transport routes – all phases:</p> <ul style="list-style-type: none"> ▪ A5025 between Cemaes, Amlwch and Penysarn; ▪ A55 and A5 between Holyhead, Llanfihangel yn Nhowymn, Gwalchmai and Menai Bridge / Porthaethwy; and ▪ B5112 between Llanerch-y-medd, Carmel, Trefor and Engedi. 	Table 7-15 of the Scoping Report proposes that an assessment of these matters is scoped out, but no supporting evidence or justification is provided to explain why significant effects would not occur. As such, the Inspectorate is not in a position to scope these matters out of the ES. Accordingly the ES should include an assessment of these matters or information demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.1.9	Table 7-15	Visual impacts on users of Long Distance Recreational Trails, National Cycle Routes and Accessible Landscapes from the ES LVIA Chapter	<p>The Scoping Report proposes that impacts to these receptor groups are scoped out of the ES LVIA Chapter and instead, assessed within a separate Amenity and Recreation Assessment (ARA) to be presented as an appendix to the ES LVIA Chapter.</p> <p>Providing that the ES LVIA Chapter contains a summary of the assessment in the ARA and identifies any significant effects on users of Long Distance Recreational Trails, National Cycle Routes and Accessible Landscapes, the Inspectorate is content with this approach.</p>
3.1.10	Table 7-15	Visual impacts on users of the following routes/ areas from the ARA – all phases:	Table 7-15 of the Scoping Report proposes that an assessment of visual impacts on users of these routes/ areas is scoped out of the ARA. The Inspectorate notes from Figure 7-5 of the Scoping Report that a number of identified routes are located over 500m from the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<ul style="list-style-type: none"> ▪ Isle of Anglesey/ Wales Coast Path – between Porth Cynfor/ Hells Mouth and Porth Llechog Bill Bay at Amlwch; ▪ National Trust – Coronation Tower King Edward VIII and Porth Cynfor/ Hells Mouth; ▪ Geotrail – Wyfla Visitor Centre to Cemaes Bay; ▪ Geotrail – Bodafon to Moelfre; ▪ Geotrail – Porth Amlwch; ▪ Circular Walk – Llanellian; ▪ Open Access Land – Penygraigwen; ▪ PRow located outside of the 500m study area for the northern, central and southern parcels; and ▪ PRow which are no longer used, accessible or identifiable on the ground. 	<p>solar development parcels (which represents the proposed study area for the ARA) - but as the route sections proposed to be scoped out are not labelled on Figure 7-5, the Applicant's proposed approach is unclear. No other supporting evidence or justification is provided to explain why significant effects would not occur.</p> <p>As such, the Inspectorate is not in a position to scope these matters out of the ES. Accordingly the ES should include an assessment of these matters or information demonstrating agreement with the relevant consultation bodies and the absence of a LSE</p> <p>The Scoping Report does not explain why the proposed study area for the ARA is considered appropriate. The Inspectorate considers this is a relatively small study area, given the nature and scale of the Proposed Development. The ES should explain the how the study area for the ARA has been defined, with reference to the extent of the likely impacts from the Proposed Development. Effort should be made to agree the study area and receptors considered within the ARA with relevant consultation bodies.</p>
3.1.11	Paras 7.2.103 and 7.2.127; Tables 7-15 and 8-1	Night-time effects and lighting – all phases	Paras 7.2.103 and 7.2.127 of the Scoping Report propose that a 'separate Lighting Impact Assessment ' is scoped out. Table 7-15 proposes that an assessment of impacts from lighting is scoped out of the ES, stating that any lighting during the construction and decommissioning phases would be temporary and any lighting during operation will be restricted to the substations, BESS and security

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>lighting sensors. However, Table 8-1 of the Scoping Report identifies night-time effects and lighting as scoped into the assessment for all phases. As a result the Applicant's proposed approach is unclear.</p> <p>The Inspectorate has interpreted this as the Applicant proposing to scope out a separate Lighting Impact Assessment and assessment of LSE resulting from night-time effects and lighting.</p> <p>Noting the rural, largely unlit environment in which the Proposed Development is located and the likely change from the current baseline, the Inspectorate does not agree to scope this matter out of the assessment. Impacts on landscape and visual amenity resulting from the introduction of lighting during construction, operation and decommissioning which are likely to result in significant effects should be assessed in the ES, unless it is agreed with relevant consultation bodies that this matter can be scoped out. Any proposed mitigation measures should be described and secured through the DCO. The assessment should cross refer to other relevant aspect assessments and sensitive receptors (such as ecology and cultural heritage).</p>

ID	Ref	Description	Inspectorate's comments
3.1.12	Paras 7.2.39 and 7.2.47; Table 7-5; and Figure 7-12	Viewpoints and photomontages	<p>Table 7-5 of the Scoping Report sets out 20 preliminary viewpoints (as illustrated on Figure 7-12) located within the 3km study area, with photomontages proposed from viewpoint locations 7, 8, 12, 15 and 17. The Inspectorate considers this is a relatively low number of viewpoints and photomontages, given the nature and scale of the Proposed Development.</p> <p>The Scoping Report ZTV figures, including Figures 7-12 and 7-13, show that the Proposed Development may be visible from locations outside of the 3km study area (for example from Cemaes Bay,</p>

ID	Ref	Description	Inspectorate's comments
			<p>Anglesey National Landscape, Mynydd Eilian to the north-east and Llyn Llywenan to the south-west) and the Inspectorate advises that suitable viewpoints are selected from these areas. The Inspectorate also advises that suitable viewpoint(s) are selected from Eryri/ Snowdonia National Park and from the highlands within the coastal areas on the mainland, as well from as locations where cumulative effects with other developments may be experienced. IoACC has also provided suggestions for viewpoint locations (see Appendix 2 of this Opinion).</p> <p>Effort should be made to agree the number and location of viewpoints, as well as the locations for photomontages, with relevant consultation bodies including local authorities, Cadw and NRW and be in line with relevant guidance, where possible.</p>
3.1.13	Tables 7-7, 7-8 and 7-11 to 7-13	Criteria for assessments	<p>Some criteria for the landscape and visual assessments are presented within the same table in the Scoping Report (eg Table 7-7 presents susceptibility criteria for both landscape and visual receptors).</p> <p>To help clearly distinguish between the assessment of landscape effects and the assessment of visual effects, the Inspectorate recommends separate criteria are presented for each assessment, in line with advice in the Guidelines for Landscape and Visual Impact Assessment (GLVIA)¹.</p>
3.1.14	Para 7.2.87	Significance of effects	<p>The Scoping Report states that only effects on landscape and visual receptors that are Major-Moderate or Major would be considered significant. Moderate effects (and below) would not be considered significant.</p> <p>The Inspectorate considers that moderate effects could be significant, particularly in the context of high value receptors such as the</p>

¹ Landscape Institute / Institute of Environmental Management and Assessment (2018) - Guidelines for Landscape and Visual Impact Assessment, 3rd Edition

ID	Ref	Description	Inspectorate's comments
			Anglesey National Landscape. Whilst the GLVIA makes clear that professional judgement is an important part of LVIA, the ES should fully justify how professional judgement has been used to determine significance of effects, particularly around the determination of significance. The Applicant's attention is drawn to comments from NRW in this regard (Appendix 2 of this Opinion).
3.1.15	Paras 7.2.104 to 7.2.124	Impacts	<p>Many of the field boundaries within the study area are formed by hedgerows and cloddiau (a dry-stone outer wall with a compacted earth, or earth/ rubble core), which are an important feature of the existing character of the landscape. The Scoping Report explains that these will be retained where practicable, with the exception of removals and/ or crossings required for new access tracks, perimeter fencing and cable routes.</p> <p>Existing vegetation and cloddiau should be mapped and any loss of or impacts to hedgerows, cloddiau, trees and woodland which are likely to result in significant effects on landscape and visual amenity should be assessed in the ES.</p>
3.1.16	n/a	Mitigation	<p>The ES should demonstrate that the choice of mitigation measures for the purposes of reducing landscape and visual impacts is appropriate to the prevailing landscape character. For example, tree belt screening planting may not be appropriate in open landscapes.</p> <p>The ES should clearly present any assumptions made with regards to the height that the proposed mitigation planting would have reached by the assessment years, for the purposes of generating photomontages and reaching the assessment conclusions.</p>
3.1.17	n/a	Cumulative effects	The assessment of cumulative effects on visual receptors should be supported by ZTV(s) to illustrate the potential impact of the Proposed Development cumulatively with other relevant developments.

3.2 Ecology and Biodiversity

(Scoping Report Section 7.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Table 7-17 and para 7.3.66	Statutory and non-statutory designated sites (without mobile qualifying criteria) located greater than 2km from the Site/ Scoping Study Area – construction and operation	<p>Effects on these designated sites are proposed to be scoped out on the basis of distance between the Site/ Scoping Study Area and the sites, together with the absence of mobile criteria.</p> <p>Having regard to the nature and characteristics of the Proposed Development, the Inspectorate is content that this matter can be scoped out for the operational phase.</p> <p>With regards to construction phase impacts, information has not been provided within the Scoping Report to confirm the absence of a hydrological pathway for significant effects on statutory and non-statutory designated sites during construction. The Inspectorate is therefore not in a position to agree to scope out this matter for construction. The ES should assess any LSE on statutory and non-statutory designated sites, including those located over 2km from the site, resulting from hydrological changes and water quality impacts during construction. The assessment should include the potential for increased nutrient and other pollutant inputs. Appropriate cross reference should be made in the ES between the ecology and water environment assessments. The ES should include an assessment of these matters or information demonstrating agreement with the relevant consultation bodies that these receptors can be scoped out of assessment and the absence of a LSE.</p>
3.2.2	Table 7-17 and para 7.3.70	Non-statutory designated sites (Local Wildlife Sites (LWS)) greater than 2km from the Site/ Scoping	The Scoping Report states these receptors are scoped out based on distance between the Site/ Scoping Study Area and the non-statutory designated sites and considers it unlikely there would be an impact pathway on species associated with these sites. The number and

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		Study Area – construction and operation	nature of sites beyond 2km are not identified. As noted for sites without mobile species above, having regard to the nature and characteristics of the Proposed Development, the Inspectorate is content that this matter can be scoped out for the operational phase. However, the ES should assess any LSE on non-statutory designated sites, including those located over 2km from the site, resulting from hydrological changes and water quality impacts during construction.
3.2.3	Table 7-17 and para 7.3.74	Impacts to common and widespread habitats of low sensitivity and/ or conservation interest – construction and operation	<p>This is proposed to be scoped out as effects are considered very unlikely due to the habitats being of low sensitivity and/ or conservation interest. Paragraph 7.3.74 also states that standard construction mitigation measures secured by a Construction Environmental Management Plan (CEMP) would be sufficient to avoid significant adverse effects.</p> <p>The ES should explain how the importance of ecological features has been determined, with reference to baseline data, relevant guidance and professional judgement. The Applicant should make effort to agree the list of 'important ecological features' with IoACC and NRW. Subject to this, the Inspectorate agrees that a detailed assessment of impacts on ecological receptors which are not determined to be 'important' can be scoped out of the ES.</p>
3.2.4	Table 7-17 and para 7.3.92	<p>Operational impacts on the following statutory and non-statutory designated sites:</p> <ul style="list-style-type: none"> Statutory designated sites (European sites with mobile qualifying criteria) located up to 10km from the Site/ Scoping Study Area; 	Paragraph 7.3.92 of the Scoping Report refers only to maintenance activities in respect of operational impacts, although it would appear from Table 7-17 that all operational effects to statutory and non-statutory designated sites are proposed to be scoped out. The Scoping Report states that mitigation measures such as the timing of maintenance works to avoid nesting and breeding of birds and/ or non-breeding/ wintering birds if present would be sufficient to avoid significant adverse effects, and that indirect impacts on adjacent land that is functionally linked to designated sites would be sufficiently

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<ul style="list-style-type: none"> Statutory designated sites (SSSIs) within 2km of the Site/ Scoping Study Area; and Non statutory designated sites (LWS) within 2km of the Site/ Scoping Study Area. 	<p>mitigated by measures secured by the OEMP to avoid any significant adverse effects. The Scoping Report also states that mitigation measures secured through the OEMP would be sufficient to avoid significant adverse effects associated with maintenance activities on non-statutory designated sites within 2km.</p> <p>The Scoping Report does not contain sufficient justification that there would be no LSE on statutory or non-statutory sites within these specified distances during operation, either directly or indirectly. Limited information is provided in respect of the species using the Proposed Development that may be connected with statutory or non-statutory designated sites. Similarly, the mitigation measures are not described in sufficient detail to be confident in their delivery to avoid/reduce LSE. The Scoping Report also fails to consider the impacts of the panels being in situ and any LSE this may have on breeding and wintering birds during operation.</p> <p>In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope these matters out from the assessment. Accordingly, the ES should include an assessment of LSE on these designated sites during operation, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.</p>
3.2.5	Table 7-17	Designated sites and notable habitats susceptible to air quality impacts – operation	<p>The Scoping Report states that vehicle trips for operation activities will not exceed the IAQM thresholds. As such, there is no potential for operation of the Proposed Development to have significant air quality impacts on protected or otherwise notable habitats within 200m of the affected road network.</p> <p>On this basis, the Inspectorate is content that this matter can be scoped out of further assessment.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.6	Table 7-17	Designated sites, protected and notable species susceptible to Invasive Non-Native Species (INNS) within the Scoping Study Area –operation	<p>This matter is scoped out on the basis that there would be no further risk of introducing INNS during operation.</p> <p>The Inspectorate agrees that spread of INNS during operation is unlikely to result in significant effects and can be scoped out of the ES, provided suitable mitigation is in place. The ES should detail and secure mitigation/ biosecurity measures during all phases of the Proposed Development to avoid/control the spread and introduction of INNS. In respect of operation, the Applicant should ensure necessary control and eradication measures are included within the draft/ outline OEMP.</p>
3.2.7	Para 7.3.91	Impacts from dust on designated sites and habitats susceptible to air quality impacts – construction	<p>Although not included as an item in Table 7-17, para 7.3.91 states that due to mitigation measures to manage dust as implemented by a CEMP it is considered that there is no potential for significant effects to ecological receptors as a result of dust deposition.</p> <p>Whilst the Inspectorate agrees that dust deposition is likely to be limited to within 50m and measures are available to control dust, Llyn Alaw SSSI lies immediately adjacent to the Proposed Development and may be sensitive to smothering and/ or nutrient enrichment from dust. In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of effects on Llyn Alaw SSSI due to dust deposition of or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.</p>
3.2.8	Table 7-17	Statutory designated sites (Special Protection Areas (SPAs), Special Areas of Conservation (SACs),	Although not explicitly identified as a matter for scoping out, Table 7-17 infers all statutory designated sites beyond 10km are scoped out of the assessment. The Inspectorate does not agree that statutory

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		Ramsar) beyond 10km – construction and operation	designated sites beyond 10km should be scoped out of the assessment. The ES should include an assessment of effects on designated sites with mobile species beyond 10km, where LSE could occur or information demonstrating the absence of LSE and clear agreement with relevant consultation bodies.
3.2.9	Table 7-17 and para 7.3.68	Statutory designated sites (SSSIs) beyond 2km – construction and operation	It is noted that Table 7-16 identifies SSSIs located within 5km of the Proposed Development; however, Table 7-17 indicates that only SSSIs within 2km are scoped into the assessment. No justification is provided as to why there would be no impact pathway to SSSIs beyond 2km, such as through hydrological links or due to the presence of mobile bird features of SSSIs. The ES should include an assessment of effects on SSSIs beyond 2km, where likely significant effects could occur. The Applicant should make efforts to agree the SSSIs which should be included in the assessment with relevant statutory bodies.

ID	Ref	Description	Inspectorate's comments
3.2.10	Paras 7.3.37 and 7.3.67 to 7.3.70	Zone of Influence (Zoi) and study areas	<p>The Scoping Report states that the Zoi for the Proposed Development is "is the area over which ecological features may be affected by changes as a result of the Project and associated activities" and may vary between each ecological receptor identified. No information is provided explaining how the Zoi will be determined. The ES should describe the methodology and factors used to determine the relevant Zoi(s) and state the relevant Zoi for each receptor or group of receptors considered in the assessment.</p> <p>Although the Scoping Report describes that a Zoi will be applied, it also refers to fixed distance study areas for each receptor type (eg statutory designated sites). These fixed distances are heavily relied</p>

ID	Ref	Description	Inspectorate's comments
			<p>upon to scope out LSE on receptor types, such as statutory designated sites beyond 10km (paras 7.3.67 to 7.3.69). The Scoping Report does not justify why potential effects on mobile species associated with designated sites would only occur to sites within 10km (or 2km for non-statutory and sites without mobile species) of the Scoping Study Area, particularly where highly mobile bird species may be present. The ES should ensure the study area reflects the Proposed Development's ZoI rather than being based on a fixed distance. The impact assessment should be based on the ZoI from the Proposed Development and in consideration of the species/habitats concerned. Clear justification should be provided to support any distances applied.</p>
3.2.11	Para 7.3.54 and Table 7-18	Wintering and breeding birds – data and surveys	<p>Limited information has been included in the Scoping Report regarding the bird surveys undertaken to date and the survey findings, particularly in relation to wintering birds. The impact assessment should be informed by appropriate breeding and wintering bird surveys following established guidelines. The Applicant should seek to agree the scope of wintering and passage bird surveys with relevant consultation bodies, including NRW.</p> <p>The Applicant's attention is directed to the comments of NRW at Appendix 2 to this Opinion with regards to potential bird species that may be present in the area and potentially affected by the Proposed Development, including Greenland white fronted goose (GwfG) and chough. The Scoping Report makes no reference to GwfG and it is noted that several statutory sites designated for their chough qualifying features are scoped out on the basis that they lie beyond the 10km study area.</p> <p>The Applicant's attention is also directed to the comments of NRW with regards to further bird surveys, including but not limited to comments in respect of GwfG, chough, barn owl and whooper swan. The Applicant should seek to agree data sources and the scope of any</p>

ID	Ref	Description	Inspectorate's comments
			further targeted surveys required for such species, including the need for targeted transects, vantage point surveys, and/or crepuscular surveys.
3.2.12	Paragraph 7.3.88	Fish	Noting the presence of several fish species of conservation concern, mitigation measures for fish species should be clearly set out in the ES and adequately secured through the dDCO. The Applicant's attention is also directed to the comments of NRW at Appendix 2 to this Opinion with regards to restrictions to carrying out in river works and the need to undertake fish rescues where such species are present and watercourses could be impacted.
3.2.13	Section 3.4	Biodiversity enhancements and Landscape Ecology Management Plan (LEMP)	<p>The ecology chapter of the Scoping Report does not make explicit reference to the production of a LEMP, although this is referenced elsewhere in the Scoping Report (eg Section 3.4). Some reference is made in the ecology chapter to further biodiversity and enhancement improvements to be explored throughout the evolution of the Proposed Development.</p> <p>The ES should include a draft/ outline LEMP setting out how the Applicant intends to deliver biodiversity enhancements. The ES should distinguish between measures intended to avoid or reduce the potential for likely significant effects, and those which have been identified for enhancement only.</p>
3.2.14	N/A	Confidential Annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as

ID	Ref	Description	Inspectorate's comments
			normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.3 Cultural Heritage

(Scoping Report Section 7.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Paras 7.4.34, 7.4.42 and Table 8-1	Impacts on buried archaeology – operation	The Scoping Report proposes to scope this matter out on the basis that impacts to buried archaeology would only occur as a result of ground disturbance from construction activities. The Inspectorate is content that significant effects on buried archaeology are unlikely to occur during operation and agrees that this matter can be scoped out of further assessment.
3.3.2	Para 7.4.35 and Table 8-1	Impacts on buried archaeology – decommissioning	<p>The Scoping Report states that no additional disturbance to the ground is anticipated during decommissioning and as such, impacts to buried archaeological remains during this phase are not anticipated.</p> <p>The Inspectorate considers that there is potential for decommissioning stage impacts on buried archaeological resource, such as the potential for harm due to compaction, removal of piles, and subsequent potential changes in drainage patterns.</p> <p>In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of effects on buried archaeology during decommissioning or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.</p>
3.3.3	Paras 7.4.36, 7.4.40,	Impacts on designated historic assets, built heritage and historic landscape – construction and decommissioning	The Scoping Report proposes to scope out this matter on the basis that impacts would be temporary and limited and would not cause significant effects.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	7.4.42 and Table 8-1		<p>The Inspectorate considers that noise, vibration, dust, traffic, lighting and visual disturbance associated with construction and decommissioning could impact on the setting of these types of heritage assets. There is also a lack of information at this stage regarding the likely duration and location of construction activities in relation to heritage assets.</p> <p>The Inspectorate does not consider sufficient information has been presented to provide confidence that significant effects would not occur. In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope these matters out from the assessment. The ES should include an assessment of the effects on the setting of designated historic assets, built heritage and historic landscape during construction and decommissioning, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.</p>

ID	Ref	Description	Inspectorate's comments
3.3.4	Para 7.4.17	Study area for assessment of impacts to setting of heritage assets	<p>The Scoping Report presents a Heritage Study Area which (for effects on the setting of designated heritage assets) comprises the Scoping Study Area and a 2km buffer, as shown on Figure 7-17 of the Scoping Report. The Scoping Report considers "<i>...it can be stated with confidence that assets beyond this distance would not be adversely affected</i>".</p> <p>The ZTV maps (see Scoping Report Figures 7-7 to 7-13), prepared based on a 3km study area for LVIA, indicate that the Proposed Development may be visible from heritage assets outside of the Heritage Study Area. The Inspectorate also notes the scoping consultation response from Cadw (Appendix 2 of this Opinion), which</p>

ID	Ref	Description	Inspectorate's comments
			<p>states it expects effects on setting to be considered for all designated historic assets inside 3km of the Proposed Development (which it has listed in Annex A of its response) in accordance with the Welsh Government guidance document "<i>Setting of Historic Assets in Wales</i>"².</p> <p>The ES should contain a robust justification to support the study area and sensitive receptors selected for the purposes of the ES assessment, on the basis of relevant guidance and the extent of the likely impacts, with reference to relevant approaches including the ZTV and ZVI developed for the LVIA. It should be clear how the approach taken ensures that any heritage assets with long views towards or out from the application site have been identified and considered. Effort should be made to agree the approach and sensitive receptors with relevant consultation bodies. The study areas and locations of the heritage assets should be depicted on supporting plan/s.</p>
3.3.5	Paras 7.4.36 to 7.4.40	Impacts to setting of heritage assets	<p>Section 7.7 of the Scoping Report (Noise) states that impacts from noise and vibration on heritage receptors will be considered in the Cultural Heritage ES chapter. However, there is minimal reference to consideration of impacts from noise in the Cultural Heritage section of the Scoping Report and no reference to vibration.</p> <p>For the avoidance of doubt, the Cultural Heritage ES chapter should assess any impacts from noise and vibration which are likely to result in significant effects on heritage assets and/ or their setting.</p> <p>The ES assessment of impacts to setting should consider other relevant factors such as dust, traffic, lighting, glint and glare and changes to land use, cross-referencing to other aspect chapters as appropriate. In line with comments above, impacts during</p>

² Cadw (2017) - Setting of Historic Assets in Wales

ID	Ref	Description	Inspectorate's comments
			<p>construction, operation and decommissioning of the Proposed Development which are likely to result in significant effects on the setting of heritage assets should be assessed in the ES.</p> <p>The assessment should be supported by appropriate visualisations such as photomontages to help illustrate the likely impacts of the Proposed Development. Effort should be made to agree appropriate viewpoint locations for such visualisations with relevant consultation bodies including IoACC and Cadw. Cross-reference should be made to the LVIA ES assessment to avoid duplication.</p>
3.3.6	Paras 7.4.19 and 7.4.33	Baseline and mitigation	<p>The Scoping Report explains that the results of a desk-based assessment and geophysical survey will inform the need for and scope of any additional investigations which may be required to ensure the potential archaeological remains "<i>...are investigated and recorded at an appropriate stage in the development process</i>". The Inspectorate notes that, as set out in its scoping consultation response (Appendix 2 of this Opinion), IoACC has taken advice from Gwynedd Archaeological Planning Service (GAPS) who consider that trial trenching will be required.</p> <p>Where necessary any intrusive investigations and trial trenching should be completed prior to submission of the DCO application. The Applicant should make efforts to discuss and agree the timing, scope and methodology for any intrusive investigations and trial trenching with relevant consultation bodies.</p>
3.3.7	Para 7.4.33	Mitigation	<p>The ES should describe any proposed mitigation measures and explain how these would be secured through the dDCO, including proposals for the recording of any archaeology which would be permanently lost as a result of the Proposed Development. Efforts should be made to agree the necessary measures with relevant consultation bodies.</p>

3.4 Transport and Access

(Scoping Report Section 7.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Para 7.5.55 and Table 8-1	Alternative modes of access to site – construction	The Scoping Report proposes to scope out alternative modes of transporting construction materials as there are no other viable modes of transport from Holyhead Port to the Site apart from by road. The Inspectorate is content to scope this matter out of further assessment.
3.4.2	Para 7.5.56	Shipment of materials to Holyhead Port – construction	The Scoping Report states that the shipment of materials into Holyhead Port cannot be assessed in the ES, as the location of construction materials for the Proposed Development are currently unknown. Paras 7.6.21 and 7.6.39 explain it is likely that construction materials would be transported on existing fleet, meaning additional shipping movements would not be required. The Inspectorate agrees that this matter can be scoped out of further assessment in the Transport and Access ES Chapter.
3.4.3	Paras 7.5.57 and 7.5.58 and Table 8-1	Transport and access effects – operation	The Inspectorate agrees that the number of vehicle trips generated by the operation and maintenance of the Proposed Development are unlikely to result in significant effects, it is therefore considered acceptable to scope this matter out. The Project Description chapter of the ES should clearly set out the likely number and type of operation and maintenance vehicles.
3.4.4	Paras 7.5.59 to 7.5.61 and Table 8-1	Risks and accidents associated with hazardous and large loads - all phases	The Scoping Report proposes to scope out an assessment of risks and accidents associated with hazardous and large loads, on the basis that there are no particular features of the local road network that would pose a significant risk and any large loads will be managed through the Electronic Service Delivery for Abnormal Loads (ESDAL)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			system. The Inspectorate is content to scope this matter out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.4.5	Paras 7.5.7, 7.5.32, 7.5.37 and 7.5.38 and Figures 7-18 and 7-19	Study area, baseline transport surveys and sensitive receptors	<p>Paragraph 7.5.7 and Figure 7-18 of the Scoping Report identify five routes to access the Site from the Strategic Road Network during construction (Routes 1 to 5). Potential routes to the other parcels from the "Consolidation Hub" are shown on Figure 7-19. Paragraph 7.5.32 describes the Transport and Access study area as having "...initially been identified as the extent of Route One to the Site...". It is unclear why the study area has been limited to Route One.</p> <p>The ES should confirm the final study area for the assessment and justify how this has been selected, with reference to relevant industry guidance, the extent of the likely impacts and locations of sensitive receptors. A plan illustrating the extent of the study area, and the expected route(s) of construction traffic, should be included in the ES. It should be clear how the selected locations for Automatic Traffic Counts (ATC) relate to these route(s). Efforts should be made to agree these details with relevant consultation bodies.</p>
3.4.6	Paras 7.5.10 to 7.5.13	Impacts on users of PRoW or other recreational routes	<p>It is not confirmed at this stage whether the Proposed Development would result in any PRoW, National Cycle Network route or other recreational routes being diverted or stopped up, on either a temporary or permanent basis. This should be confirmed in the ES.</p> <p>The ES should assess impacts to users of PRoW, National Cycle Network routes or other recreational routes (including severance, delay, amenity, fear/ intimidation and safety) during construction,</p>

ID	Ref	Description	Inspectorate's comments
			<p>operation and decommissioning which are likely to result in significant effects.</p> <p>The assessment of impacts on users of PRow should be supported by pedestrian/ user counts where possible, with efforts made to agree the locations for such counts with relevant consultation bodies. Where relevant, the ES should assess potential interactions between aspect assessments (for example traffic and transport, noise, dust, recreation and visual impact). The locations of any diversions or closures should be illustrated on suitable figures in the ES.</p>

3.5 Air Quality

(Scoping Report Section 7.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Paras 7.6.13 and 7.6.14	Quantitative assessment of construction phase road traffic emissions (if relevant screening criteria in IAQM and Environmental Protection UK guidance ³ are not exceeded)	If the predicted numbers of construction traffic movements generated by the Proposed Development alone or cumulatively would demonstrably not meet or exceed the relevant indicative criteria for air quality assessment set out in the IAQM guidance ³ , as relevant to each of the affected roads used for construction traffic (once the route has been confirmed), the Inspectorate agrees that a quantitative assessment of construction phase road traffic emissions can be scoped out of the ES. The Project Description chapter of the ES should clearly set out the likely number and type of vehicle movements during the construction phase (alone and cumulatively). Where predicted construction traffic flows meet or exceed the criteria, quantitative assessment of construction phase road traffic emissions should be scoped into the ES.
3.5.2	Paras 7.6.20 and 7.6.43 and Table 8-1	Non-Road Mobile Machinery (NRMM) emissions - all phases	The Scoping Report proposes to scope out emissions from NRMM as these will be temporary, localised and controlled through a CEMP. The ES should demonstrate how relevant mitigation measures would be delivered and secured, through cross reference to the outline CEMP and the dDCO. Subject to this, the Inspectorate agrees that significant air quality effects from NRMM are unlikely and is content that this matter can be scoped out.
3.5.3	Paras 7.6.21,	Shipping emissions – all phases	The Scoping Report proposes to scope out emissions from shipping materials to Holyhead Port as it is likely that construction materials

³ Institute of Air Quality Management (IAQM) (2017) Land-Use Planning & Development Control: Planning for Air Quality

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	7.6.39 and 7.6.43 and Table 8-1		<p>will be transported on existing fleet, meaning additional shipping movements will not be required. It is not stated whether additional shipping movements could be required during decommissioning.</p> <p>The Inspectorate agrees that this matter can be scoped out of further assessment in the Air Quality section of the ES.</p>
3.5.4	Paras 7.6.22, 7.6.24, 7.6.40 and 7.6.43 and Table 8-1	Road traffic emissions - operation and decommissioning	<p>The Scoping Report proposes to scope out operational road traffic emissions as operational traffic will be limited to staff undertaking maintenance and repairs of solar panels. The Inspectorate agrees that the number of vehicle trips generated by the operation and maintenance of the Proposed Development are unlikely to result in significant effects, and this matter can be scoped out of further assessment.</p> <p>Regarding decommissioning, the Scoping Report states that the assessment of road traffic emissions over the construction phase is considered to be a worst-case scenario for the decommissioning phase, so a separate assessment of road traffic emissions during the decommissioning phase is not proposed to be undertaken. In the absence of information such as evidence demonstrating that decommissioning activities would not result road traffic emission effects greater than construction or clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter out from the assessment. Accordingly, the ES should include an assessment of road traffic emissions during decommissioning, or provide information demonstrating agreement with the relevant consultation bodies and the absence of LSE.</p> <p>The Project Description chapter of the ES should clearly set out the likely number and type of vehicles required for operation, maintenance and decommissioning.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.5	Paras 7.6.23 and 7.6.41 and Table 8-1	On-site emissions – operation	The Scoping Report proposes to scope out operational phase emissions from on-site infrastructure as no pollutant emissions are anticipated. The Inspectorate is content that on-site emissions during operation of the Proposed Development are unlikely to give rise to significant effects. This matter may be scoped out of further assessment.
3.5.6	Paras 7.6.12, 7.6.25, 7.6.34 and 7.6.43 and Table 8-1	Dust emissions – all phases	<p>Paragraph 7.6.43 of the Scoping Report proposes that a "<i>Qualitative assessment of fugitive dust emissions during the construction phase</i>" is scoped out of the ES. This appears to contradict paragraph 7.6.12, which states "<i>A qualitative construction phase dust assessment will be undertaken in accordance with the Institute of Air Quality Management (IAQM) guidance to determine the risk of dust emissions associated with earthworks, construction and trackout activities</i>", meaning the Applicant's proposed approach is unclear.</p> <p>For the avoidance of doubt, the Inspectorate considers that a qualitative assessment of dust emissions arising from activities during construction and decommissioning, using the IAQM guidance, should be provided. The ES should describe the measures relied upon to manage dust emissions during construction and decommissioning of the Proposed Development. It should be clear how all mitigation measures would be delivered and secured, through cross reference to the outline CEMP and the dDCO.</p> <p>The Inspectorate is content that dust emissions can be scoped out of further assessment for the operational phase.</p>
3.5.1	Para 7.6.44	Standalone Air Quality ES Chapter	The Scoping Report proposes that air quality will be assessed within an 'Other Environmental Topics' chapter rather than in a standalone ES Chapter. The Inspectorate has considered the nature and

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			characteristics of the Proposed Development and is content with this approach.

ID	Ref	Description	Inspectorate's comments
3.5.2	Table 7.27 and 7.28	IoACC air quality monitoring (AQM) locations	The locations of the IoACC AQM locations in relation to the Proposed Development should be illustrated on a plan in the ES.

3.6 Noise

(Scoping Report Section 7.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Para 7.7.2	Noise and vibration effects on ecological and heritage receptors from the Noise ES Chapter	The Scoping Report proposes that noise and vibration effects on ecological and heritage receptors are scoped out of the Noise ES Chapter and are instead considered in the Ecology and Biodiversity and Cultural Heritage ES Chapters. The Inspectorate is content with this approach.
3.6.2	Para 7.7.40 and Table 8-1	Tranquillity assessment – construction and decommissioning	The Scoping Report proposes to scope out this matter on the basis of the temporary nature of effects. Considering the rural location of the Proposed Development, likely low background noise levels and proximity to sensitive receptors, the Inspectorate does not agree that this matter can be scoped out. Accordingly the ES should include an assessment of this matter or the information demonstrating agreement with the relevant consultation bodies and the absence of an LSE.
3.6.3	Paras 7.7.35 and 7.7.41	Noise and vibration from road traffic - operation	The Scoping Report proposes to scope out noise and vibration from road traffic during operation of the Proposed Development, as vehicle movements relating to routine maintenance are expected to be very limited. The Inspectorate agrees that the number of vehicle trips generated by the operation and maintenance of the Proposed Development are unlikely to result in significant effects. This matter can be scoped out of further assessment.
3.6.4	Paras 7.7.36 and 7.7.41	Vibration from electrical plant - operation	The Scoping Report proposes to scope out this matter as the electrical plant used is expected to generate negligible levels of vibration at the project boundary.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Considering the nature and characteristics of the operational Proposed Development, the Inspectorate is content to scope this matter out of further assessment. However, the ES should describe the potential sources of vibration arising from the operation of relevant components including the substations, as well as any measures to control emissions and confirmation of how these are secured through the dDCO or other legal mechanism.
3.6.5	Table 8-1	Noise from fixed plant and equipment (including low frequency noise) – construction and decommissioning	The Inspectorate agrees that any noise from fixed plant and equipment during construction and decommissioning (eg during equipment testing/ commissioning) is not likely to result in significant effects. This matter can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.6.6	Paras 7.7.5 and 7.7.9	Sensitive receptors and baseline survey	<p>Paragraph 7.7.9 of the Scoping Report states that a baseline noise survey will be undertaken at "locations representative of the noise-sensitive receptors identified". Specific noise-sensitive receptors have not been identified at this stage.</p> <p>The ES should explain the basis on which receptor locations were determined to be representative, with reference to relevant information including noise contour mapping. Efforts should be made to agree the sensitive receptors and locations for baseline noise survey with relevant consultation bodies.</p>
3.6.7	Paras 7.7.23 and 7.7.24	Study area	The study area for noise is defined in the Scoping Report as 500m from the boundary of the potential solar development areas, Project Substation and BESS and 10m from the edge of the road for construction traffic (using a notional receptor).

ID	Ref	Description	Inspectorate's comments
			The ES should explain how the study area(s) have been selected with reference to extent of the likely impacts of the Proposed Development and relevant supporting evidence such as modelling and/ or relevant guidance.

3.7 Ground Conditions

(Scoping Report Section 7.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Para 7.8.38	Mineral extraction – all phases	The Applicant proposes to scope this matter out on the basis that the Scoping Study Area is not located within a Mineral Safeguarding Area and that given the UNESCO geopark status, mineral extraction is not considered to be viable and significant effects on mineral extraction are not likely to occur. The Inspectorate agrees that on the basis that the site is not located within a Mineral Safeguarding Area, this matter can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.7.2	Para 7.8.38	Location of Mineral Safeguarding Area	The Scoping Report refers to the dormant Mynydd Paris mine located 1km east of the Scoping Study Area which is stated to be the only Mineral Safeguarded Area nearby. The ES should include a figure identifying the location and extent of any mineral safeguarding in close proximity to the Proposed Development.
3.7.3	Paras 7.8.12, 7.8.13 and Reference 7-68	Historic ground investigation report on the former Shell site.	The Scoping Report states that the ground investigation report (Ref 7-68) will be reviewed as part of the Phase 1 Desk Study to inform the Preliminary Environmental Information Report (PEIR). A preliminary ground investigation would be undertaken within the former Shell site if reliance cannot be gained on the third party report. The Applicant should seek agreement if possible, with the relevant consultation bodies on the scope of any further preliminary ground investigation should this be required to inform the ES baseline. Where

ID	Ref	Description	Inspectorate's comments
			third party reports inform the ES baseline, their validity and relevance should be fully justified within the ES.

3.8 Soils and Agriculture

(Scoping Report Section 7.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Paras 7.9.36 and 7.9.39	Effects on soils and land quality - operation	<p>The Applicant proposes to scope this matter out on the basis that land under and around the PV arrays would be kept in grassland use and potentially farmed, and that this agricultural activity should have no adverse effects on soil resource or agricultural land quality during operation. The Inspectorate considers that the anticipated 60-year lifespan of the Proposed Development represents a long-term impact which should be reflected in the assessment conclusions accordingly. The ES should provide evidence to support the statement in paragraph 7.9.36 of the Scoping Report that there would be no adverse effects on soil resource or agricultural land quality during operation. If significant effects on soil and land quality are likely to occur during operation, these should be assessed in the ES.</p> <p>Where the ES relies upon agricultural practices as mitigation for soils and land quality, the ES should demonstrate that the land is not subject to restrictive covenants that would prevent such use and that such mitigation is secured in respect of the operation of the Proposed Development.</p>
3.8.2	Table 8-1	Effects on farm businesses, agricultural enterprises and land use – decommissioning	<p>Limited information has been provided with regard to the effects on farm businesses, agricultural enterprises and land use during the decommissioning phase. Due to the lack of information provided, the Inspectorate does not agree to scope this matter out.</p> <p>As noted above, any proposals for restoration of the site to agricultural or other use should be described in the ES, with reference to the proposed outline Decommissioning Environmental Management Plan (DEMP).</p>

ID	Ref	Description	Inspectorate's comments
3.8.3	Paragraph 7.9.32	Soil Management Plan (SMP)	The Scoping Report states that a SMP will be produced, detailing measures to mitigate adverse effect to soils. For clarity, a draft/outline version should be provided with the application and appropriately secured via the dDCO.
3.8.4	Paragraph 7.9.31	Mitigation	The Scoping Report provides limited information with regard to the avoidance of works in areas of Best and Most Versatile (BMV) agricultural land. In addition to soil management measures, the ES should explain how the design has taken into account BMV land in order to avoid, prevent, or reduce any potential LSE on BMV land or explain why this is not feasible.
3.8.5	Paragraph 7.9.14	Study area	The Scoping Report states that the study area is the Scoping Study Area in addition to adjoining agricultural land if that might be affected. The ES should provide a clear justification for the extent of the study area chosen and how this relates to the extent of the likely impacts. The study area should be clearly depicted on figures to aid understanding.
3.8.6	Paragraph 7.9.6, 7.9.7 and 7.9.8	Agricultural Land Classification (ALC) survey	<p>The Scoping Report notes that a ALC survey will be undertaken at a semi-detailed survey level with samples taken regularly on a 200m grid. It is further stated that this may then be supplemented with detailed survey in locations where there is expected to be soil disturbance or where it is considered important to determine the grade boundaries at a detailed scale.</p> <p>The Applicant should make efforts to agree the locations and numbers of soil samples to be taken with relevant consultation bodies. This should be used to support the assessment of effects on BMV agricultural land from the Proposed Development.</p>

ID	Ref	Description	Inspectorate's comments
3.8.7	Para 7.8.4	Peat soils	<p>Limited information has been provided with regards to the presence of peat soils within the site. Given the potential for disturbance of peat soils, the ES should map any peat soils present within the site and demonstrate how effects on peat deposits have been avoided.</p> <p>Any LSE on peat soils should be assessed within the ES (for example, loss or disturbance).</p>

3.9 Water Resources

(Scoping Report Section 7.10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Paras 7.10.46 and 7.10.50	Potable water - all phases	<p>The Scoping Report states that the use and consumption of potable water during construction has the potential to affect water resource availability within the local region. This matter is proposed to be scoped out on the basis that the effect would be temporary and of a minor magnitude.</p> <p>The Inspectorate does not consider that sufficient information has been provided at this time to justify scoping this matter out. The ES should provide details relating to potable water supply during construction (and during operation and decommissioning should potable water be required during these phases) and provide an assessment of these matters where there is potential for LSE to occur or demonstrate the absence of likely significant effects with agreement from the relevant consultation bodies.</p>
3.9.2	Paras 7.10.47 and 7.10.50	Foul water (quantity and quality) – all phases	<p>The Scoping Report proposes to scope this matter out on the basis that there would be no foul water infrastructure associated with the operation of the Proposed Development. It is further stated that foul water generated during construction has the potential to adversely affect available treatment capacity, and that this is not expected to be significant due to the temporary nature and minor magnitude of the effect.</p> <p>The Inspectorate does not consider that sufficient detail has been provided regarding how foul water will be dealt with during construction and operation. The ES should clearly set out how foul water will be dealt with and include an assessment of these matters where there is potential for a LSE to occur, or demonstrate the</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			absence of a LSE with agreement from the relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
3.9.3	Table 7-58	Effects on health resulting from changes to water quality or availability – construction and decommissioning	<p>In relation to water quality or availability, Section 7.14 of the Scoping Report (Health) states that there are potential health effects during the construction and decommissioning phases associated with the presence of agricultural land and the risk of contamination at the former Shell site, which will be outlined in the Water Resources ES Chapter.</p> <p>Section 7.10 of the Scoping Report (Water Resources) does not clearly commit to an assessment of these matters. For the avoidance of doubt, these matters should be assessed where there is potential for LSE to occur, unless otherwise agreed with relevant consultation bodies.</p>
3.9.4	Para 7.10.35 and Figure 7-24	Study area	<p>The Scoping Report does not clearly justify the water resources study area displayed in Figure 7-24.</p> <p>The Inspectorate considers that the ES should clearly define the study area based on the Zol, the hydrology of the site and potential for significant effects. Consideration of upstream receptors should also be included where appropriate.</p>
3.9.5	Paras 1.2.27 and 1.2.28 and Table 7-42	Water Framework Directive	The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 have been referenced within the Scoping Report; however, the water resources chapter of the Scoping Report does not clearly commit to a Water Framework Directive (WFD) assessment.

ID	Ref	Description	Inspectorate's comments
			<p>The Inspectorate advises that the ES should include an assessment of the potential impact of the Proposed Development on WFD waterbodies. The Applicant's attention is drawn to the Inspectorate's Advice Note Eighteen: The WFD in this regard. The Inspectorate also refers the Applicant to NRW's scoping consultation response (Appendix 2 of this Opinion) regarding the levels of receptor sensitivity provided at Table 7-42 of the Scoping Report and the presence of groundwater dependent terrestrial ecosystems within the water resources study area.</p>
3.9.6	Paras 7.10.30 and 7.10.31	Water quality monitoring and Hydrological/hydrogeological modelling	<p>The Scoping Report does not propose any water quality sampling/ monitoring or provide a justification for this approach.</p> <p>The ES should describe the existing quality of water affected by the Proposed Development. Given that there are waterbodies within the site boundary, the Proposed Development site is located within multiple WFD catchments, and construction impacts may alter water quality (as highlighted in paragraph 7.10.47), surface and ground water quality monitoring should be undertaken to inform the baseline and reported in the ES. Hydrological modelling should be undertaken to provide an initial assessment of the potential changes to the hydrological system due to the Proposed Developments construction and operation. The Applicants attention is drawn to NRW's consultation response (Appendix 2 of this Scoping Opinion) regarding the establishment of a monitoring program, for the construction, operational, and decommissioning phases of the Proposed Development.</p>
3.9.7	Paras 3.2.21 and 7.3.14	Horizontal Directional Drilling	<p>The Inspectorate notes that there is potential for Horizontal Directional Drilling (HDD) to be used to cross beneath existing buried utilities, roads, hedges and drains. The ES should assess impacts from any use of HDD on water resources receptors which are likely to result in significant effects. Should drilling fluid be used in</p>

ID	Ref	Description	Inspectorate's comments
			construction, a breakout plan should be produced, submitted and secured in the application.
3.9.8	Para 7.10.52	Guidance	The Applicant's attention is drawn to NRW's response to consultation (Appendix 2 of the Scoping Opinion) regarding aligning with the current Technical Advice Note 15: Development and Flood Risk (Welsh Assembly Government, July 2004) by ensuring that the Proposed Development is directed towards suitable land which is not at flood risk.
3.9.9	Para 7.10.23	Drinking Water Protected Areas	The Inspectorate notes that Cefni Reservoir, a Drinking Water Protection Area is located in proximity to the site. Paragraph 7.10.23 does not identify Cefni Reservoir as a receptor. The ES should reflect the use of Alaw Reservoir and the Cefni Reservoir as the main drinking water sources for Anglesey and should provide an assessment where there is the potential for LSE to occur as a result of impacts to water quality for these receptors. Efforts should be made to agree the approach and receptors to be included within the assessment with relevant consultation bodies.
3.9.10	Para 7.10.19	Receptors	The Scoping Report does not refer to private groundwater supplies although several are located in the area. For the avoidance of doubt, any potentially impacted permitted or private water supplies should be identified and included in the assessment where there is the potential for LSE to occur. The Applicant's attention is drawn to NRW's scoping consultation response in this regard (Appendix 2 of this Opinion).
3.9.11	Paras 7.10.44 and 7.10.45	Water quality	The ES should include a description of any measures proposed to reduce pollutant runoff into nearby watercourses, for example, design measures or best practice measures to be secured via the outline CEMP or within the drainage strategy. The outline CEMP should make

ID	Ref	Description	Inspectorate's comments
			reference to Guidance for Pollution Prevention 5 (GPP5) and include appropriate measures to be followed from GPP5.
3.9.12	Para 7.10.45	Water quality mitigation - operation	The Scoping Report refers to the potential for the Proposed Development to adversely affect surface water and ground water quality without appropriate mitigation. Mitigation measures should be detailed within the ES, along with the proposed method by which these are to be secured within the DCO. Detail should be provided regarding any chemicals relating to the BESS, emergency plans and any precautions that will be in place to contain any firefighting water runoff produced and how firefighting water runoff would be disposed of without causing pollution.

3.10 Climate Change

(Scoping Report Section 7.11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 7-50 and Table 8-1	Climate Change Resilience and In-combination Climate Impact Assessment relating to extreme weather events and changes in temperature, precipitation and wind patterns – operation and decommissioning	<p>Table 8-1 proposes to scope these matters out for the operation and decommissioning phases. This is in contradiction to the information provided within Scoping Report Climate Change Chapter and Table 7-50.</p> <p>For the avoidance of doubt, the ES should provide an assessment of these matters for all phases of the Proposed Development where there is potential for LSE to occur. The Applicant should ensure that the ES provides consistent information throughout.</p>
3.10.2	Para 7.11.35, Table 7-50 and Table 8-1	Sea level rise – all phases	<p>The Scoping Report proposes to scope this matter out on the basis that the site is not located in an area susceptible to sea level rise (based on the review of the Flood Risk Assessment Wales Map), and no in-combination effects with other environmental disciplines are predicted.</p> <p>Given the sites low susceptibility to sea level rise, the Inspectorate agrees to scope this matter out of further assessment for all phases.</p>
ID	Ref	Description	Inspectorate's comments
3.10.3	Para 7.11.9	Greenhouse gas (GHG) impact assessment	The Inspectorate welcomes the Applicants proposed project lifecycle approach for the GHG impact assessment and considers that the assessment should also include:

ID	Ref	Description	Inspectorate's comments
			<ul style="list-style-type: none"> • an explanation of the steps that have been taken to drive down the climate change impacts at each stage of the project lifecycle; • how reduction in energy demand and consumption during operation has been prioritised in comparison with other measures; • how operational emissions have been reduced as much as possible through the application of best available techniques for that type of technology; and • whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework.
3.10.4	Paras 7.11.24 and 7.11.25	GHG impact assessment assumptions	The GHG impact assessment within the ES should clearly describe any assumptions made in determining the quantification of any emissions reduction resulting from the Proposed Development such as the displacement of fossil fuel power generation.
3.10.5	n/a	GHG emissions and design flexibility	Where flexibility is being sought on the types of panels or batteries within the Proposed Development, the ES should present a worst-case assessment for the options under consideration.

3.11 Glint and Glare

(Scoping Report Section 7.12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Para 7.12.28	Detailed assessment of glint and glare impacts on aviation receptors over 5km from the Site – all phases	The Scoping Report scopes in aviation receptors within 30km of the Site but proposes that a detailed assessment is undertaken only for those aviation receptors within 5km (ie only RAF Mona). The Inspectorate is content with this approach. A detailed assessment of glint and glare impacts on aviation receptors over 5km from the Site can be scoped out.
3.11.2	Para 7.12.29	Impacts from glint and glare on ground-based receptors located over 1km from the Site – all phases	<p>The Scoping Report (para 7.12.10) considers that a 1km study area for ground-based receptors is appropriate, as this is based on best practice and has been widely accepted across the UK and Ireland and contains a variety of ground-based receptors in all directions from the Site.</p> <p>The Inspectorate agrees that impacts from glint and glare on ground-based receptors located over 1km from the Site are unlikely to result in significant effects; this matter can be scoped out of further assessment.</p> <p>The Applicant is advised to use the ZVI to be developed for the LVIA to assist with identifying ground-based sensitive receptors with potential views of the site, which may therefore be affected by glint and glare. Effort should be made to agree the specific receptors for inclusion in the assessment with relevant consultation bodies. In addition to residential, road and PRow receptors, the ES should assess impacts to cultural heritage assets and their settings, where significant effects are likely. The locations of the sensitive receptors should be shown on an accompanying plan.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.3	Para 7.12.30	Standalone Glint and Glare ES aspect chapter	<p>The Scoping Report proposes to scope out a standalone Glint and Glare ES aspect chapter. The Glint and Glare Assessment would instead be set out in full in a Technical Appendix to the ES and summarised within the 'Other Matters' chapter of the ES.</p> <p>The Inspectorate is content with this approach. The 'Other Matters' chapter of the ES should identify any significant effects resulting from glint and glare. ES aspect chapters (eg LVIA, Cultural Heritage) should cross refer to the Glint and Glare Assessment where relevant.</p>
3.11.4	Para 7.12.31	Impacts from glint and glare - construction and decommissioning	<p>The Inspectorate has considered the nature and characteristics of the Proposed Development and agrees that significant effects are not likely. An assessment of impacts from glint and glare during construction and decommissioning can be scoped out of the ES.</p>
3.11.5	Para 7.12.32	Impacts from glint and glare on rail receptors - all phases	<p>The Scoping Report states that there are no rail receptors located within 1km of the Site and therefore, no significant effects on rail receptors are anticipated. The Inspectorate agrees that significant effects are not likely and that impacts from glint and glare on rail receptors can be scoped out of further assessment.</p>

ID	Ref	Description	Inspectorate's comments
3.11.6	n/a	n/a	n/a

3.12 Socio-economics

(Scoping Report Section 7.13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Paras 7.13.35	Spending associated with the workers – construction and decommissioning	<p>The Scoping Report proposes to scope this matter out on the basis that this would be a temporary effect during operation and decommissioning and that the effect is unlikely to be significant when compared to the annual expenditure in the nearest retail centre to the site.</p> <p>In the absence of confirmed numbers of construction workers and greater detail on potential receptors for workforce expenditure, the Inspectorate does not consider that there is sufficient evidence to support this. The ES should provide an assessment of this matter where there is potential for LSE to occur.</p>
3.12.2	Para 7.13.51	Spending associated with the workers – operation	<p>The Scoping Report proposes to scope this matter out on the basis that due to the relatively low number of operational workers onsite, significant changes to local expenditure are not expected to occur.</p> <p>The Inspectorate is content to scope this matter out on this basis, however the ES should confirm the number and type of jobs that would be created during the operational phase.</p>
3.12.3	Para 7.13.38	Disruption to local businesses – construction and decommissioning	<p>The Scoping Report proposes to scope this matter out on the basis that there is not a high density of businesses in the vicinity of the site that are likely to experience disruption from construction and decommissioning impacts. The Inspectorate notes that impacts to agricultural businesses associated with the site would be considered within the Soils and Agriculture aspect chapter of the ES.</p> <p>On this basis, the Inspectorate agrees to scope out disruption to local businesses from the socio-economic assessment. Amenity impacts on</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			local businesses as sensitive receptors should be clearly address in the relevant ES aspect chapters.
3.12.4	Para 7.13.39	Changes in demand for health and social care - construction and decommissioning	<p>The Scoping Report proposes to scope this matter out on the basis that construction workers will be temporary, and through implementation of good practice throughout construction and decommissioning (to be set out within the proposed outline CEMP), no significant effects on health provision of either General Practitioners (GPs) or the local Accident and Emergency service are anticipated. The Applicant proposes to assess any human health effects arising through changing demand for health and social care within the Health ES aspect chapter.</p> <p>The Inspectorate is content with this approach and agrees to scope this matter out of the socio-economic assessment.</p>
3.12.5	Paras 7.13.40 and 7.13.57	Access to open space and PRowS – all phases	<p>The Scoping Report proposes to scope this matter out of the socio-economic assessment on the basis that an assessment would be provided within the Health ES aspect chapter.</p> <p>The Inspectorate is content with this approach and agrees to scope this matter out of the socio-economics assessment.</p>
3.12.6	Paras 7.13.42 and 7.13.52	Changes in crime and community safety – all phases	<p>Security is proposed during construction and operation through installation of security fencing, CCTV, and lighting. The Inspectorate considers that significant effects are not likely in relation to crime and community safety and agrees to scope this matter out.</p>
3.12.7	Paras 7.13.45 and 7.13.58	Changes in commuting patterns – all phases	<p>The Scoping Report states that significant impacts on commuting patterns are unlikely given the low proportion of workers travelling near the site and limited businesses in the vicinity of the site. The Applicant states that specific driver delay impacts will be discussed in the Transport and Access aspect chapter and that if a significant</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>effect is concluded for this matter, the socio-economic assessment will scope this effect in for completeness.</p> <p>The Inspectorate is content with this approach.</p>
3.12.8	Para 7.13.46	Operational employment	<p>The Scoping Report proposes to scope this matter out for the operational phase on the basis that the number of direct operational workers are expected to be low.</p> <p>The Inspectorate is content to scope this matter out on this basis, however the ES should confirm the number and type of jobs created during the operational phase.</p>
3.12.9	Para 7.13.56	Impact on local housing affordability – all phases	<p>The Scoping Report proposes to scope this matter out on the basis that there are a limited number of dwellings in the vicinity of the site (4% of Anglesey's total housing stock within 1km of the site) and that this combined with uncertainty over house price impacts, the temporary nature of the Proposed Development and landscaping mitigation measures is considered unlikely to result in significant effects on housing affordability.</p> <p>Having regard to the location, nature and characteristics of the Proposed Development, the Inspectorate agrees that impacts on local housing affordability are not likely to result in significant effects. This matter can be scoped out of the ES.</p>

ID	Ref	Description	Inspectorate's comments
3.12.10	Paras 7.13.17 and 7.13.18	Study area	The ES should include a clear justification as to how the study areas have been defined. The study areas and receptors should be depicted on corresponding figures to aid understanding. It should be clear how

ID	Ref	Description	Inspectorate's comments
			the selected study areas relate to the extent of the likely impacts from the Proposed Development.
3.12.11	Para 7.13.50	Guidance	The Applicant's attention is drawn to the IoACC's recently adopted updated Destination Management Plan (DMP) for the period 2023 to 2028.

3.13 Health

(Scoping Report Section 7.14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Table 7-58	Health related behaviours (physical activity) – all phases	The Scoping Report proposes to scope out an assessment of the physical activity health determinant for all phases, as the potential impacts will be considered in the Health ES Chapter under the open space, leisure and play health determinant instead. The Inspectorate is content with this approach.
3.13.2	Table 7-58	Health related behaviours (risk-taking behaviour) – all phases	The Scoping Report proposes to scope out health effects related to risk-taking behaviour on the basis that the expected number of construction workers is unlikely to significantly alter community health behaviours. The Inspectorate considers that significant effects in terms of health are not likely and agrees this matter can be scoped out of further assessment.
3.13.3	Table 7-58	Social environment (housing) – operational	The Scoping Report states that the permanent workforce will comprise only a very small number of staff and is unlikely to impact housing supply. The Inspectorate is content that significant effects in terms of health are not likely and that this matter can be scoped out of further assessment.
3.13.4	Table 7-58	Social environment (relocation) – all phases	The Scoping Report proposes to scope out health effects related to relocation for all phases of the Proposed Development, as no acquisition of any homes or community facilities is required. The Inspectorate is content to scope this matter out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.5	Table 7-58	Social environment (open space, leisure and play) – construction and decommissioning	<p>The Scoping Report proposes to scope out health effects related to open space, leisure and play for the construction and decommissioning phases, on the basis that any disturbance to PRoW or open space will be temporary and minor in nature and extent. An assessment is proposed for the operational phase.</p> <p>The Inspectorate is content that significant effects in terms of health are not likely during the construction and decommissioning phases and that this matter can be scoped out.</p>
3.13.6	Table 7-58	Social environment (transport modes, access and connections) – operation	<p>The Scoping Report proposes to scope out health effects related to transport modes, access and connections for the operational phase of the Proposed Development, on the basis that the volume of associated traffic will be negligible. The Inspectorate agrees that the number of vehicle trips generated by the operation and maintenance of the Proposed Development are unlikely to result in significant effects on health and is content to scope this matter out of further assessment.</p>
3.13.7	Table 7-58	Social environment (community safety) – all phases	<p>The Scoping Report proposes to scope out health effects related to community safety for all phases of the Proposed Development, on the basis that security measures such as security fencing, CCTV and lighting will be in place to minimise safety risks to the local community. The Inspectorate is content to scope this matter out of further assessment.</p>
3.13.8	Table 7-58	Social environment (social participation, interaction and support) – all phases	<p>The Scoping Report proposes to scope out health effects related to social participation, interaction and support for all phases, on the basis that the Proposed Development does not affect land used for community purposes, and any indirect impacts are discussed</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			elsewhere in the Scoping Report. The Inspectorate is content to scope this matter out on this basis.
3.13.9	Table 7-58	Bio-physical environment (climate change and adaptation) – construction and decommissioning	<p>The Scoping Report proposes to scope out this matter on the basis that carbon and climate altering pollutant emissions are not expected to be of the scale to have significant health effects during these temporary phases, as a CEMP would be prepared to ensure that harmful machinery emissions are minimised.</p> <p>On the basis that impacts on human health from construction and decommissioning phase road traffic emissions are to be assessed in the Air Quality section of the 'Other Environmental Topics' ES Chapter, the Inspectorate is content to scope this matter out of the Health ES Chapter. The Health ES Chapter should provide clear cross-referencing to where the relevant impacts on human health are considered.</p>
3.13.10	Table 7-58	Bio-physical environment (air quality) – all phases	<p>The Scoping Report proposes to scope out health effects resulting from changes to air quality during the construction and decommissioning phases, stating that dust emissions would be managed via a CEMP and are not expected to be significant. On the basis that impacts on human health from dust emissions during construction and decommissioning are assessed in the Air Quality section of the 'Other Environmental Topics' ES Chapter (as per the Inspectorate's comments in Table 3.5 above), the Inspectorate is content that this matter can be scoped out of the Health ES chapter. The Health ES Chapter should provide clear cross-referencing to where the relevant impacts on human health are considered.</p> <p>The Scoping Report proposes to scope out health effects resulting from changes to air quality during the operational phase as traffic flows are expected to be minimal and no combustion plant would be present on site. The Inspectorate agrees that the number of vehicle</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			trips generated by operation and maintenance of the Proposed Development are unlikely to result in significant effects and is content to scope this matter out for the operation/ maintenance phase.
3.13.11	Table 7-58	Bio-physical environment (water quality and availability) – operation	<p>The Scoping Report proposes to scope out health effects related to water quality and availability during the operational phase on the basis that routine checks and maintenance of the BESS would minimise water related risks to human health. It is stated that any risks would be managed through good practice and secured through management plans.</p> <p>The ES should demonstrate how relevant measures to manage any risks would be delivered and secured, through cross reference to draft/ outline management plan(s) and the dDCO. Subject to this, the Inspectorate agrees that significant effects are not likely and is content that health effects related to water quality and availability during the operational phase can be scoped out of further assessment.</p>
3.13.12	Table 7-58	Bio-physical environment (land quality) – all phases	<p>The Scoping Report proposes to scope out health effects related to land quality, stating that the agricultural land quality or soil resource is unlikely to be significantly affected during any phase of the Proposed Development. On this basis and having regard to the nature and characteristics of the Proposed Development, the Inspectorate is content that this matter can be scoped out of further assessment.</p> <p>The Scoping Report states that if significant adverse effects are identified in ES Chapter 13 (Soils and Agriculture), "<i>consideration will be given</i>" to scoping these effects into the human health assessment. Should significant adverse effects be identified in ES Chapter 13 (Soils and Agriculture) for any phase, the ES should assess impacts on health where significant effects are likely.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.13	Table 7-58	Bio-physical environment (radiation) – all phases	<p>The Scoping Report proposes to scope out health effects related to radiation for all phases of the Proposed Development on the basis that construction works will not involve the use of electro-magnetic field (EMF) producing infrastructure and EMF produced during operation would be at very low levels that would not adversely affect residential receptors.</p> <p>The voltage of underground export cables between the onsite substation and the proposed National Grid substation is likely be 400kV. In line with relevant guidance (DECC Power Lines: Demonstrating compliance with EMF public exposure guidelines, A Voluntary Code of Practice 2012), cables above 132kV have potential to cause EMF effects.</p> <p>The Inspectorate is content that an assessment of cables/ substations up to and including 132kV can be scoped out further assessment.</p> <p>The ES should provide an assessment of any LSE on human health receptors arising from EMF from cables/ substations above 132kV. This should consider residential and recreational receptors. The ES should describe any necessary mitigation measures relevant to EMF (for example a minimum depth for cable burial) and explain how such measures are secured through the dDCO or other legal mechanism.</p>
3.13.14	Table 7-58	Institutional and built environment (health and social care services) – operation	<p>The Scoping Report proposes to scope out effects related to health and social care services for the operational phase of the Proposed Development, stating that the very low numbers of operational workers will mean demand for healthcare services will not significantly increase. The Inspectorate agrees that the small number of staff required for the operation and maintenance of the Proposed Development are unlikely to result in significant effects and is content to scope this matter out of further assessment.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.15	Table 7-58	Institutional and built environment (built environment) – all phases	<p>The Scoping Report proposes to scope out an assessment of the built environment health determinant for all phases, stating that construction would not significantly affect features of the built environment with respect to human health. Potential operational effects are proposed to be considered in the Health ES chapter under the community identity health determinant instead, to avoid repetition.</p> <p>The Inspectorate is content with this approach and agrees that the built environment health determinant can be scoped out of further assessment for all phases of the Proposed Development.</p>
3.13.16	Table 7-58	Institutional and built environment (wider societal infrastructure and resources) – construction and decommissioning	<p>The Scoping Report proposes to scope out health effects related to wider societal infrastructure and resources for the construction and decommissioning phase of the Proposed Development, as there are no anticipated effects on existing electricity supplies or other societal infrastructure and resources. The Inspectorate is content to scope this matter out of further assessment.</p>

ID	Ref	Description	Inspectorate's comments
3.13.17	Para 7.14.2	Guidance	<p>The ES assessment should also utilise the guidance produced by the UK Health Security Agency's (UKHSA) predecessor (Public Health England): 'Advice on the content of Environmental Statements accompanying an application under the NSIP Regime', where relevant.</p>
3.13.18	Para 7.14.9 and 7.14.10	Study area	<p>Paragraph 7.14.9 of the Scoping Report sets out the likely "core study areas" for the health assessment and states that the relevant</p>

ID	Ref	Description	Inspectorate's comments
			<p>technical assessments of the EIA will influence the study area for specific impacts.</p> <p>The ES should clearly set out how study areas relevant to the health assessment have been defined along with a justification as to how they were chosen. The study areas and receptors should be depicted on corresponding figures.</p>

3.14 Major Accidents and Disasters

(Scoping Report Section 7.15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Para 7.15.18	Standalone Major Accidents and Disasters ES Chapter	<p>The Scoping Report proposes to scope out a standalone chapter for major accidents and disasters on the basis that fire hazards relating to the BESS would be considered within an 'Other Matters' chapter of the ES.</p> <p>The Inspectorate agrees to scope out a standalone chapter for major accidents and disasters, on the basis that fire hazards will be assessed elsewhere within the ES and that fire hazard related mitigation such as an outline Battery Storage Safety Management Plan will be submitted as part of the DCO application.</p>
3.14.2	Paras 7.15.11, 7.15.12 and 7.15.13	Transport accidents and flooding from the Major Accidents and Disasters section – all phases	<p>The Scoping Report proposes to scope out the potential effects of transport accidents and flooding on the basis that these matters would be considered in the Transport Assessment and Transport and Access aspect chapter of the ES, Glint and Glare Assessment, FRA and the Water Resources and Ground Conditions aspect chapters of the ES.</p> <p>The Inspectorate agrees to scope these matters out of the Major Accidents and Disasters section of the ES on this basis.</p>
3.14.3	Para 7.15.15 and 7.15.16	Major accident pipelines and COMAH sites – all phases	<p>The Scoping Report proposes to scope this matter out on the basis that there is no potential for any significant adverse effects in relation to major accident pipelines, due to National Grid Gas's 'Guidance for developing solar farms near to gas distribution and transmission pipelines' being followed and protective provisions being included within the DCO.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate agrees to scope this matter out of further assessment provided that the protective provisions are evidenced and secured through the dDCO.
3.14.4	Para 7.15.17	Effects from EMF on residential receptors – all phases	The Inspectorate agrees to scope this matter out of the Major Accidents and Disasters section of the ES, on the provision that effects from EMF are assessed within the Health ES Chapter as set out in Table 3.13 of this Opinion.

ID	Ref	Description	Inspectorate's comments
3.14.5	Para 7.15.7	Definition of significance effects	The Scoping Report states that the EIA Regulations do not include the definition of major accidents and/ or disasters and lists the definitions proposed to be used within the context of the project. The ES should clearly explain and justify what represents a significant effect in terms of EIA for major accidents and/ or disasters.
3.14.6	Para 7.15.8	Guidance	The Scoping Report refers to several guidance documents which have been utilised. The assessment should also refer to the Institute of Environmental Management and Assessment (IEMA) guidance document 'Major Accidents and Disasters in EIA', where relevant.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES⁴

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Welsh Ministers	Welsh Government
The Health and Safety Executive	Health and Safety Executive
The relevant fire and rescue authority	North Wales Fire and Rescue Service
The relevant police and crime commissioner	North Wales Police and Crime Commissioner
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Llanfihangel Esceifiog Community Council
	Bodffordd Community Council
	Llanddyfnan Community Council
	Rhosybol Community Council
	Llangefni Community Council
	Penmynydd Community Council
	Bodedern Community Council
	Llanfachraeth Community Council
	Llanfaethlu Community Council
	Tref Alaw Community Council
	Mechell Community Council
	Llanerchymedd Community Council
	Llanfair-Mathafarn-Eithaf Community Council
	Llaneugrad Community Council

⁴ Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Pentraeth Community Council
	Amlwch Town Council
	Moelfre Community Council
	Llaneilian Community Council
	Llanbadrig Community Council
	Cylch-y-Garn Community Council
The Equality and Human Rights Commission	Equality and Human Rights Commission
Royal Commission on Ancient and Historical Monuments of Wales	Royal Commission on Ancient and Historical Monuments Of Wales
The Natural Resources Body for Wales	Natural Resources Wales
The Civil Aviation Authority	The Civil Aviation Authority
The Passengers Council	Transport Focus
The Disabled Persons Transport Advisory Committee	Disabled Persons Transport Advisory Committee
Office of Rail and Road	Office of Rail and Road
Approved Operator	Network Rail Infrastructure Ltd
The Gas and Electricity Markets Authority	OFGEM
The Water Services Regulation Authority	Ofwat
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
The relevant local resilience forum	North Wales Local Resilience Forum
The Crown Estate Commissioners	The Crown Estate
The relevant local health board	Betsi Cadwaladr University Health Board
The National Health Service Trusts	Health Protection Team, Public Health Wales
	Welsh Ambulance Services Trust

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Velindre NHS Trust
The Office for Nuclear Regulation (the ONR)	The Office for Nuclear Regulation (the ONR)

TABLE A2: RELEVANT STATUTORY UNDERTAKERS⁵

STATUTORY UNDERTAKER	ORGANISATION
The relevant NHS Trust	Health Protection Team, Public Health Wales
	Welsh Ambulance Services Trust
	Velindre NHS Trust
The relevant local health board	Betsi Cadwaladr University Health Board
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Dock and Harbour authority	Holyhead Port Authority
	Amlwch Harbour
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
The relevant Environment Agency	Natural Resources Wales
The relevant water and sewage undertaker	Dwr Cymru (Welsh Water)
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc

⁵ 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	ESP Connections Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Indigo Pipelines Limited
	Independent Pipelines Limited
	Quadrant Pipelines Limited
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Squire Energy Limited
	National Gas
The relevant electricity generator with CPO Powers	Horizon Nuclear Power Wylfa Limited
The relevant electricity distributor with CPO Powers	The Nuclear Decommissioning Authority
	SP Manweb Plc
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited

STATUTORY UNDERTAKER	ORGANISATION
	Harlaxton Energy Networks Limited
	The Electricity Network Company Limited
	Indigo Power Limited
	Independent Power Networks Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))⁶

LOCAL AUTHORITY ⁷
Isle of Anglesey County Council

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Cadw

⁶ Sections 43 and 42(B) of the PA2008

⁷ As defined in Section 43(3) of the PA2008

Welsh Language Commissioner
Trafnidiaeth Canolbarth Cymru (TraCC)
Ministry of Defence
Conwy County Borough Council
Snowdonia National Park Authority
Gwynedd Council

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Amlwch Town Council
Cadw
Isle of Anglesey County Council
Llaneilian Community Council
Llanfair Mathafarn Eithaf Community Council
National Grid Electricity Transmission
NATS Safeguarding
Natural Resources Wales
Network Rail
Office for Nuclear Regulation
Public Health Wales
UK Health Security Agency

From: clerc@cyngortrefamlwch.co.uk
To: [Maen Hir Solar](#)
Cc: [REDACTED]
Subject: Consultation Response - Maen Hir Solar
Date: 11 December 2023 22:35:34

You don't often get email from clerc@cyngortrefamlwch.co.uk. [Learn why this is important](#)

From: clerc@cyngortrefamlwch.co.uk <clerc@cyngortrefamlwch.co.uk>
Sent: 11 December 2023 22:28
To: 'maeshirsolar@planninginspectorate.gov.uk' <maeshirsolar@planninginspectorate.gov.uk>
Cc: Gareth Winston [REDACTED]
Subject: Consultation Response - Maen Hir Solar

Amlwch Town Council appreciate the opportunity from the Planning Inspectorate to respond to the proposed development and look forward to making further representation as appropriate as the planning process progresses.

At a meeting of the full council this evening, the following concerns were noted **in opposition** of the development (in no particular order) –

1. The sheer size of the proposal, its impact on the local environment and community is of great concern.
2. Priority for Grid Capacity should be given to a large-scale development such as Wylfa Newydd that would bring with it thousands of construction opportunities and hundreds of permanent employment opportunities thereafter notwithstanding a positive impact on the supply chain and local contractors. Experience to date shows that renewable development does not offer permanent employment opportunities of scale.
3. Concern that good quality agricultural land used for food production is being lost to energy development where lower grade land, brown field sites and buildings could host panels. The land in question is productive agricultural land surrounded by housing.
4. Will any homes affected by the development, directly or indirectly be compensated for loss of value, quality of life, impact on health, loss of amenity including visibility and glare from further afield
5. Loss of income and employment from tourism opportunities – North Anglesey hosts a number of visitor attractions and accommodation
6. Concern that precedent will be set for further large-scale energy developments to bypass Anglesey County Council and Welsh Government for approval via the Planning Inspectorate, seen as taking away the voice of the local people.
7. North Anglesey and North Wales have experience of large-scale projects, it is essential to provide long term employment opportunities directly, indirectly via contractors on site, and the supply chain. Training opportunities are essential.
8. Employment and training opportunities are essential to grow a balanced economy, to reduce the outward migration of skilled young people from the island and to maintain and safeguard the Welsh Language.
9. Concern was noted with regard to the longevity of the solar panels, the materials used for manufacture, and future disposal of spent panels and associated infrastructure. Concern was noted with regard to the materials used for production of the batteries and whether

sustainably sourced. Should the proposal be developed, assurance is sought that the site be returned to its current state, retaining the natural topography and character.

Carli Evans Thau
Clerk, Amlwch Town Council

Emma Cottam
Senior EIA Advisor
The Planning Inspectorate

Eich cyfeirnod Your reference	EN010156
Ein cyfeirnod Our reference	
Dyddiad Date	5 December 2023
Llinell uniongyrchol Direct line	0300 0250566
Ebost Email:	Cadwplanning@gov.wales

Dear Emma

Prosiect Maen Hir - EIA Scoping Notification

Thank you for your letter of 13 November asking for Cadw's comments on the above.

Cadw, as the Welsh Government's historic environment service, has assessed the characteristics of this proposed development and its location within the historic environment. In particular, the likely impact on designated or registered historic assets of national importance. In assessing if the likely impact of the development is significant Cadw has considered the extent to which the proposals affect those nationally important historic assets that form the historic environment, including scheduled ancient monuments, listed buildings, registered historic parks, gardens and landscapes.

These views are provided without prejudice to the Welsh Government's consideration of the matter, should it come before it formally for determination.

Advice

This advice is given in response to scoping opinion as to the contents of an Environmental Impact Assessment (EIA) that will be submitted in support of an application for the proposed Prosiect Maen Hir.

Assessment

The request for a scoping direction is accompanied by a scoping report with section 7.4 considering Cultural Heritage, with more details being provided by a written scheme of investigation prepared by Cotswold Archaeology included as an appendix.

In general, we agree with the methodologies outlined in these documents that will be used to provide information for the compilation of the Cultural Heritage chapter in the environmental statement. However, we disagree with the 2km proposed study area to consider the potential effect of the proposed development upon the setting of designated historic assets.

Whilst we note the comments in section 7.4.17 of the scoping report, in regard to how solar panels are seen at distance, however the study area proposed for the Landscape and Visual Impact Assessment is 3km and the Zone of Theoretical Impact maps have also been prepared for 3km. Consequently, in our opinion and for internal consistency in the EIA process, the study area to consider potential effect of the proposed development upon the setting of designated historic assets should be 3km not 2km.

We will expect this effect to be considered for all designated historic assets inside 3km of the proposed development (listed in Annex A) in accordance with the Welsh Government guidance given in the document "The Setting of Historic Assets in Wales". We would expect a stage 1 assessment to be carried out for all the designated heritage assets in Annex A, which will determine the need, if necessary, for stages 2 to 4 to be carried out for specific heritage assets.

Yours sincerely

Jenna Arnold

Historic Environment Branch

Annex A

Scheduled Monuments

AN111 Parys Mountain: Windmill, Engine House, Precipitation Pits and Great Opencast
AN124 Pen-y-Fynwent Enclosure
AN078 Bodewryd Standing Stone
AN069 Maen Addwyn
AN030 Bodorwedd Standing Stones
AN135 Dyffryn Adda Copper Furnace and Precipitation Ponds
AN158 Y Werthyr Hillfort
AN039 Bodafon Mountain Early Medieval Homestead
AN040 Bodafon Mountain Hut Groups
AN079 Llifad, Carreglefn
AN067 Carreg Leidr
AN091 Cors-y-Bol Round Barrow
AN109 Porth Wen Brickworks
AN110 Pen-y-Morwyd Round Barrow
AN038 Dinas Gynfor Hillfort
AN070 Llech Golman
AN076 Maen Chwyf
AN077 Lllys Einion Standing Stone
AN080 Standing Stone 410m North of Church
AN090 Glan-Alaw Standing Stone
AN098 Bedd Branwen Round Cairn
AN125 Pen-y-Fynwent Barrow
AN136 Mona Mine Kilns and Sublimation Chambers, Mynydd Parys
AN150 Werthyr standing stone
AN151 Plas Bodafon, standing stone to WNW of

Registered Historic Landscape:

HLW (Gw) 1 Amlwch and Parys Mountain

Listed Buildings:

5334	Plas Bodewryd	II*
5344	Cemaes Mill	II
5345	Tre'r Ddol	II*
5346	Plas Bodafon	II
5348	Church of St Mary	II
5349	Church of St Peirio	II
5350	Capel Peniel and chapel house	II
5354	Church of St Pabo	II*
5355	Church of St Fflewyn	II
5360	Church of St Tyfrydog	II*
5361	National School (former)	II
5362	Ty Mawr	II
5371	Church of St Mary	II
5383	Church of St Mechell	II*
5384	Rectory	II
5386	Crown Terrace	II
5389	Melin Llidiart	II
5390	Church of St Michael	II
5391	Former Post Office	II
5392	Ty Newydd	II
5394	Church of St Cwyllog	II*

5401	Church of St Ceidio	II
5402	Church of St Mary (disused)	II
5403	Church of St Caian	II*
5404	Plas Tregayan	II
5419	Madyn Dysw	II
5420	Bryntirion	II
5421	Mona Lodge	II
5422	Mona Lodge	II
5423	Mona Lodge	II
5424	No.4 Mona Lodge	II
5425	Parys Mountain Windmill	II
5426	Melin Adda	II
5427	Church of St Eleth	II*
5428	Dinorben Arms Hotel	II
5429	English Methodist Chapel with attached schoolroom, including railings to front	II
5715	Harbour Walls of old harbour	II
5716	Mona Windmill	II
5717	Pier at the entrance of the old harbour	II
5718	Lighthouse and watchtower, with attached building at the entrance of the old harbour	II
5719	Dry dock	II
5720	Sail Loft	II
5721	Chimney nearest to the Sail Loft	II
5722	Copper Hoppers	II
5740	Capel Mwd (Capel Newydd) and attached cottage	II
5750	Old National School	II
16575	Dovecote at Plas Bodewryd	II
18903	Eglwys Bresbyteraidd Cymru	II
24031	Capel Bethesda	II
24339	Ty Cefn	II
24453	Lychgate at Church of St Eleth	II
24454	Carmel Independent Chapel and schoolroom	II
24455	Church of Our Lady Star of the Sea, St Winifred	II*
24456	Parc Mawr	II
24457	Ty-newydd	II
24458	Pearl Engine House	II
24459	Former stables-coachhouse at Mona Lodge	II
24563	Sherry	II
24827	Sundial at Church of St Tyfrydog	II
24828	Churchyard wall at Church of St Tyfrydog	II
24829	Rectory	II
24830	Clorach-fawr	II
24831	Clorach-bach	II
24832	Tyn y Pwll	II
24833	Llwydiarth Esgob Farmhouse	II
24834	Melin Esgob	II
24835	Gwredog	II
24836	Range including cornbarn, granary, threshing room and lofted cowhouse at Llwydiarth Esgob Farm	II*
24837	Range including cowhouse, stables, coach house, smithy and poultry house at Llwydiarth Esgob Farm	II*
24838	Range including pigsties, laundry, slaughter house, cartsheds and coalshed at Llwydiarth Esgob Farm	II*
24839	Hammels at Llwydiarth Esgob Farm	II*

24840	Agricultural range at Rectory	II
24963	Fferam-gyd	II
24970	Lychgate to Church of St Mary	II
24971	Brynkir	II
24972	The Old Rectory	II
24973	Cottage, Bachau	II
24974	Ty Hen Newydd	II
24975	Agricultural range at Ty Hen Newydd Boiling house and wall of former pigsty range at Ty	II
24976	Hen Newydd	II
25164	Y Stryd	II
25165	Ty Newydd	II
25166	Pant-y-cryntach	II
25167	War Memorial	II
25168	Crown Terrace	II
25169	Crown Terrace	II
25171	Bryn Ddu	II
25172	Lychgate at Church of St Mary	II
25174	Llanddygfael-groes	II
25175	Twll-y-clawdd	II
25176	Cottage at Pant-y-Gist	II
25177	Hen Bont	II
25852	Ysgol Syr Thomas Jones	II*
26138	Tyddyn Traian	II
26649	Nant Uchaf	II
26723	Garage/coach house range at Plas Tregayan	II
26724	Barn at Plas Tregayan	II
26725	Stable range at Plas Tregayan	II
26726	Gatepiers at Upper Lodge entrance to Plas Tregayan	II
26727	Bridge at Plas Tregayan	II
26731	Gatepiers at Lower Lodge entrance to Plas Tregayan	II
26732	Gatepiers at Upper Lodge driveway to Plas Tregayan	II
26733	Gatepiers to main driveway to Plas Tregayan	II
26734	Gatepiers to church path at Plas Tregayan	II
26735	Telephone Call-box	II
87470	Ty Gwyn	II



Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

CHRISTIAN BRANCH B.Sc., P.G. Dip
Pennaeth Gwasanaeth Dros Dro – Rheoleiddio a
Datblygu Economaidd
Interim Head of Service - Regulation and Economic
Development

CYNGOR SIR YNYS MÔN
ISLE OF ANGLESEY COUNTY COUNCIL
Canolfan Fusnes Môn • Anglesey Business Centre
Parc Busnes Bryn Cefni • Bryn Cefni Business Park
LLANGEFNI
Ynys Môn • Isle of Anglesey
LL77 7XA

Gofynnwch am / Please ask for: PMO
E-bost / Email: PMO@ynysmon.llyw.cymru
Ein Cyf / Our Ref:
Eich Cyf / Your Ref:

Dyddiad / Date: 11th December 2023

Dear Sir / Madam,

Town and Country Planning Act 1990
The Developments of National Significance (Procedure) (Wales) Order 2016 (As Amended)
Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017

Project Name: Maen Hir Solar and Energy Storage Project

Proposed Development: Construction, operation and maintenance and decommissioning of a solar photovoltaic (PV) electricity generating station with a capacity exceeding 350 MW (megawatts), and associated development including a Battery Energy Storage System (BESS) of up to 360MW and a ~5MW Community solar PV array.

Thank you for requesting the advice of the Isle of Anglesey County Council (the Council) as the relevant Local Planning Authority with regards to the scope of the Environmental Impact Assessment for the proposed Maen Hir Solar and Energy Storage project.

The Council is the Local Host Authority for the project and would be the relevant Local Planning Authority (LPA) for the purposes of discharging planning conditions and monitoring compliance in relation to any DCO consent given by the Secretary of State for the project. The Council would also be the Local Highway Authority for any highway land identified within the project area.

The Council confirms that it has had the opportunity to review the Scoping Report and presents the following comments in relation to the proposed scope of the EIA.

The Council confirms that it is very concerned with the number and scale of solar farm and battery storage proposals on the Island. These concerns include in particular the cumulative effects of both the proposed Maen Hir Solar Farm and the proposed Alaw Mon Solar Farm projects which are similar in both size, nature and location and have the potential to have a significant cumulative effects on the same host communities. The effects include impacts on landscape and visual, traffic and transport, the environment, Welsh language, culture and sense of place, as well as impacts on the Island's tourism and agriculture sectors which are integral to the local economy.

The Council confirms that it has been in dialogue with the applicant in relation to the Maen Hir project from its early design stage and hopes that this engagement will continue as further details in relation to the project, including EIA and supporting assessments, become available for our review and comments. The Council also confirms that it is willing to discuss the comments raised in this response directly with both PINS and the applicant as relevant.

The Council confirms that the following advice does not prejudice the position of the Council in relation to the proposed project, including the advice of the Council upon receipt of further or more detailed information including an Environmental Statement (ES).

The Council notes that the project comprises the construction, operation and maintenance and decommissioning of a solar photovoltaic (PV) electricity generating station with a capacity exceeding 350 MW (megawatts), and associated development including a Battery Energy Storage System (BESS) of up to 360MW and a ~5MW Community solar PV array.

The Scoping Report confirms that a new National Grid 400kV Substation (the National Grid Substation) is to be consented separately by National Grid Electricity Transmission (NGET) and that National Grid has not yet identified the location for this new 400kV Substation. The Council would be grateful of the opportunity to be party to these discussions as the LPA at the earliest.

The Council also notes the confirmation that the grid connection cables to the National Grid Substation will comprise 400kV cables within a trench, up to 2.5m in depth. The alignment and route of the Grid Connection Corridor is under consideration within the Scoping Study Area and will be refined throughout the progression of the Project through PEIR and ES. Again, the Council as the would welcome further engagement around the cable route once further information is available.

The construction phase is anticipated to take place over up to two sequential phases with the final programme being dependent on the detailed layout design and potential environmental constraints on the timing of construction activities, and will be detailed in the ES. The Council would wish to understand the construction programme and associated impacts better once this information is available.

The operational phase of the project is proposed to be 60 years. During the operational phase onsite activities would include routine servicing, maintenance activities and the replacement of equipment as and when required, as well as management of vegetation.

The Council notes the confirmation that in order to maintain flexibility in the design and layout, the project will adopt the Rochdale Envelope approach by specifying parameter ranges which will be defined in the Project Description chapter of the ES. The Council welcomes the confirmation that the parameters will be considered in detail by technical authors in the ES to ensure the realistic worst-case effects of the project are assessed for each potential receptor.

Accordingly, a final build plan would be submitted to the LPA as part of the DCO requirements. The Council confirms that the final build plan would need to demonstrate how the final 'as-built' design remains within the parameters of any consent given for the development.

1. Council's overall position in relation to low carbon development

The Council has a strong commitment and a track record of promoting, supporting and facilitating progress in the low carbon energy sector through its Energy Island Programme (EIP)¹.

The Anglesey EIP has been in place for a period in excess of 10 years. It was established to ensure that Anglesey can be exemplar in the transition to a prosperous and resilient low carbon economy, providing high quality jobs, education and supply chain opportunities, whilst protecting and enhancing the natural environment and enabling the Welsh language and culture to thrive in vibrant communities.'

The Council declared a climate emergency in September 2020, making a commitment to become carbon zero by 2030. The Council formally adopted in March 2022 a 'Towards Net Zero Plan 2022 to 2025'² which outlines its commitment to the climate emergency and how the council intends to transform to become a net zero organisation. Whilst the Plan focuses on reducing the Council's emissions, it also recognises how the Council has an important role in collaborating with other organisations and businesses across the Island by adapting and taking necessary balanced direct and indirect decisions and actions through, amongst other things, the land use planning process.

The Plan makes specific reference to the Energy Island Programme and states how the delivery of the Programme may not directly have an impact on the Council's carbon emissions, but its outcomes should support the Council's efforts in transitioning to a net zero organisation.

The Council notes that the Maen Hir project would assist in realising the overarching vision of its Energy Island Programme in terms of generating low carbon energy and therefore contribute towards the UK's 2050 net zero target as well as helping to meet the Welsh Government's aspirations as outlined in Prosperity for all: A low carbon Wales. It is also recognised that achieving a low carbon pathway for Wales is contributing to the Welsh Government's well-being objectives.

However, the Council has confirmed since its initial engagement with the Maen Hir project, that the Council's support is dependent on confirmation of a sustainable form of development that has minimal impact on the environment and where the local socio-economic benefits and opportunities including community benefits are reflective and appreciative of the scale and impact of the proposal and appropriately secured. This is to align with the vision of the EIP and relevant policies of the Joint Local Development Plan (JLDP).

In its approach to major development, the Council wishes for the mitigation hierarchy to be applied which includes firstly consideration given to the identification of mitigation measures to avoid significant adverse effects and, if it is not possible to avoid significant adverse effects, then measures to reduce these effects should be considered, agreed and suitable secured.

Compensation for effects, offsite enhancement and/or remediation of effects should only be considered if it is not reasonably possible to avoid or reduce significant effects.

The Ynys Mon and Gwynedd Joint Local Development Plan (JLDP)³ provides the Island's land use planning policy framework and confirms the importance of ensuring that, wherever feasible and viable, the plan area realises its potential as a leading area for initiatives based on renewable or low carbon energy technologies. (Strategic Policy PS 7: Renewable Energy Technology, ADN 2: PV Solar Energy, AND 3 Other renewable energy and low carbon

¹ IACC Energy Island Programme Website (Link)

² [Climate change \(gov.wales\)](https://www.gov.wales/climate-change)

³ [Current Joint Local Development Plan \(gov.wales\)](https://www.gov.wales/current-joint-local-development-plan)

technology and PS 13: Providing opportunity for a flourishing economy).

Anglesey, as an Island, undoubtedly has a very unique and special 'Sense of Place'. The Welsh language serves as a golden thread, weaving together history and heritage, it has a strong sense of community spirit and well-being and the land and landscape has served the community over the centuries – which is pivotal in sustaining the agricultural economy and supporting a tourism industry, which is critical to the Island's economic sustainability.

The Council confirms that it expects any developer wishing to develop on the island to fully recognise, support and enhance these unique and special features.

2. Policy Considerations

2.1 National Planning Policy

2.2 Future Wales

On the 24 February 2021 the Future Wales: The National Plan 2040 was published by the Welsh Government, and it forms part of the development plan for an area alongside the Local Development Plan⁴.

Future Wales acknowledges that Wales is abundant in opportunities to generate renewable energy and states that the Welsh Government is committed to maximising this potential. Generating renewable energy is a key part of their commitment to decarbonisation and tackling the climate emergency and refers to the ambitious targets set for the generation of renewable energy.

Policy 17 – 'Renewable and Low Carbon Energy and Associated Infrastructure' gives the positive policy stance from the Welsh Government on renewable and low carbon energy generation and goes on to give the spatial dimension of the policies which apply to National Parks, AONBs and the Pre Assessed Areas. The Policy confirms that proposals should ensure there is no significant unacceptable detrimental impact on the surrounding natural environment and local communities and that the development should describe the net benefits the scheme will bring in terms of social, economic environmental and cultural improvements to local communities.

Policy 18 – 'Renewable and Low Carbon Energy Developments of National Significance' relates to large scale (Development of National Significance (DNS) size) renewable and low carbon developments and provide a framework for decision-making. It is positively framed to making permitting projects the starting point subject to compliance with both Policy 17 and the criteria included within Policy 18.

The criteria set out under Policy 18 states that consideration should be given towards the impact of the proposal on the landscape, nearby communities and individual dwellings, designated sites, biodiversity, built heritage, reflected lights, defence facilities and operations, transport network and the cumulative impact of the proposal. Consideration should also be given towards the sustainable use and management of resources and that there are provisions for decommissioning and restoration.

⁴ [Future Wales: the national plan 2040 | GOV.WALES](https://gov.wales/future-wales-the-national-plan-2040)

2.3 Planning Policy Wales

Welsh Government published Planning Policy Wales Edition 11 (PPW)⁵ in February 2021 which took into account the publication of Future Wales: The National Plan 2040 and the Wellbeing of Future Generations Act which incorporates seven wellbeing goals.

PPW provides the overarching national level planning policy for Wales and is a material consideration alongside Future Wales. It seeks to support the requirement for sustainable development via the planning system whereby the presumption of sustainable development forms the overarching role together with a firm view on improving population wellbeing.

PPW sets out the specific planning policies for achieving sustainable development across Wales. Figure 4 sets out the key planning principles of this national policy, stating that “The planning system has a vital role to play in making development resilient to climate change, decarbonising society and developing a circular economy for the benefit of both the built and natural environments and to contribute to the achievement of the well-being goals.”

Chapter 5 (Productive and Enterprising Places) sets out Welsh Government’s policies regarding Enterprising Placemaking and Wellbeing across Wales. One of the key aims in relation to energy is:

- *For Wales to generate 70% of its electricity consumption from renewable generation by 2030; 9*
- *For 1 Gigawatt of renewable electricity capacity in Wales to be locally owned by 2030; and;*
- *Actively managing the transition to a low carbon economy.*

Paragraph 5.7.6 identifies how “The planning system should secure an appropriate mix of energy provision, which maximises benefits to our economy and communities whilst minimising potential environmental and social impacts. This forms part of the Welsh Government’s aim to secure the strongest economic development policies, to underpin growth and prosperity in Wales, recognising the importance of decarbonisation and the sustainable use of natural resources, both as an economic driver and a commitment to sustainable development”.

Paragraph 5.9.19 states that: “In determining applications for the range of renewable and low carbon energy technologies, planning authorities should take into account:

- *the contribution a proposal will make to meeting identified Welsh, UK and European targets;*
- *the contribution to cutting greenhouse gas emissions; and*
- *the wider environmental, social and economic benefits and opportunities from renewable and low carbon energy development”*

Paragraph 5.9.20 states: Planning authorities should also identify and require suitable ways to avoid, mitigate or compensate adverse impacts of renewable and low carbon energy development. The construction, operation, decommissioning, remediation and aftercare of proposals should take into account:

- *the need to minimise impacts on local communities, such as from noise and air pollution, to safeguard quality of life for existing and future generations;*
- *the impact on the natural and historic environment;*
- *cumulative impact;*
- *the capacity of, and effects on the transportation network;*

⁵ [Planning policy Wales | GOV.WALES](https://gov.wales/planning-policy-wales)

- *grid connection issues where renewable (electricity) energy developments are proposed; and*
- *the impacts of climate change on the location, design, build and operation of renewable and low carbon energy development”.*

Chapter 5 also outlines that before an application is submitted “...developments should, wherever possible, consider how to avoid, or otherwise minimise, adverse impacts through careful consideration of location, scale, design and other measures”.

It encourages developers to take an active role in engaging with the local community on renewable energy proposals. This should include pre-application discussion and provision of background information on the renewable energy technology that is proposed.

PPW confirms Welsh Government’s expectation for all new renewable energy projects in Wales to include at least an element of local ownership, to retain wealth and provide real benefit to communities. Locally owned generation provides a strong opportunity to retain economic value, contributing to prosperity.

The Wellbeing and Future Generations (Wales) Act 2015 places a well-being duty on public bodies to carry out sustainable development. In the Act, “sustainable development” means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle aimed at achieving the wellbeing goals.

The Council requests that the application demonstrates clearly how the proposed development meets the wellbeing goals as defined by the Act in order to demonstrate that it is a sustainable form of development.

2.4 Local Planning Policy

The Ynys Môn and Gwynedd JLDP is the current local development plan for both Ynys Môn and Gwynedd, adopted on the 31st July 2017. It has recently been decided that separate Local Development Plans will be prepared for Ynys Môn and Gwynedd County Councils. The Council is currently at the early stages of Plan preparation.

The Council confirms that all the parcels of land that forms part of the application area lies outside any development boundaries in the JLDP and none of the sites areas are allocated for a specific use in the JLDP. The sites areas lie in the open countryside outside the Ynys Môn AONB.

The key policies for a solar farm application within the JLDP are Strategic Policy PS 7 ‘Renewable Energy Technology’, Policy ADN 2 ‘PV Solar Energy’ and ADN 3 (Other Renewable Energy and Low Carbon Technologies).

Strategic Policy PS 7 promotes renewable energy technologies provided that they comply with the criteria within the Policy. For this specific proposal regard should be given towards criteria (5) of this Policy;

‘Supporting installations outside designated areas provided that the installation would not cause significant demonstrable harm to landscape character, biodiversity, or amenity of residential or holiday accommodation, either individually or cumulatively’.

Policy ADN 2 states that applications for Solar PV Farms of 5MW or more should be directed to the potential search areas shown on the proposals map. Proposals on this scale will only be permitted in other locations in exceptional circumstances when the need for the scheme can be justified and there are specific locational circumstances. In addition to this requirement

proposals should satisfy the criteria within the Policy.

As part of the evidence base for the JLDP the Council had to undertake a study over the potential of allocating areas of opportunity for renewable energy schemes or other low carbon technologies. This was in response to the letter dated the 10 December 2015 by the Minister for Natural Resources in light of an update to the 'Practice Guidance: Planning for Renewable and Low Carbon Energy – A toolkit for Planners' (Sept 2015).

Initial work which used a site threshold of 0.5MW or more identified 36 potential sites within the Plan area a revised threshold size of 5MW or more (which is the size used in the toolkit) meant that 11 sites were identified and these appear within Table 11 in the Explanation text to Policy ADN 2 as potential opportunity areas. These areas are not allocations but rather areas where such proposals should be directed to.

The Council confirms that none of the site areas are included within the identified potential opportunity areas and therefore in accordance with the requirements of policy AND 2, such a proposal should only be permitted at such locations in exceptional circumstances where the need for the scheme can be justified and there are specific locational circumstances.

In terms of the need for the scheme, as clarified by Lesley Griffiths (Cabinet Secretary for Environment and Rural Affairs) in a letter dated 7th August 2017: "The issue of demonstrating need for renewable energy has never been highlighted as a material consideration in the planning process and the over-riding imperatives to produce more renewable energy to reduce the impact of climate change and meet our decarbonisation targets are crucial in this regard."

The need for the proposal in terms of Policy ADN 2 refers to the requirement to justify an alternative location to the potential opportunity areas identified in the Plan rather than questioning the specific need for additional solar PV farms.

In light of the above, a formal submission will need to be supported with justification over the need for the scheme outlining why the potential opportunity areas identified in the JLDP were not considered by the applicant and/or issues affecting the implementation of these opportunity areas. In addition, such justification should also outline the specific locational circumstances that led to the identification of the specific parcels of land subject to the application based upon a site selection process. The Council recommends that this information is provided within a Site Selection Report.

Policy ADN 2 also confirms the need for any form of wind or solar development to conform with the following criteria;

1. *All impacts on landscape character, heritage assets and natural resources have been adequately mitigated, ensuring that the special qualities of all locally, nationally and internationally important landscape, biodiversity and heritage designations, including, where appropriate, their settings are conserved or enhanced;*
2. *The proposal will not result in significant harm to the safety or amenity of sensitive receptors including effect from glint and glare and will not have an unacceptable impact on roads, rail or aviation safety;*
3. *The proposal will not result in significant harm to the residential visual amenities of nearby residents;*
4. *The proposal will not have unacceptable cumulative impacts in relation to existing solar PV farms and those which have permission and other prominent landscape features.*

Policy ADN 3 (Other Renewable Energy and Low Carbon Technologies) of the JLDP is also relevant to the Battery Energy Storage aspect of the development. The policy states that proposals for renewable and low carbon energy technologies, other than wind or solar, which contribute a low carbon future will be permitted, provided that the proposal conforms with the

specific criteria identified under the policy.

Included in Appendix 1 is a full list of all the relevant policies included in the Joint LDP that are relevant and require consideration as part of any application. The policy considerations are also dealt with below in relation to specific topic areas.

2.5 North Anglesey Economic Regeneration Plan

The Council has prepared a North Anglesey Economic Regeneration Plan in order to identify a programme of action to address the needs of North Anglesey.

The Plan responds to the economic challenges faced by North Anglesey due to lack of employment opportunities as business decide to close or relocate, the decommissioning of the Wylfa Power Station and the withdrawal of Horizons Wylfa Newydd New Nuclear Project.

The Vision for the plan is by 2026 for the North Anglesey to have developed improved employment opportunities and supporting infrastructure that make the most of its natural, historic and built environment, complements the area's character and promotes wellbeing, community cohesion, Welsh language and quality of life. The area will be an attractive place to live, work and visit.

The Regeneration Plan does not sit in isolation. It reflects, and is informed by, several plans and policies at the national and local level (see section 5 of the Plan).

The Council will be seeking confirmation of how the proposal aligns with the vision and actions identified within the North Anglesey Regeneration Plan.

2.6 Proposed development on former shell site, Rhosgoch

The Council notes the confirmation in the Scoping Report that the proposed development includes developing the former Shell site at Rhosgoch – this includes the Maen Hir North site. The site could be developed to host a temporary strategic hub for construction logistics and a 5MW community solar and Battery Energy Storage System. The Council also notes the confirmation that these developments could involve infrastructure investment that could help unlock the future development on the site to support planned employment and energy uses.

The Council confirms that the former Shell site is a reserved employment site within the JLDP, safeguarded for employment use (B1, B2 and B8 uses) under policy CYF 1 of the Plan (C(wg)39 map reference).

Within the JLDP the former site of Shell, Rhosgoch is a reserved employment site not for local market demand for general industrial or business uses, but rather to accommodate business and employment uses that would initially cater specifically for the needs of Wylfa Newydd or other 'Energy Island'/ 'Enterprise Island' development. Proposals for B1, B2 or B8 uses on these sites would need to demonstrate that there was no suitable safeguarded or allocated employment site or the supply is insufficient to meet the need.

The Plan confirms that these sites have an important role in maintaining and securing future employment opportunities, and therefore the intention is to protect them for those purposes. Any proposals on these safeguarded sites need to comply fully with Policy CYF 1 of the JLDP.

Policy CYF 5 of the JLDP provides for alternative uses of existing employment sites and confirms;

Proposals to release land on existing employment sites safeguarded for Use Classes B1, B2 or B8 in accordance with Policy CYF1 for alternative uses will be granted only in special

circumstances, provided they conform to one or more of the following criteria:

1. *If the site is vacant, that it is unlikely to be used in the short and medium term for the original use or the safeguarded use and there isn't a viable business or industrial use for the site, or*
2. *There is an over provision of employment sites within the vicinity, or*
3. *The current employment use is having a detrimental effect on amenity and the environment, or*
4. *The proposal would not have a detrimental effect on employment uses at adjacent sites, or*
5. *There is no other suitable alternative site for the proposed use, or*
6. *If the site is used in the short term (on a temporary basis) it should be assured that there are appropriate restoration measures in place to the satisfaction of the Local Planning Authority.*

The explanatory text for Policy CYF 5 confirms that 'the Plan seeks to ensure that there is adequate and appropriate provision of land for employment purposes. It is essential that these sites are retained as far as appropriate as they are located in areas close to where people live in order to reduce the need to travel to work and to support economic growth and the local economy. As such the loss of employment uses can negatively impact on access to local jobs and reduce the area's competitiveness'.

However the text also confirms that 'over time, there may be cases where some traditional employment sites or premises may become dormant. Furthermore it is recognised that traditional employment uses do not tend to produce land values that compare with uses such as housing or retail'.

The Council confirms that it is willing to continue to engage with the applicant with regards to potential development on the former Shell site, Rhosgoch to ensure alignment between the proposals and the JLDP.

2.7 Anglesey Freeport

The Anglesey Freeport is a collaboration between the Council and Stena Line and will play a central role in providing enhanced economic development and growth incentives on the Island to improve prosperity (as well as across the wider North Wales region). If designated, the Council will be the accountable body for the Anglesey Freeport.

Freeports are a partnership between active ports and their host local authorities. They include the designation of specific sites where businesses receive certain tax benefits (e.g. relief from Land Transaction Tax, Business Rates and employers' National Insurance Contributions as well as enhanced capital and buildings and structures allowances).

The Welsh Freeport programme has three main objectives:

- *Promote regeneration and high-quality job creation*
- *Establish the Freeport as a national hub for global trade and investment*
- *Foster an innovative environment*

There is also additional focus on Fair Work, Net Zero and the Welsh Language.

The Anglesey Freeport bid had two main themes:

- *increasing the volume of trade through the port (and restoring the "Land Bridge" between Ireland and mainland Europe)*
- *attracting investment into key sites, in particular from the low carbon energy sector,*

aligning with the Energy Island Programme

As part of the Anglesey Freeport, Tax and Custom sites on the Island have been identified (it is noted that the Freeport Guidance allows for the boundaries of the Tax & Custom sites to be varied between bid stage and agreement of the Outline Business Case (OBC). Tax Site Strategies are being prepared for each of the three sites.

The Council confirms that the former Shell site, Rhosgoch is identified as a proposed tax site and that any proposals on the site would need to align with the vision of the Anglesey Freeport.

Continued engagement between the applicant and the Council will be necessary in relation to the proposed development at the former Shell site, Rhosgoch in order to ensure alignment with the Freeport's vision and priorities.

3. Landscape and Visual

Policy 18 of Future Wales confirms that renewable and low carbon Energy development qualifying as DNS will be permitted provided that they meet the listed criteria set out under the Policy. Criteria 1 and 2 confirms that;

1. *outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty);*
2. *there are no unacceptable adverse visual impacts on nearby communities and individual dwellings;*

In addition the Policy confirms that the cumulative impacts of existing and consented renewable Energy schemes should also be considered.

Consideration is also required to the provisions included within policy ADN2 and AND3 of the adopted Ynys Mon and Gwynedd Joint Local Development plan (JLDP) which have already been referred to in Section 2 of this response.

Section 7.2 of the EIA Scoping Report sets out the approach to the assessment of Landscape and Visual impacts.

3.1 Methodology

The Council considers that the presentation of the proposed methodology for landscape and visual assessment is confusing for the reader. In line with para 2.22 and Summary Advice under 2.26 of the Guidelines for Landscape and Visual Impact Assessment (GLVIA) 'LVIA must deal with and clearly distinguish between the assessment of landscape effects, dealing with changes to the landscape as a resource, and the assessment of visual effects, dealing with changes in views and visual amenity.'

The criteria presented for the visual assessment and for the landscape assessment are not presented separately.

- *Table 7-7 presents susceptibility criteria for both landscape and visual receptors;*
- *Table 7-8 presents value criteria for landscape receptors only;*
- *There are no value criteria for visual receptors;*
- *Tables 7-11 to 7-13 present magnitude of change criteria for both landscape and visual changes together; and*
- *Table 7-12 presents duration of change criteria. This could helpfully be aligned with the project's construction phase and the assessment design year for operational mitigation,*

stated at paragraph 7.2.93 to be 15 years. This would help with the narrative around operation effects at paragraph 7.2.107.

There is no comprehensive explanation of what the defined Scoping Study Area is. It is only referenced in the text of the Ecology chapter but is shown on the figures across many chapters. To avoid confusion, the Scoping Study Area should be clearly defined, and should be consistent with that described in relevant supporting figures within the Scoping Report.

To avoid any potential omission or double counting in the assessments, the applicant should clarify the division of scope and the methodological relationships at the interface between the LVIA and the Cultural Heritage chapter. This should cover how and where the heritage aspect of the landscape character and designated sites are considered.

It should also clarify how effects on the significance and visual setting of designated and non-designated heritage assets (Figure 7-17), such as listed buildings and scheduled monuments, will be addressed. This is unclear in the information submitted in support of the Scoping Request.

3.2 Landscape Receptors

The level of detail and granularity proposed for the landscape assessment seems appropriate based on an understanding of the scale and extent of the development proposals.

It is unclear why designated landscape receptors are included under Visual Amenity in 7.2.48 and under Visual Effects at Table 7-14. Whilst visual receptors may lie within these designated landscapes it is common practice to present and assess designated landscapes as landscape receptors.

As referenced above, GLVIA paragraphs 2.22 and 2.26 confirm that landscape and visual effects should be assessed and presented separately.

The applicant should provide further clarity on how designated landscape receptors will be assessed in the LVIA.

3.3 Assumptions and limitations

Assumptions and limitations are inherent in landscape and visual assessment work. Therefore, it is important to explain what parameters and assumptions have been taken into consideration in scoping the LVIA, as well as the limitations of the information available to date.

The Scoping Request content is relatively high-level in respect of the scope of the LVIA. It does address some limitations throughout the body of the text, (e.g. paragraph 7.2.38 where it is stated that the ZTV may change with design development). However, Section 7 does not clearly cover overarching limitations and assumptions.

In the Preliminary Environmental Information Report (PEIR), reference is made to Scoping Request paragraph 6.6.6, wherein it is suggested that the applicant will describe any assumptions and limitations applied to the assessments but this is not evidenced to the level which might be expected.

3.4 Selection of Viewpoints

There is a lack of clarity regarding the distinction between the purpose of 'Visual Receptor Groups' and the rationale for using 'Representative Viewpoints'.

It is recognised that it is not practical or proportionate to visit, photograph and visualise every location from which the Project will be visible. However, all visual receptors seem to be covered by only twenty representative viewpoints listed in Table 7-5 and shown on Figures 7-12 and 7-13. These representative viewpoints do not appear to include the viewpoints that will be included in the RVAA and the ARA. Many of the visual receptors listed in paragraphs 7.2.120 to 7.2.122 cannot realistically (based on our current understanding) be represented by the viewpoints selected.

Twenty representative viewpoints are not considered proportionate to the Project's size, scale and geographical spread across the three parcels spanning some 12km north to south.

It should be noted that other much smaller solar farm proposals currently proposed or consented on Anglesey, typically use around twenty representative viewpoints. Each one of Maen Hir's proposed parcels broadly equate to the whole development size of the Alaw Mon or Parc Solar Traffwll developments for example. The Council requests that further consideration is given to the range of viewpoints that will be available to inform the assessment.

The LVIA should include assessments for all visual receptors including residential and recreational receptors with the potential to be significantly affected by the proposed development. Receptors can be grouped and represented by a single viewpoint where appropriate. The selection of viewpoints selected to represent these receptors should be proportionate and genuinely representative. The Council would anticipate gaining access to the applicant's assessment of visual receptors and representative viewpoints when this information becomes available.

The following list of additional viewpoints below is not exhaustive but is a list of one or two example visual receptors per parcel identified using the approach of high sensitivity and magnitude factors, which is considered to represent a more proportionate selection of visual receptors. Whilst some of these receptors are listed in paragraphs 7.2.120 to 7.2.122, they are not mapped and so it is difficult to see whether the scope includes the appropriate receptors for assessment.

1. *PRoW Footpath MECHELL 38/077/2 at the point where it connects to the Circular Way Long distance footpath adjacent to an unclassified road. Northwest of Northern parcel. Receptors: Walkers, Motorists, and Residents.*
2. *South of PRoW Footpath RHOSYBOL 44/028/2. Centre of Northern parcel. Receptors: Walkers.*
3. *Point along PRoW Footpath MECHELL 38/067/2. South of northern parcel. Receptors: Walkers.*
4. *South of PRoW Footpath TREF ALAW 47/021/1 at the point where it connects to an unclassified road. North of central parcel. Receptors: Walkers, Motorists, and Residents.*
5. *PRoW Footpath RHOSYBOL 44/027/1 at the point where it connects to an unclassified road. Northeast of central parcel. Receptors: Walkers and Motorists.*
6. *Point along PRoW Footpath LLANNERCH-Y-MEDD 25/003/. South of central parcel. Receptors: Walkers.*
7. *South of PRoW Footpath RHOSYBOL 44/036/1 at the point where it connects to the National Cycle Network Route 5. North of southern parcel. Receptors: Cyclists, Walkers, and Motorists.*

8. *B5111 highway near the south of PRow Footpath LLANNERCH-Y-MEDD 25/013/1. East of southern parcel. Receptors: Motorists and Residents.*
9. *Point along the National Cycle Network Route 5. West of southern parcel. Receptors: Cyclists, Motorists, and Residents.*

3.5 Combined Visual Effects

The assessment should distinguish between the key different types of combined visual effects. It is appreciated that, as stated at 7.2.124, the low-lying and compartmentalised nature of the proposed development and the prevailing landform may limit the number of locations from which it is possible to concurrently see more than one development parcel. Such viewpoints do include the elevated viewpoints highlighted in the paragraph.

However, the assessment should also include receptors which it can be predicted may be able to see parts of the development in sequence during a journey. NCR 5 is likely to have views of both the south and central parcel. There are likely to be a number of recreational routes with views of more than one parcel along a journey.

In terms of photomontages, a proportionate approach to visualising the project and potential impacts is necessary to inform the assessment and assist the reader. It is considered insufficient that only five photomontages are proposed to visualise this project across three large land parcels. It is deemed proportionate to provide several visualisations for each development parcel from a range of directions and distances. The selection of photomontage viewpoints should cover a range of receptor types and some that are likely to experience significant visual effects as well as others that may not. The applicant should agree a wider selection of photomontages or provide adequate justification as to why only five photomontages are proposed. This is absent at present.

3.6 Nighttime Effects and Lighting

It is clear and considered reasonable (based on information provided) that a separate Lighting Impact Assessment (LIA) has been scoped out of the LVIA chapter. However, lighting will be proposed as part of the construction and decommissioning phase of the project and as part of the operation phase of the substation and BESS.

The applicant should, therefore, consider the potential effects of lighting on the character of the landscape and on relevant views that will be included in the LVIA. This does not necessitate a separate lighting effects assessment but does require consideration within the assessment of potential effects, leading to the identification of appropriate mitigation proposals to minimise impact on key receptors.

The Council also requests that any DCO includes a requirement requiring the approval of a lighting scheme for the development at construction phase and operational phase (if appropriate).

3.7 Cumulative Effects

There is potential for confusion around the scope of the assessment of cumulative effects. In the titles of Figures 7-12 and 7-13, the word 'cumulative' is used to describe the combination of ZTVs from the different aspects of the Maen Hir Project. In the ES it may be necessary to also show ZTVs combined with those of other cumulative projects. At paragraph 7.2.123, these combined ZTVs are correctly referred to.

The LVIA or in fact the wider Scoping Request, does not make any reference to any other cumulative projects to be scoped in or out for assessment with the Project. As well as this,

there is very limited reference to how cumulative effects may need to take account of ongoing change in the landscape by the time the Project would be initiated.

There are a number of other major development proposals proposed on the Island which include solar farm and BESS projects which are similar in scale, nature and location to the proposed Maen Hir Project.

As a means to highlight a small number of relevant (potentially) cumulative projects that could give rise to a combination of effects, the applicant should refer to the Alaw Mon Solar farm and the Carrog Ganol BESS facility. The applicant should carry out a comprehensive review of both projects and reasonable foreseeable projects and consult the Council on its proposed cumulative project list.

It is important to note for the LVIA cumulative scope, that cumulative projects will not only include projects that are concurrently potentially intervisible with Maen Hir. They may also include other projects that are visible in different directions from a viewpoint or that are visible at different locations in sequence for example, during a journey along NCR5.

3.8 Landscape Visual Conclusion

The Council recommends that the applicant reviews the following information:

- Separately scope and agree the cumulative assessment and share the proposed approach with the Council.
- Revisit the selection of receptors and representative viewpoints in relation to the Project's size and scale.
- Provide a more proportionate selection of photomontages for views from a range of distances and angles to each parcel, which are likely to experience a variety of visual effects.
- Include in the LVIA an assessment of the potential for night-time effects on the landscape and views from construction and operational lighting.
- Review the methodology and (for clarity) consider presenting the landscape and visual assessment criteria separately.
- Include overarching discipline specific assessment assumptions and limitations to assist in bounding the assessment.
- Clarify and scope the interface between landscape and visual with the cultural heritage chapter.

4 Cultural Heritage and Archaeology

Criterion (6) of Policy 18 of Future Wales states that there should be no unacceptable adverse impacts on statutorily protected built heritage assets.

In addition to archaeology, the development may have implications for the setting of designated assets and for historic landscape character. It is therefore advised that Cadw should be consulted on the scope of setting assessment that will be required.

4.1 Archaeology

The Council has consulted with Gwynedd Archaeological Planning Service (GAPS), the regional curator with regulatory and advisory functions and the Council's advisor with regards to matters concerning archaeology.

GAPS have reviewed the relevant sections of the scoping report and confirm that the proposed assessment methodology (research and criteria) appears appropriate.

GAPS are of the opinion that trial trenching will be required following the desk-based assessment and geophysical survey (paragraph 7.4.19 of the report). The scope of trial trenching will be informed by the results of these preceding stages but it is not expected that geophysics will be the sole determinant for trench layout, as the technique has acknowledged limitations and its reliability is variable with geology and ground conditions. As noted in the scoping report, GAPS have already approved a Written Scheme of Investigation for the desk-based assessment from Cotswold Archaeology and have commenced discussions on the scope and format of setting assessment and field evaluation. These discussions and aspects are expected to progress next year.

GAPS agrees with the elements to be scoped in/out of assessment as set out in paragraphs 7.4.41 and 7.4.42. However, GAPS disagree with the starting premise that significant effects on the historic environment are unlikely – this appears to be prejudging the outcome of the assessment and evaluation yet to be undertaken. Whilst it is true that this type and scale of development offers various options for avoiding, minimising or offsetting impacts, the evidence is not yet available to reach a conclusion on the significance of these impacts. It is not yet possible to rule out a conflict between scheme design and as-yet unknown archaeology of high sensitivity, which could not be reduced to a less than significant impact in EIA terms.

The results of the assessments and staged evaluation should be presented as stand-alone technical reports suitable for accessioning to the regional Historic Environment Record (HER). These should be supplied as appendices to the Environmental Statement, with the results summarised in the relevant chapter as the evidence base for impact assessment. GAPS would expect to receive drafts of the reports before EIA submission for technical review and for expediency in progressing through the stages of assessment and the consenting process. GAPS have already discussed provisional reporting format with Cotswold Archaeology and the HER officer, having regard to the size and separate locations of the proposed development areas.

All stages of work must be undertaken by a professional archaeological firm experienced in the relevant technique and in accordance with the standards and guidance of the Chartered Institute for Archaeologists. The proposed scope and methodology of each stage will need to be agreed with GAPS in advance.

4.2 Listed Buildings

Section 7.4 of the EIA Scoping Report sets out the approach to the assessment of impact on Cultural Heritage.

Figure 7-17 Designated Heritage Assets – The Map Key refers to Conservation Areas. However, the Amlwch Central, Amlwch Port (which appears to be just beyond the Heritage Study Area) and Llanfechell Conservation Areas do not appear to have been plotted on the map..

The Welsh Government/Cadw's publication 'Setting of Historic Assets in Wales 2017' states:

- *Setting is important to the way in which historic assets are understood, appreciated and experienced, and contributes to their significance.*
- *Setting often extends beyond the property boundary of an individual historic asset into a broader landscape context. Intangible as well as physical factors can be important to understanding the setting of a historic asset. These may include function, sensory perceptions or historical, artistic, literary and scenic associations.*
- *National planning policy encourages local planning authorities to take the settings of historic assets into account when preparing development plans and when determining planning applications.*

- *When change or development is proposed, it is important to identify the historic assets that might be affected, define their setting and understand how that setting contributes to the significance of the historic assets.*
- *If a proposed change or development is likely to have an impact on a historic asset and its setting, the applicant should prepare a proportionate and objective written assessment of that impact to inform the decision-making process.*
- *Development proposals should aim to avoid any harmful impact on a historic asset and its setting.*

The importance of a heritage assets' importance lies in what it contributes to the significance of a historic asset. The setting of some types of listed buildings, particularly rural churches and windmills etc, is often of more important than it is to others.

Therefore, in order that views to, from and across these historic assets can be fully assessed the Council advises that visualisations of these types of heritage assets are provided with the assets identified on accompanying maps and photomontages.

5. Agricultural Land Classification

PPW states that the best and most versatile agricultural land (grades 1, 2 and 3a) should be conserved and considerable weight should be given towards protecting such land from development. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development and lower grade land is unavailable. This is reiterated within Policy PS 6 of the JLDP.

The Council notes the confirmation that an Agricultural Land Classification Report is to be prepared in support of the planning application.

The Council refers both the applicant and PEDW to seek the views of the Welsh Government's Land Quality Advice Service in relation to the impact of the proposal on the high quality agricultural land within the proposed development site.

6. Ecology

Section 7.3 of the EIA Scoping Report sets out the approach to the assessment of ecological impact.

Criteria (3) and (4) of Policy 18 of Future Wales confirms that proposals need to ensure no unacceptable impact on the integrity of internationally designated sites and the features for which they are designated and that there is no unacceptable adverse impact on national statutory designated sites for nature conservation, protected habitats and species. Criterion (5) confirms that proposals should include biodiversity enhancement measures to provide a net benefit for biodiversity.

The Council confirms that it is satisfied with the proposal outlined in Section 7.3 of the Scoping Report where relevant to the interests of the Council with regards to assessing the potential impacts of the proposal on the ecological receptors identified.

The Council confirms that it is deferring to the NRW and RSPB (where applicable) in relation to matters concerning European Protected Species, birds and protected sites as well as the Habitats Directive,

The Council will be seeking for the application to demonstrate that it has sought to contribute to the protection and enhancement of the environment and avoid irreversible harmful effects on the natural environment through the proposed design and embedded mitigation measures applied to the development.

The scoping has no details of biodiversity enhancement measures being proposed. The Council is eager to discuss potential enhancement measures which would be integrated within the development at the earliest convenience with the developer.

It is noted that nighttime lighting will be avoided. Should any lighting be required for construction or operational phase, the Council requests that a lighting scheme is submitted for approval under a requirement attached to any DCO consent. All external lighting will need to follow Bats and Artificial Lighting at Night (BCT) and dark skies lighting guidance.

The Council is satisfied with the ecological and protected species surveys that have been carried out on site. However it is advised that there is a need to ensure that the surveys that are used to inform the EIA and mitigation proposals remain current and within date. Some of the surveys referred to have been carried out within the period 2021/22.

It is recommended that a Arboriculturally Report is conducted to assess all of the trees and hedgerows on site. This should also outline all of the Root Protected Areas and confirm any vegetation that is proposed to be removed.

It is noted that a Construction Environmental Management Plan (CEMP) will be submitted as part of the application. The CEMP should include reference to pollution prevention guidelines.

In addition a Landscape Ecological Management Plan (LEMP) should be submitted as part of the application. The LEMP should include management measures for newly created and current biodiversity enhancement areas.

Buffer zones around all areas identified that require mitigation and protection will need to be noted on the proposed plans. Further details and specifications for that are needed from what is currently outlined/mentioned within the plans.

7. Traffic and Transport

Section 7.5 of the EIA Scoping Report sets out the approach to the assessment of Traffic and Transport Impacts.

The Council is supportive of the approach to the assessment with reference to the identified access routes and the undertaking of baseline surveys.

With respect to the identified routes and proposed Automatic Traffic Counts (ATC) sites, the following comments are made:

- With regards to Route 1, and with reference to the distance between ATC location 3 and 5, consideration should be given to an additional ATC site on the A5025 in Llanfaethlu.
- On Route 2 it would be beneficial to have an additional ATC survey point between Trefor and Carmel on the B5112.
- The Authority is aware of existing community concerns in respect of usage by HGVs on a section of the A5 which coincides with Route 5. An additional ATC site should be considered on this route (A5 Gwalchmai). The continuation of Route 5 proceeds from the A5 towards Bodffordd where similar community concerns have been raised in respect to HGVs. An ATC should be considered on this section of the highway network.

It is considered that no further ATC locations are required on the secondary routes from the consolidation hub.

The Council is supportive of the Assessment Methodology based on the Environmental Assessment of Traffic and Movement (EATM) Guidance.

With consideration to the proposed location of the consolidation hub and associated high volumes of traffic accessing and exiting this site, particular attention should be given in the

EIA to this, especially the section between the A5025 to Rhosgoch, with reference to the transport and access assessment topics in the EATM guidance.

Consideration in the EIA should be given to the inclusion of reported local traffic movement and safety concerns which may not necessarily be identified when following the methodology contained in the Environmental Assessment of Traffic and Movement (EATM) Guidance due to factors such as low volumes.

The Council notes the confirmation that the application will be accompanied by a standalone Transport Statement and Outline Construction Traffic Management Plan (CTMP). At this stage the Council cannot confirm that a Transport Statement will be sufficient and that there is no need for a Transport Assessment to fully assess the potential impacts of the proposed development on Transport and Access.

The Council expects the ES to be based on a sound understanding of the existing baseline conditions in order to ensure that potential impacts of the project on transport and access are appropriately identified and subsequently appropriate mitigation identified and secured in the form of management proposals.

The confirmation that an Outline Construction Traffic Management Plan (CTMP) is to be prepared to support the planning application is welcomed and the Authority would also welcome the opportunity to scope the detail of the CTMP with the applicant.

The Council requires confirmation if the development will affect any national cycle network routes or public rights of way. If it is confirmed that there will be any impact on these receptors the Council would wish to discuss this further with the applicant in order to minimise impact through securing appropriate mitigation.

8. Public Protection

The Council is satisfied with the proposal set out in Chapters 7.6, 7.8, 7.14 of the applicants Scoping Report with regards to assessing the potential effects of the proposed development with respect to Air Quality, Ground Quality and Health.

The Council is satisfied with the majority of the proposals set out in Chapter 7.7 of the applicants Scoping Report with regards to assessing the potential effects of the proposed development with respect to Noise.

However, it is noted there is no mention of the proposed Alaw Mon solar farm and battery storage development which could have a cumulative impact upon the area if both developments align in terms of the construction phase.

The Alaw Mon proposal is progressed by Enso Energy and is currently holding a statutory publicity and consultation Pre-Application Consultation (PAC) for the project. Further information including draft application documentation can be found on the project website⁶

Whilst outside the scope of the ES, the Council has the following advisory comments for the applicant relating to impact noise from pile driving the solar PV array supports.

The Council would recommend that the applicant formalise working hours and specific noise and vibration limits through the adoption of the Control of Pollution Act 1974 Section 61 – ‘Prior Consent for Work on Construction Sites’ process as part of the mitigation measures for this redevelopment. Further advice can be obtained from the Public Protection department via EHEALTH@ynysmon.llyw.cymru.

⁶ [Home | Alaw Mon Solar Farm \(alaw-mon-solar-farm.co.uk\)](http://alaw-mon-solar-farm.co.uk)

The Council requests further details on how impact noise from the metal-on-metal hammer driven piling operations shall be mitigated.

Percussive noise will arise from the operations to install every ground mounted pile for the solar PV arrays. It would be anticipated that the number of ground mounted piles required for this 350MW development would be in the thousands.

Therefore, the Council requires a written statement on how it is intend to install the ground mounted piles, the proposed mitigation measures and what is perceived as best practicable means within the construction industry.

With specific reference to any pile driving operations in close audible proximity to any residential receptor, the Public Protection department would advise as follows:-

It is highly recommended that the applicant undertake an external and internal pre-condition survey of all residential properties that will be in close proximity to any piling / rock breaking / pecking / demolition activities to check for any pre-existing cracks and structural damage. This would not only protect the developer from any future legal claims of damage etc., but it would also provide the residents with some degree of comfort that any issues relating to the properties as a direct result of the developers activities could be addressed in a reasonable and proportionate manner.

The rationale for suggesting this approach, is that metal-on-metal percussive hammer pile driving is highly likely to create a Statutory Nuisance (Section 79(1)(g) of the Environmental Protection Act 1990). This could be mitigated against by using best practicable means. However, some instances may take the development within close audible proximity to residential properties due to the remote location of the development. Therefore, close liaison, monitoring and public consultation with any affected properties would be expected in a large-scale development such as this.

In addition, it is recommended that the construction works be carried out in accordance with CIRIA Document – C741,2015– Environmental Good Practice on site (4th edition).

Furthermore, where it is necessary to prepare the site using pneumatic rock machinery, the developer will be required to take all reasonable steps to prevent nuisance being caused to current occupiers of surround residences from noise vibration and dust. Surrounding residents should be pre-notified of any noisy work and the likely duration of the works. Suitable and sufficient controls should be in place to control wind-blown dust arising from rock stock piles.

8.1 Waste Management

The Council will require the Outline CEMP to include a Site Waste Management Plan. The Plan should detail proposals to minimize and manage waste during all phases of the project.

8.2 Working hours

The Council will require the outline CEMP to confirm that construction activities and deliveries will be carried out Monday to Friday 08:00 – 18:00 and between 08:00 – 13:00 on Saturday. No construction activities or deliveries will occur on Sundays or Public Holidays.

The Council will also require confirmation that where possible, construction deliveries will be coordinated to avoid the traditional AM peak hour (08:00-09:00) and PM peak hour (17:00-18:00) and to avoid school drop off and pick up times (where applicable).

8.3 Fire Safety

The Council recommended early consultation with North Wales Fire Service, in particular with regards to the battery energy storage element of the proposed development.

9. Water Resources and Flood Risk

The Council is satisfied with the proposal set out in Chapters 7.10 of the applicants Scoping Report with regards to assessing the potential effects of the proposed development with respect to Water Resources.

The Council refers both PINS and the applicant to seek the views of Natural Resources Wales (NRW) with regards to matters concerning Flood risk associated with the proposal.

10. Socio-Economic Considerations

10.1 Local Jobs, Skills and Supply Chain opportunities

Future Wales acknowledges that large-scale renewable and low carbon energy schemes can generate direct social and economic benefit to local communities.

The councils 'Energy Island' Programme was established with a vision to create a once- in-a-lifetime opportunity for jobs, economic growth and prosperity through capitalising on a number of transformational projects on Anglesey.

The Growth Vision produced by the North Wales Economic Ambition Board (NWEAB) refers to North Wales as an area positioned to be one of the leading UK locations for energy generation and energy related supply chain investment.

Throughout its pre-application engagement with the developer, the Council has confirmed that it is seeking confirmation and commitment that the local socio-economic benefits arising from all stages of the project will to be maximised and appropriately secured within any consent given for the development. Given the scale of the project, the Council will be looking for meaningful socio-economic benefits including community benefits.

Such Socio-economic benefits should include maximising opportunities for local job, skills and supply chain opportunities during all phases of the project (from construction to decommissioning) and should align with the proximity principle where benefits are focused on those communities hosting the development.

The Council has also confirmed that it is looking for appropriate monitoring mechanisms to be established in order to confirm the actual benefits realised during the project's implementation stages.

The Council requests that the application is supported by an 'Economic Benefits Statement' and Outline 'Supply Chain and Employment Skills Plan'. A final detailed version of the 'Supply Chain and Employment Skills Plan' will need to be agreed with the Council under a suitably worded DCO requirement.

The Economic Benefits Statement should fully identify the economic benefits of the development, giving full regard to the application of the proximity principle.

The Council seeks a commitment by the applicant for a percentage of the workforce during all stages to be from the local area and to include opportunities or upskilling and apprenticeships.

The Council will be seeking for the 'Supply Chain and Employment Skills Plan' to include;

- *Detail the intention to use local labour where commercially viable and available;*
- *Where practically feasible, available and cost competitive, procure goods and services from local contractors, sub-contractors and suppliers to support local employment;*
- *Detail recruitment and training opportunities involved in the development during construction; and*
- *Support interest in the development of skills in the local area*

The Council requests that the Plan is submitted and approved by the Council at least 4 months prior to construction stage. This is to ensure that there is adequate time for the activities included in the Plan to be implemented and actioned upon and for the local opportunities and benefits to be secured and maximized.

The Council also requests that the discussion around local opportunities and benefits continues with the Council and key stakeholders as the planning process goes underway. This is to ensure that the local benefits are realised and maximised.

The Council confirms that a range of key stakeholders needs to be involved in the discussion around promotion of local opportunities and these include (but not limited to) the Welsh Government, North Wales Regional Skills Partnership, Ambition North Wales, M-Sparc, local education providers (Grwp Llandrillo Menai and Bangor University) and the Council's Economic Development Team and Education Service

The Council will be seeking for the application to demonstrate an understanding of the local skills and supply chain available to the project and to commit to ensuring that the project will use a percentage of what is available locally both during construction, operation and decommissioning phase. The roles during operational phase which will last a period of 60 years will include civil engineering, land management, operations and maintenance, all of which are available locally.

The Council expects the conversation around securing local socio-economic opportunities to continue with the Council, in particular as more detail becomes available in relation to the project's requirements in relation to labour and supply chain. This is to ensure full alignment with the vision of the Council's Energy Island Programme.

10.2 Tourism

Tourism is the largest economic sector on the Island with visitors coming to Anglesey to experience its unique character and very special "Sense of Place", peaceful and tranquil setting, its beaches, seascapes and its dramatic landscapes. Its greatest tourism assets lie in its natural and historic environment and its landscape which have been acknowledged and designated nationally and internationally.

The Council has recently adopted an updated Destination Management Plan (DMP) for the period 2023 to 2028 which plans for the future of tourism and the visitor economy on the Island up to 2028. The Plan identifies the strengths, areas of challenge or barriers to overcome and priority project opportunities for the future of tourism and visitor economy on the Island. With rapid changes in the visitor economy it is vital we balance the needs of residents, communities and visitors. But also be mindful of the special qualities on Anglesey and the reason people visit in the first place.

The Council expects the assessment to give full regard to the DMP.

The Council will be seeking for the application to carry out appropriate assessment of the potential impacts arising from all stages of the project on Anglesey's tourism sector. The

Council notes the confirmation in the Scoping Report that visitor attractions in close proximity to the development sites include Parys Mountain, Bull Bay Golf Club, Llyn Alaw Reservoir and Treysgawen Hall.

The Council welcomes the confirmation that the assessment will include assessing the change in demand for temporary workers accommodation including short term let.

This is required to confirm if the project has the potential to impact on the tourism sector and to confirm whether appropriate mitigation measures need to be identified to minimise effects. The Council notes the confirmation that the proposal could have a beneficial impact on the tourism sector through securing improvements to ProWs and tourism trail. The Council would welcome further detail in relation to these potential improvements including confirmation as to how they are secured.

10.3 Welsh language and Culture

Policy PS 5: Sustainable Development of the Joint LDP confirms at criteria 4 that all proposals should 'Protect, support and promote the use of the Welsh language in accordance with Strategic Policy PS 1'.

Strategic Policy PS 1 – Welsh Language and Culture of the same plan provides a framework for considering how development achieves this. The Policy confirms that a Welsh Language Statement or Welsh Language Assessment is required where development falls within the specified categories. This is to ensure that development, where required protects, promotes and enhances the Welsh Language.

A methodology for preparing an Assessment/Statement is contained within the Supplementary Planning Guidance (SPG) Maintaining and Creating Distinctive and Sustainable Communities⁷.

11. Local Involvement and Community Benefits

11.1 The Council's approach

Policy 17 of Future Wales (February 2021) requires applicants to describe the net benefits a proposed development will bring in terms of social, economic, environmental and cultural improvements to local communities.

Paragraph 5.9.24 of Planning Policy Wales states that the Welsh Government supports projects which are developed by wholly Wales based organisations, including community groups or provide proportionate benefit to the host community or Wales as a whole.

In February 2020 the Welsh Government published a policy statement on local ownership of energy developments. This set out the Welsh Government's expectation for all new renewable energy projects in Wales to include at least an element of local ownership, to retain wealth and provide real benefit to communities. Locally owned generation provides a strong opportunity to retain economic value, contributing to prosperity.

Paragraph 5.9.26 confirms that 'experience has shown that there are significant opportunities to achieve local benefits through renewable energy developments. Some benefits can be justified as mitigation of development impacts through the planning process. In addition, developers may offer benefits not directly related to the planning process. Local authorities, where practical, should facilitate and encourage such proposals'.

⁷ [SPG-Maintaining-and-Creating-Distinctive-and-Sustainable-Communities.pdf \(anglesey.gov.uk\)](https://www.anglesey.gov.uk/SPG-Maintaining-and-Creating-Distinctive-and-Sustainable-Communities.pdf)

The Welsh Government's Energy Service can provide support and advice on local involvement in developing renewable energy and benefiting from it.

In order for Anglesey and its communities to fully capitalise upon the anticipated positive impacts of major development, the County Council has prepared a voluntary Community Benefit Contributions Strategy⁸.

The Council confirms that it is committed to ensuring that all communities benefit directly from the use of their local resources and environment by all major projects on Anglesey. The Council expects all major projects to deliver a positive "legacy" for Anglesey, with their development, operation and construction making a positive contribution to the well-being, quality of life and sustainability of the Island and its communities.

Voluntary community benefit contributions provide a legitimate opportunity for major project developers to provide meaningful rewards (be it financial and/or in-kind contributions) in recognition of the burden, disruption and inconvenience being imposed on the communities hosting their developments. The Council as confirmed in the Strategy will be proactive, consistent and transparent in its approach to working with private and public sector partners, and the island's communities, to secure meaningful benefits which address the needs of Anglesey.

The Council acknowledges that it has no powers to compel developers to provide voluntary community benefit contributions; and that they must be seen by developers to be affordable in terms of the overall costs and profits of their projects over their lifecycles. However, there remains a clear and strong expectation from both the Council and the local community for the proposed solar farm to provide a significant and long-term voluntary community benefits to the host community in line with the application of the proximity principle for the lifetime of the project.

The application of the proximity principle ensures that benefits are focused on those communities that host and feel the impact and burden of the development across its lifetime (construction, operation and decommissioning).

11.2 Collaborative Benefit Report

The Welsh Government views a Collaborative Benefit Report as a practical tool to improve transparency throughout the development process and increase the participation of all stakeholders. The Council recommends that a report is prepared to support the planning application.

The Report should detail the engagement journey and include a record of dialogue on local and shared ownership. Welsh Government draft guidance on Local Ownership indicates that the Collaborative Benefits Report should be submitted as evidence of good practice and local support, alongside the main planning application documents. This is in line with the requirement of Planning Policy Wales (PPW) for applications to demonstrate the full benefits of development.

The Report is a useful tool to demonstrate the social, economic, environmental and cultural benefits that the proposed development could and therefore giving the decision maker, consultees and the local community the comfort that the proposed collaborative benefits which are identified are realistic, securable and deliverable and should be weighed in the planning balance. It also provides an overview of the engagement that has taken place (and its outcomes) with local communities to try and identify opportunities for local.

The Council would welcome the opportunity to discuss the community benefits proposal

⁸ [Community Benefit Contributions Strategy \(gov.wales\)](#)

further with the applicant. The Council notes the confirmation that the development includes a 5MW community solar.

For other low carbon energy developments on the island a legacy community benefit fund has been established which is paid into annually for the duration of the operational phase. The Council considers this to be an effective mean of providing meaningful and rewarding form of benefits that can have a positive impact on the well-being, quality of life and sustainability of the host community.

As confirmed above, the Council in its approach to benefits requires the proximity principle to be applied to ensure that those communities that are mostly affected by all phases of the development are the ones who receive meaningful rewards from the developer (be it financial and/or in-kind contributions) in recognition of the burden, disruption and inconvenience being imposed on the communities from hosting their development. The Council therefore expects the community benefit for the proposed development to be provide meaningful reward to the local host community.

The Council strongly recommends that the applicant consults with the relevant Community Councils' with respect to the Collaborative Benefit Report and the benefits identified within at the earliest convenience.

12. Decommissioning

The Council notes that decommissioning is anticipated to take approximately 6 to 12 months and The Site would be reinstated in accordance with a Decommissioning Environmental Management Plan (DEMP) which would need to be approved by the Council under a DCO requirement.

The Council agrees with the applicant that detail in relation to decommissioning is best agreed under condition.

The IACC requires confirmation that appropriate funds will be available to ensure that decommissioning of the development can take place at the end of the 60 year operational period and is carried out in accordance with the agreed scheme.

In this regard, the Councils seeks confirmation that a suitable bond is in place to ensure that sufficient monies will be available to decommission the project in accordance with the decommissioning plan.

The Council also considers it necessary to ensure that if the developer cease to trade, the removal of the development and appropriate restoration works can be achieved.

This approach accords with national planning policy which recognizes that local planning authorities, in addition to a condition, may require a financial guarantee to be put in place.

The Council would be grateful of further engagement with regards to matters concerning decommissioning.

13. Assessment of Cumulative Effects

As part of the ES there will be a need for an appropriate and comprehensive Cumulative Impact Assessment which will need to consider the impacts of the proposed project cumulatively with other operational, consented or reasonable foreseeable projects.

The Council would welcome the opportunity to agree those projects that are to be included in such an Assessment with the applicant.

There are a number of other major development proposals proposed or recently consented on the Island which include solar farm and BESS projects which are similar in scale, nature and location to the proposed Maen Hir Project.

As a means to highlight a small number of relevant (potentially) cumulative projects that could give rise to a combination of effects, the applicant should refer to the Alaw Mon Solar farm project⁹ and the Carrog Ganol BESS facility¹⁰.

The proposed Alaw Mon project is to take place in very close proximity to the proposed development and the Council is concerned with regards to the potential cumulative impacts of both projects. This applies in particular in relation to the following impacts (but not limited to);

- Landscape and Visual
- Traffic and Transport
- Environment
- Welsh language and culture including Sense of Place, tourism and agriculture
- Public Protection including noise, vibration, air quality and lighting impacts

The Council at the earliest convenience would welcome the opportunity to comment on a list of projects that need to be included in the projects Cumulative Impact Assessment.

14. Community Engagement

Should the proposed development be consented the Council requires confirmation that effective and meaningful community engagement will take place throughout the construction period in particular.

This should include the opportunity for the local community impacted by the construction phase to be fully informed as to the construction programme, any road closures, deliveries to site etc. The Council recommends that this takes place through setting up a Community Liaison Group, use of social media/project website as well as a having a Community Liaison Officer in place who is contactable in order to discuss and raise concerns.

The Council requires this to be a commitment secured within the application management plans.

The Council also advocates effective and appropriate engagement with those communities that have the potential to be affected by the proposal throughout the pre-application and application engagement phase and for their comments to be fully taken into consideration as your proposals are finalised.

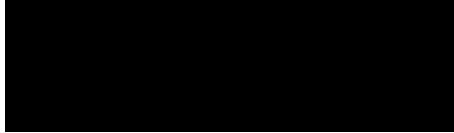
⁹ [Home | Alaw Mon Solar Farm \(alaw-mon-solar-farm.co.uk\)](http://alaw-mon-solar-farm.co.uk)

¹⁰ [Planning Application: FPL/2023/218 \(site.com\)](http://site.com)

To confirm once again, and as confirmed since our very initial engagement, the Council's support for the project is dependent on the confirmation of a sustainable form of development that has minimal impact on the environment and where the local socio-economic benefits and opportunities are fully maximized and appropriately secured. In this respect the applicant will need to show how the proposals align with the vision of the EIP, Council Plan, relevant policies of the Joint LDP as well as consideration of the likely cumulative effects with other projects.

The Council also confirms that it wishes to continue to engage with the applicant as it continues to develop the details as to the proposed development.

Yours sincerely



Christian Branch

Pennaeth Gwasanaeth – Gwasanaeth Rheoleiddio a Datblygu Economaidd
Head of Service - Regulation and Economic Development Service

Appendix 1 – List of all relevant Joint Local Development Plan (JLDP) Policies

PS 1	Language and culture;
PS 2	Infrastructure and Developer Contributions;
ISA 1	Infrastructure Provision;
TRA 1	Transport Network Developments;
TRA 4	Managing Transport Impacts;
PS 5	Sustainable Development;
PS 6	Alleviating and Adapting to the Effects of Climate Change;
PCYFF 2	Development Criteria;
PCYFF 3	Design and Place Shaping;
PCYFF 4	Design and Landscaping;
PCYFF 6	Water Conservation;
PS 7	Renewable Energy Technology;
ADN 2	PV Solar energy;
ADN 3	Other Renewable Energy and Low Carbon Technologies
PS 13	Providing Opportunity for a Flourishing Economy;
PS 19	Conserving and where appropriate enhancing the natural environment;
AMG 3	Protecting and enhancing features and qualities that are distinctive to the local landscape character;
AMG 5	Local biodiversity conservation;
AMG 6	Protecting sites of regional or local significance;
PS 20	Preserving and where appropriate enhancing heritage assets;
AT 3	Locally or regionally significant non-designated heritage assets;
AT 4	Protection of non-designated archaeological sites and their setting.
CYF1	Safeguarding, allocating and reserving land and units for employment uses
CYF 5	Alternative use of existing employment sites



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CYNGOR SIR YNYS MÔN
ISLE OF ANGLESEY COUNTY COUNCIL
Canolfan Fusnes Môn • Anglesey Business Centre
Parc Busnes Bryn Cefni • Bryn Cefni Business Park
LLANGFNI
Ynys Môn • Isle of Anglesey
LL77 7XA

Gofynnwch am / Please ask for: PMO
E-bost / Email: PMO@ynysmon.llyw.cymru
Ein Cyf / Our Ref:
Eich Cyf / Your Ref:

Dyddiad / Date: 11^{eg} Rhagfyr 2023

Annwyl Syr / Madam,

Deddf Cynllunio Gwlad a Thref 1990
Gorchymyn Datblygiadau o Arwyddocâd Cenedlaethol (Gweithdrefn) (Cymru) 2016
(Fel y'i Diwygiwyd)
Rheoliadau Cynllunio Gwlad a Thref (Asesu Effeithiau Amgylcheddol) (Cymru) 2017

Enw'r Prosiect: Prosiect Solar a Storio Ynni Maen Hir

Datblygiad Arfaethedig: Adeiladu, gweithredu, cynnal a chadw a datgomisiynu gorsaf gynhyrchu trydan solar ffotofoltaig (PV) gyda chapasiti o dros 350MW (megawat), a datblygiad cysylltiedig, gan gynnwys System Storio Ynni Batri (BESS) o hyd at 360MW ac arae solar PV cymunedol ~5MW.

Diolch am ofyn am gyngor gan Cyngor Sir Ynys Môn (y Cyngor) fel yr Awdurdod Cynllunio Lleol perthnasol yng nghyswllt cwmpas yr Asesiad o'r Effaith Amgylcheddol ar gyfer datblygiad arfaethedig prosiect Solar a Storio Ynni Maen Hir.

Y Cyngor yw'r Awdurdod Lletyol Lleol ar gyfer y prosiect, a hwn fyddai'r Awdurdod Cynllunio Lleol (ACLI) perthnasol at ddibenion cyflawni amodau cynllunio a monitro cydymffurfiaeth yng nghyswllt unrhyw gydsyniad DCO a roddir gan yr Ysgrifennydd Gwladol ar gyfer y prosiect. Y Cyngor fyddai'r Awdurdod Priffyrdd Lleol hefyd ar gyfer unrhyw dir priffyrdd a nodir o fewn ardal y prosiect.

Mae'r Cyngor yn cadarnhau ei fod wedi cael y cyfle i adolygu'r Adroddiad Cwmpasu a'i fod yn cyflwyno'r sylwadau a ganlyn mewn perthynas â chwmpas arfaethedig yr Asesiad o'r Effaith Amgylcheddol (AEA).

Mae'r Cyngor yn cadarnhau ei fod yn bryderus iawn ynghylch nifer a graddfa'r cynigion ar gyfer ffermydd solar a systemau storio ynni batri ar yr ynys. Yn arbennig, mae'r pryderon hyn yn cynnwys effeithiau cronus prosiectau arfaethedig Fferm Solar Maen Hir a Fferm Solar Alaw Môn sy'n debyg o ran eu maint, eu natur a'u lleoliad, ac sydd â'r potensial i gael effeithiau cronus arwyddocaol ar yr un cymunedau lletyol. Mae'r effeithiau'n cynnwys effeithiau ar y dirwedd a rhai gweledol, a'r rheiny yng nghyswllt traffig a thrafnidiaeth, yr amgylchedd, yr laith

Gymraeg, ei diwylliant a'r ymdeimlad o le, yn ogystal ag effeithiau ar sectorau twristiaeth ac amaethyddiaeth yr ynys, sy'n rhan annatod o'r economi leol.

Mae'r Cyngor yn cadarnhau ei fod wedi bod yn cynnal trafodaethau â'r ymgeisydd ynghylch prosiect Maen Hir o'i gyfnod dylunio cynnar ymlaen, ac mae'n gobeithio y bydd yr ymgysylltiad hwn yn parhau fel y bydd rhagor o fanylion mewn perthynas â'r prosiect, gan gynnwys yr AEA ac asesiadau ategol, ar gael i ni eu hadolygu a chyflwyno sylwadau yn eu cylch. Mae'r Cyngor yn cadarnhau hefyd ei fod y barod i drafod y sylwadau a godir yn yr ymateb hwn yn uniongyrchol gyda PINS a'r ymgeisydd, fel y bo'n berthnasol.

Mae'r Cyngor yn cadarnhau nad yw'r cyngor a ganlyn yn rhagfarnu sefyllfa'r Cyngor o ran y prosiect arfaethedig, gan gynnwys cyngor y Cyngor ar ôl derbyn rhagor o wybodaeth neu wybodaeth fanylach, gan gynnwys Datganiad Amgylcheddol (DA).

Mae'r Cyngor yn nodi bod y prosiect yn cynnwys adeiladu, gweithredu a chynnal a chadw a datgomisiynu gorsaf gynhyrchu trydan solar ffotovoltaig (PV) gyda chapasiti o dros 350MW (megawat), a datblygiad cysylltiedig, gan gynnwys System Storio Ynni Batri (BESS) o hyd at 360MW ac arae solar PV cymunedol ~5MW.

Mae'r Adroddiad Cwmpasu'n cadarnhau y caiff Is-orsaf 400kV newydd y Grid Cenedlaethol (Is-orsaf y Grid Cenedlaethol) gydsyniad ar wahân gan system Trawsyrro Trydan y Grid Cenedlaethol (NGET) ac nad yw'r Grid Cenedlaethol hyd yma wedi canfod y lleoliad ar gyfer yr Is-orsaf 400kV newydd hon. Fel yr Awdurdod Cynllunio Lleol, byddai'r Cyngor yn ddiolchgar am y cyfle i fod yn rhan o'r trafodaethau hyn ar y cyfle cyntaf.

Mae'r Cyngor hefyd yn nodi'r cadarnhad y bydd ceblau cysylltu'r grid ar gyfer Is-orsaf y Grid Cenedlaethol yn cynnwys ceblau 400kV o fewn ffos, a fydd yn hyd at 2.5m o ran dyfnder. Mae aliniad a llwybr Coridor y Cysylltiad â'r Grid yn cael ei ystyried o fewn Ardal yr Astudiaeth Gwmpasu, a chaiff ei fireinio trwy gydol y cyfnod y bydd y Prosiect yn mynd ymlaen trwy'r PEIR a'r Datganiad Amgylcheddol. Unwaith eto, byddai'r Cyngor yn croesawu rhagor o ymgysylltiad ynghylch llwybr y ceblau unwaith y bydd rhagor o wybodaeth ar gael.

Rhagwelir y bydd y cyfnod adeiladu yn mynd ymlaen dros hyd at ddau gyfnod dilyniannol, gyda'r rhaglen derfynol yn ddibynnol ar ddyluniad manwl y cynllun, ynghyd â'r cyfyngiadau amgylcheddol posibl o ran amseriad gweithgareddau adeiladu, a cheir manylion ynghylch hyn yn y Datganiad Amgylcheddol. Byddai'r Cyngor yn dymuno cael gwell dealltwriaeth o'r rhaglen adeiladu a'r effeithiau cysylltiedig unwaith y bydd y wybodaeth hon ar gael.

Cynigir y bydd cyfnod gweithredol y prosiect yn para am 60 mlynedd. Yn ystod y cyfnod gweithredol, byddai'r gweithgareddau ar y safle'n cynnwys gwaith gwasanaethu arferol, gweithgareddau cynnal a chadw a gosod offer newydd fel y bo angen, yn ogystal â rheoli llystyfiant.

Mae'r Cyngor yn nodi'r cadarnhad, er mwyn cynnal hyblygrwydd o ran y dyluniad a'r cynllun, y bydd y prosiect yn mabwysiadu ymagwedd Amlen Rochdale trwy nodi amrediadau'r paramedrau a ddiffinnir ym mhennod y Disgrifiad o'r Prosiect yn y Datganiad Amgylcheddol. Mae'r Cyngor yn croesawu'r cadarnhad y caiff y paramedrau eu hystyried yn fanwl gan awduron technegol yn y Datganiad Amgylcheddol, i sicrhau y caiff effeithiau realistig y prosiect o ran y senario waethaf eu hasesu ar gyfer pob derbynydd posibl.

Felly byddai cynllun adeiladu terfynol yn cael ei gyflwyno i'r Awdurdod Cynllunio Lleol fel rhan o'r gofynion DCO. Mae'r Cyngor yn cadarnhau y byddai angen i'r cynllun adeiladu terfynol ddangos y modd y byddai'r dyluniad yn ei ffurf derfynol yn cadw o fewn paramedrau unrhyw ganiatâd a roddir ar gyfer y datblygiad.

1. Safbwynt cyffredinol y Cyngor o ran datblygiadau carbon isel

Mae'r Cyngor wedi ymrwymo'n gryf i hyrwyddo, cefnogi a hwyluso cynnydd yn y sector ynni carbon isel trwy'r Rhaglen Ynys Ynni (RhYY)¹.

Mae RhYY Ynys Môn wedi bod ar waith am gyfnod o dros 10 mlynedd. Fe'i sefydlwyd i sicrhau y gall Ynys Môn fod 'yn esiampl i eraill wrth bontio at economi carbon-isel ffyniannus a gwydn, sy'n creu cyfleoedd ar gyfer gwaith, addysg a swyddi cadwyn gyflenwi o ansawdd uchel, gan hefyd warchod a gwella'r amgylchedd naturiol a chynorthwyo'r iaith Gymraeg a'i diwylliant i ffynnu mewn cymunedau llawn asbri.'

Roedd y Cyngor wedi datgan argyfwng hinsawdd ym mis Medi 2020, gan wneud ymrwymiad i ddod yn sefydliad sero net erbyn 2030. Ym mis Mawrth 2022 cafodd y 'Cynllun Tuag at Sero Net 2022 i 2025'² ei fabwysiadu'n ffurfiol gan y Cyngor, sy'n amlinellu ei ymrwymiad i'r argyfwng hinsawdd, a'r modd y mae'n bwriadu trawsnewid i ddod yn sefydliad sero net. Tra bo'r Cynllun yn canolbwyntio ar leihau allyriadau'r Cyngor, mae'n cydnabod hefyd y modd y mae gan y Cyngor rôl bwysig mewn cydweithredu â sefydliadau eraill a busnesau ar hyd a lled yr ynys trwy addasu a gwneud penderfyniadau a chymryd camau cytbwys, uniongyrchol ac anuniongyrchol, trwy gyfrwng y broses cynllunio defnydd tir, ymhlith pethau eraill.

Mae'r Cynllun yn cyfeirio'n benodol at y Rhaglen Ynys Ynni ac yn nodi, o ran y modd y cyflenwir y Rhaglen, efallai na fydd yn cael effaith uniongyrchol ar allyriadau carbon y Cyngor, ond y dylai ei ganlyniadau gefnogi ymdrechion y Cyngor i bontio at ddod yn sefydliad sero net.

Mae'r Cyngor yn nodi y byddai prosiect Maen Hir yn cynorthwyo i wireddu gweledigaeth drosfwaol ei Raglen Ynys Ynni yn nhermau cynhyrchu ynni carbon isel, ac felly'n cyfrannu tuag at darged sero net 2050 y DU yn ogystal â helpu i gyflawni dyheadau Llywodraeth Cymru fel yr amlinellir yn Ffyniant i Bawb: Cymru Carbon Isel. Cydnabyddir hefyd bod cyflawni llwybr carbon isel i Gymru yn cyfrannu at amcanion llesiant Llywodraeth Cymru.

Fodd bynnag, ers ei ymgysylltiad cychwynnol â phrosiect Maen Hir, mae'r Cyngor wedi cadarnhau bod cefnogaeth y Cyngor yn ddibynnol ar gadarnhau math cynaliadwy o ddatblygiad sy'n cael cyn lleied o effaith ar yr amgylchedd ag y bo modd, sy'n sicrhau y byddir yn manteisio'n llawn ar y buddion a'r cyfleoedd economaidd-gymdeithasol i'r ardal leol, a'u bod yn cael eu sicrhau mewn modd priodol. Gwneir hyn i gydweddu â gweledigaeth y RhYY, Cynllun y Cyngor a pholisïau perthnasol y Cynllun Datblygu Lleol ar y Cyd (CDLI ar y Cyd).

Fel rhan o'i ymagwedd tuag at ddatblygiadau mawr, mae'r Cyngor yn dymuno defnyddio'r hierarchaeth lliniaru sy'n cynnwys, yn y lle cyntaf, rhoi ystyriaeth i ganfod mesurau lliniaru er mwyn osgoi effeithiau niweidiol arwyddocaol, ac os nad yw'n bosibl osgoi effeithiau niweidiol, yna dylai mesurau i leihau'r effeithiau hyn gael eu hystyried, eu cytuno a'u sicrhau mewn modd addas.

Ni ddylid ond ystyried gwneud iawn am effeithiau, cymryd camau i wella'r effeithiau oddi ar y safle a/neu wneud gwaith adfer yng nghyswllt effeithiau os nad yw'n rhesymol bosibl i osgoi neu leihau effeithiau arwyddocaol.

Mae'r Cynllun Datblygu Lleol ar y Cyd (Ynys Môn a Gwynedd) (y CDLI ar y Cyd)³ yn darparu fframwaith polisi cynllunio defnydd tir yr Ynys ac yn cadarnhau pwysigrwydd sicrhau, lle bynnag y bo'n ddichonadwy ac yn hyfyw, bod ardal y cynllun yn gwireddu ei botensial fel ardal

¹ Gwefan Rhaglen Ynys Ynni CSYM (Dolen)

² Y Newid yn yr Hinsawdd (llyw.cymru)

³ Y Cynllun Datblygu Lleol ar y Cyd Cyfredol (llyw.cymru)

arweiniol ar gyfer mentrau sy'n seiliedig ar dechnolegau adnewyddadwy neu ynni carbon isel (Polisi Strategol PS 7: Technoleg Ynni Adnewyddadwy, ADN 2: Ynni PV Solar, ADN 3: Technoleg ynni adnewyddadwy a charbon isel arall a PS 13: Darparu cyfle ar gyfer economi ffyniannus).

Heb unrhyw amheuaeth, mae gan Ynys Môn, fel ynys, Naws am Le unigryw ac arbennig iawn. Mae'r laith Gymraeg yn llinyn euraidd, sy'n gwau hanes a threftadaeth, yn creu ymdeimlad cryf o gymuned, llesiant, y tir a'r dirwedd sydd wedi gwasanaethau'r gymuned dros y canrifoedd - sy'n allweddol i gynnal yr economi amaethyddol a chefnogi'r diwydiant twristiaeth, sy'n hanfodol o ran cynaliadwyedd economaidd yr ynys.

Mae'r Cyngor yn cadarnhau ei fod yn disgwyl y bydd unrhyw ddatblygwr sy'n dymuno datblygu ar yr ynys yn cydnabod y nodweddion unigryw ac arbennig hyn yn llawn ac yn eu cefnogi a'u hybu.

2. Ystyriaethau o ran Polisiâu

2.1 Polisi Cynllunio Cenedlaethol

2.2 Cymru'r Dyfodol

Ar 24 Chwefror 2021, cyhoeddwyd Cymru'r Dyfodol: Y Cynllun Cenedlaethol 2040 gan Lywodraeth Cymru ac mae'n ffurfio rhan o'r cynllun datblygu ar gyfer yr ardal ochr yn ochr â'r Cynllun Datblygu Lleol⁴.

Mae Cymru'r Dyfodol yn cydnabod bod gan Gymru nifer helaeth o gyfleoedd i gynhyrchu ynni adnewyddadwy ac yn datgan bod Llywodraeth Cymru wedi ymrwmo i wneud y gorau o'r potensial hwn. Mae cynhyrchu ynni adnewyddadwy yn rhan allweddol o'u hymrwymiad i ddatgarboneiddio a mynd i'r afael â'r argyfwng hinsawdd ac yn cyfeirio at y targedau uchelgeisiol a osodwyd gan y Llywodraeth ar gyfer cynhyrchu ynni adnewyddadwy.

Mae Polisi 17 - 'Ynni Adnewyddadwy a Charbon Isel a Seilwaith Cysylltiedig' yn darparu safbwynt cadarnhaol o ran polisi gan Lywodraeth Cymru yng nghyswllt cynhyrchu ynni adnewyddadwy a charbon isel, ac yn mynd ymlaen i roi dimensiwn gofodol y polisiâu sy'n berthnasol i barciau cenedlaethol, AHNEau a'r Ardaloedd a Aseswyd Ymlaen Llaw. Mae'r Polisi'n cadarnhau y dylai'r cynigion sicrhau nad oes unrhyw effaith andwyol annerbyniol sylweddol ar yr amgylchedd naturiol a chymunedau lleol o amgylch datblygiad ac y dylai'r datblygiad ddisgrifio'r buddion net o ganlyniad i'r cynllun, yn nhermau gwella cymunedau lleol o safbwynt cymdeithasol, economaidd, amgylcheddol a diwylliannol.

Mae Polisi 18 – 'Datblygiadau Ynni Adnewyddadwy a Charbon Isel o Arwyddocâd Cenedlaethol' yn ymwneud â datblygiadau ynni adnewyddadwy a charbon isel ar raddfa fawr (o faint Datblygiad o Arwyddocâd Cenedlaethol (DAC)) ac yn darparu fframwaith ar gyfer gwneud penderfyniadau. Mae wedi'i fframio'n gadarnhaol tuag at sicrhau mai caniatáu prosiectau yw'r man cychwyn, yn amodol ar gydymffurfiaeth â pholisi 17 a'r meini prawf a gynhwysir ym mholisi 18.

Mae'r meini prawf a nodir o dan Bolisi 18 yn datgan y dylid rhoi ystyriaeth i effaith y cynnig ar y dirwedd, cymunedau cyfagos ac anheddau unigol, safleoedd dynodedig, bioamrywiaeth, treftadaeth adeiledig, adlewyrchiad golau, cyfleusterau a gweithrediadau amddiffyn, y rhwydwaith cludiant ac effaith gronnsus y cais. Dylid rhoi ystyriaeth hefyd i ddefnyddio a rheoli adnoddau mewn modd cynaliadwy a bod darpariaethau o ran datgomisiynu ac adfer

⁴ [Cymru'r Dyfodol: y cynllun cenedlaethol 2040 | LLYW.CYMRU](#)

2.3 Polisi Cynllunio Cymru

Roedd Llywodraeth Cymru wedi cyhoeddi Argraffiad 11 o Bolisi Cynllunio Cymru (PCC)⁵ yn Chwefror 2021 a oedd yn rhoi ystyriaeth i ddogfen Cymru'r Dyfodol: Y Cynllun Cenedlaethol 2040 a Deddf Llesiant Cenedlaethau'r Dyfodol, sy'n ymgorffori saith nod llesiant.

Mae PCC yn darparu'r polisi cynllunio trosfwaol ar lefel genedlaethol ar gyfer Cymru, ac mae'n ystyriaeth berthnasol ochr yn ochr â Cymru'r Dyfodol. Mae'n ceisio cefnogi'r gofyniad am ddatblygu cynaliadwy trwy'r system gynllunio, lle mae'r rhagdybiaeth o blaid datblygu cynaliadwy yn ffurfio'r rôl drosfwaol ynghyd â safbwynt cadarn ar wella lles y boblogaeth.

Mae PCC yn nodi'r polisiâu cynllunio penodol ar gyfer cyflawni datblygu cynaliadwy ar hyd a lled Cymru. Mae Ffigur 4 yn nodi egwyddorion cynllunio allweddol y polisi cenedlaethol hwn, gan nodi "Mae gan y system gynllunio ran hanfodol i'w chwarae i sicrhau bod datblygiad yn gallu gwrthsefyll hinsawdd sy'n newid, ac i ddatgarboneiddio cymdeithas a datblygu economi gylchol er lles yr amgylcheddau adeiledig a naturiol a chyfrannu at gyflawni'r nodau llesiant."

Mae Pennod 5 (Lleoedd Cynhyrchiol a Mentrus) yn nodi polisiâu Llywodraeth Cymru o ran Creu Lleoedd Mentrus a Llesiant ar hyd a lled Cymru. Un o'r nodau allweddol yng nghyswllt ynni yw:

- *Cymru i gynhyrchu 70% o'r trydan y mae'n ei ddefnyddio o ynni adnewyddadwy erbyn 2030;*
- *Un Gigawat o'r capasiti trydan adnewyddadwy yng Nghymru i fod o dan berchnogaeth leol erbyn 2030; a*
- *Mynd ati i reoli'r gwaith o bontio i economi carbon isel.*

Mae paragraff 5.7.6 yn nodi'r modd y "Dylai'r system gynllunio sicrhau cymysgedd priodol o ddarpariaeth ynni sy'n cynyddu'r manteision i'n heconomi a'n cymunedau ac yn lleihau effeithiau amgylcheddol a chymdeithasol yr un pryd. Mae hyn yn rhan o nod Llywodraeth Cymru i sicrhau'r polisiâu datblygu economaidd cryfaf fel sail i dwf a ffyniant yng Nghymru, gan gydnabod pwysigrwydd datgarboneiddio a defnyddio adnoddau naturiol yn gynaliadwy fel sbardun economaidd ac fel ymrwymiad i ddatblygu cynaliadwy".

Mae paragraff 5.9.19 yn datgan: "Wrth benderfynu ar geisiadau ar gyfer yr amrywiaeth o dechnolegau ynni adnewyddadwy a charbon isel, dylai awdurdodau cynllunio ystyried:

- *cyfraniad y cynnig at gyflawni targedau Cymru, y DU ac Ewrop a'r potensial ar gyfer ynni adnewyddadwy;*
- *y cyfraniad at leihau allyriadau nwyon tŷ gwyr; a*
- *y manteision a'r cyfleoedd amgylcheddol, cymdeithasol ac economaidd ehangach yn sgil datblygiadau ynni adnewyddadwy a charbon isel"*

Mae paragraff 5.9.20 yn datgan: "Dylai awdurdodau cynllunio nodi a mynnu ffyrdd addas o osgoi, lliniaru neu wneud iawn am effeithiau andwyol datblygiad ynni adnewyddadwy a charbon isel. Dylai cynigion ar gyfer eu hadeiladu, eu rhedeg, eu datgomisiynu, eu trwsio ac ôlofalu amdanynt, ystyried:

- *yr angen i leihau effeithiau ar gymunedau lleol, megis trwy lygredd sŵn ac aer, er mwyn diogelu ansawdd bywyd cenedlaethau'r presennol a'r dyfodol;*
- *yr effaith ar yr amgylchedd naturiol a hanesyddol;*
- *effaith gronnu;*

⁵ [Polisi Cynllunio Cymru | LLYW.CYMRU](#)

- *capasiti'r rhwydwaith cludiant, a'r effeithiau ar y rhwydwaith hwnnw;*
- *materion yn ymwneud â'r cysylltiad grid lle cynigir datblygiadau ynni adnewyddadwy (trydan); ac*
- *effeithiau'r newid yn yr hinsawdd ar leoliad a dyluniad datblygiad ynni adnewyddadwy a charbon isel, y modd y caiff ei adeiladu a'r modd y caiff ei weithredu”.*

Hefyd mae Pennod 5 yn amlinellu, cyn cyflwyno cais "...dylai datblygwyr datblygiadau ynni adnewyddadwy a charbon isel, lle medrir, ystyried sut i osgoi effeithiau andwyol neu fan leiaf eu lleihau, trwy ystyried yn ofalus leoliad, graddfa, dyluniad a mesurau eraill”.

Mae'n annog datblygwyr i fynd ati'n weithredol i ymgysylltu â'r gymuned leol yng nghyswllt cynigion ar gyfer ynni adnewyddadwy. Dylai hyn gynnwys trafodaethau cyn gwneud cais a darparu gwybodaeth gefndirol am y dechnoleg ynni adnewyddadwy arfaethedig.

Mae PCC yn cadarnhau disgwyliad Llywodraeth Cymru i bob prosiect ynni adnewyddadwy newydd yng Nghymru gynnwys o leiaf un elfen o berchnogaeth leol, er mwyn cadw cyfoeth o fewn cymunedau a darparu budd gwirioneddol iddynt. Mae datblygiadau cynhyrchu ynni a berchnogir yn lleol yn darparu cyfle cryf i gadw gwerth economaidd, gan gyfrannu at ffyniant.

Mae Deddf Llesiant a Chenedlaethau'r Dyfodol (Cymru) 2015 yn rhoi dyletswydd llesiant ar gyrff cyhoeddus i gyflawni datblygu cynaliadwy. Yn y Ddeddf, mae "datblygu cynaliadwy" yn golygu'r broses o wella llesiant economaidd, cymdeithasol, amgylcheddol a diwylliannol Cymru trwy gymryd camau, yn unol â'r egwyddor datblygu cynaliadwy, sy'n anelu at gyflawni'r nodau llesiant.

Mae'r Cyngor yn gofyn i'r cais ddangos yn glir sut y mae'r datblygiad arfaethedig yn cyflawni'r nodau llesiant fel y diffinnir hwy gan y Ddeddf, er mwyn dangos ei fod yn fath cynaliadwy o ddatblygu.

2.4 Polisi Cynllunio Lleol

Cynllun Datblygu Lleol ar y Cyd Gwynedd a Môn (y CDLI ar y Cyd) yw'r cynllun datblygu lleol presennol ar gyfer Ynys Môn a Gwynedd, a fabwysiadwyd ar 31^{ain} Gorffennaf 2017. Penderfynwyd yn ddiweddar y caiff Cynlluniau Datblygu Lleol eu paratoi ar wahân ar gyfer Cynghorau Sir Ynys Môn a Gwynedd. Mae'r Cyngor wrthi ar hyn o bryd yn gweithio ar gamau cynnar y paratodau ar gyfer llunio'r Cynllun.

Mae'r Cyngor yn cadarnhau bod pob parcel o dir sy'n ffurfio rhan o'r cais wedi'i leoli y tu allan i unrhyw ffiniau datblygu o fewn y CDLI ar y Cyd, ac ni chafodd unrhyw un o ardaloedd y safle eu neilltuo ar gyfer defnydd penodol yn y CDLI ar y Cyd. Lleolir y safleoedd mewn ardal gefn gwlad agored y tu allan i AHNE Ynys Môn.

Yng nghyswllt cais ar gyfer fferm solar, y polisiau allweddol o fewn y CDLI ar y Cyd yw polisi strategol PS 7 'Technoleg Ynni Adnewyddadwy', polisi ADN 2 'Ynni PV Solar' ac ADN 3 (Technoleg Ynni Adnewyddadwy a Charbon Isel Arall).

Mae Polisi Strategol PS 7 yn hyrwyddo technolegau ynni adnewyddadwy os ydynt yn cydymffurfio â'r meini prawf o fewn y Polisi. O safbwynt y cynnig penodol hwn, dylid ystyried meini prawf (4) a (5) o'r Polisi hwn:

'Cefnogi gosod cyfarpar tu allan i ardaloedd wedi'u dynodi, cyn belled nad yw'r cyfarpar yn achosi niwed sylweddol y gellir ei brofi i gymeriad y dirwedd, bioamrywiaeth, neu fwynder llety neu lety gwyliau, naill ai yn unigol neu'n gronnus.'

Mae Polisi ADN 2 yn datgan y dylai ceisiadau am Ffermydd PV Solar o 5MW neu fwy gael eu cyfeirio tuag at ardaloedd chwilio posibl a ddangosir ar y Map Cynigion. Ni fydd cynigion ar y raddfa hon ond yn cael eu caniatáu mewn lleoliadau eraill mewn amgylchiadau eithriadol, pan fo modd cyfiawnhau'r angen am y cynllun ac o dan amgylchiadau lleoliadol arbennig. Yn ychwanegol i'r gofyniad hwn, dylai cynigion fodloni'r meini prawf o fewn y Polisi.

Fel rhan o'r sylfaen dystiolaeth ar gyfer y CDLI ar y Cyd, bu rhaid i'r Cyngor ymgymryd ag astudiaeth yng nghyswllt y potensial o ran clustnodi ardaloedd cyfleoedd ar gyfer cynlluniau ynni adnewyddadwy neu dechnolegau carbon isel eraill. Gwnaed hyn mewn ymateb i'r llythyr, dyddiedig 10 Rhagfyr 2015, gan y Gweinidog Cyfoeth Naturiol yng ngolau diweddariad i'r 'Canllaw Ymarfer: Cynllunio ar gyfer Ynni Adnewyddadwy a Charbon Isel – Pecyn Cymorth i Gynllunwyr' (Medi 2015).

Roedd gwaith cychwynnol, a ddefnyddiodd drothwy safleoedd o 0.5MW neu fwy, wedi canfod 36 o safleoedd posibl o fewn ardal y Cynllun. Roedd maint trothwy diwygiedig o 5MW neu fwy (sef y maint a ddefnyddir yn y pecyn cymorth) yn golygu y canfuwyd 11 o safleoedd, a gwelir y rhain o fewn Tabl 11 yn y testun eglurhaol ar gyfer Polisi ADN 2 fel ardaloedd cyfle posibl. Nid dyraniadau mo'r rhain, ond ardaloedd lle dylid cyfeirio cynigion o'r fath.

Mae'r Cyngor yn cadarnhau nad yw yr un o ardaloedd y safle wedi'u cynnwys o fewn yr ardaloedd cyfle posibl a nodwyd, ac felly, yn unol â gofynion polisi ADN 2, ni ddylid ond caniatáu cynnig o'r fath mewn lleoliadau o'r fath mewn amgylchiadau eithriadol, lle gellir cyfiawnhau'r angen am y cynllun, a bod amgylchiadau lleoliadol penodol.

Yn nhermau'r angen am y cynllun, fel y yr eglurwyd gan Lesley Griffiths (Ysgrifennydd y Cabinet dros yr Amgylchedd a Materion Gwledig) mewn llythyr, dyddiedig 7 Awst 2017: "Nid yw'r mater o ddangos yr angen am ynni adnewyddadwy wedi'i amlygu erioed fel ystyriaeth berthnasol yn y broses gynllunio ac mae'r prif agweddau hanfodol o ran cynhyrchu mwy o ynni adnewyddadwy i leihau effaith y newid yn yr hinsawdd a chyflawni ein targedau datgarboneiddio yn hollbwysig yn y cyswllt hwn."

Mae'r angen am y cynnig yn nhermau Polisi ADN 2 yn cyfeirio at y gofyniad i gyfiawnhau ardaloedd amgen i'r ardaloedd cyfleoedd posibl a nodir yn y Cynllun, yn hytrach na chwestiynu'r angen penodol am ffermydd PV solar ychwanegol.

Yng ngolau'r uchod, bydd rhaid cefnogi'r cyflwyniad ffurfiol gyda chyfiawnhad o'r angen am y cynllun, gan amlinellu pam na chafodd yr ardaloedd cyfle posibl a nodwyd yn y CDLI ar y Cyd eu hystyried gan yr ymgeisydd a/neu'r materion a oedd yn effeithio'r modd y gellir rhoi'r ardaloedd cyfle hyn ar waith. Yn ogystal â hyn, dylai cyfiawnhad o'r fath amlinellu'r amgylchiadau lleoliadol penodol a arweiniodd at ganfod y parseli penodol o dir sy'n rhan o'r cais yn seiliedig ar broses dewis safle. Mae'r Cyngor yn argymhell y dylid darparu'r wybodaeth hon mewn Adroddiad Dewis Safle.

Mae polisi ADN 2 hefyd yn cadarnhau'r angen i unrhyw fath o ddatblygiad gwynt neu solar gydymffurfio â'r meini prawf a ganlyn:

1. *Bod yr holl effeithiau ar gymeriad y dirwedd, asedau treftadaeth ac adnoddau naturiol wedi'u lliniaru yn ddigonol, gan sicrhau bod nodweddion arbennig holl ddynodiadau tirwedd, bioamrywiaeth a threftadaeth o bwysigrwydd lleol, cenedlaethol a rhyngwladol, gan gynnwys, lle bo'n briodol, yn eu lleoliadau yn cael eu diogelu neu eu gwella;*
2. *Ni fydd y cynnig yn arwain at niwed sylweddol i ddiogelwch neu fwynderau derbynyddion sensitif gan gynnwys effaith gan fflachio a llacharedd ac ni fydd yn cael effaith annerbyniol ar ddiogelwch ffyrdd, rheilffyrdd nac awyrennau;*

3. *Ni fydd y cynnig yn arwain at niwed sylweddol i fwynderau gweledol preswyl trigolion cyfagos;*
4. *Ni fydd y cynnig yn cael effeithiau cronus annerbyniol mewn perthynas â ffermydd PV solar cyfredol a'r rhai sydd â chaniatâd, ac unrhyw nodweddion amlwg eraill yn y dirwedd.*

Mae polisi ADN 3 (Technoleg Ynni Adnewyddadwy a Charbon Isel Arall) o'r CDLI ar y Cyd hefyd yn berthnasol i agwedd Storio Ynni Batri'r datblygiad. Mae'r polisi'n nodi y caniateir cynigion ar gyfer technolegau ynni adnewyddadwy a charbon isel, heblaw am ynni gwynt neu solar, sy'n cyfrannu at ddyfodol carbon isel, os yw'r cynnig yn cydymffurfio â'r meini prawf penodol a nodir o dan y polisi.

Yn Atodiad 1, cynhwysir rhestr lawn o'r holl bolisiâu perthnasol a gynhwysir yn y CDLI ar y Cyd sy'n berthnasol ac sydd angen eu hystyried fel rhan o unrhyw gais. Rhoddir sylw isod hefyd i'r ystyriaethau hyn o ran polisiâu, yng nghyswllt meysydd testun penodol.

2.5 Cynllun Adfywio Economaidd Gogledd Ynys Môn

Mae'r Cyngor wedi paratoi Cynllun Adfywio Economaidd Gogledd Ynys Môn er mwyn canfod rhaglen o gamau gweithredu i fynd i'r afael ag anghenion Gogledd Ynys Môn.

Mae'r Cynllun yn ymateb i'r heriau economaidd a wynebwr gan Ogledd Ynys Môn o ganlyniad i ddiffyg cyfleoedd cyflogaeth fel y mae busnesau'n penderfynu cau neu symud, ynghyd â datgomisiynu Gorsaf Bŵer Wylfa a'r ffaith bod Horizon wedi tynnu Prosiect Wylfa Newydd yn ôl.

Y Weledigaeth ar gyfer y cynllun, erbyn 2026, yw y bydd Gogledd Ynys Môn wedi datblygu gwell cyfleoedd o gyflogaeth ac isadeiledd ategol sy'n gwneud y gorau o'i amgylchedd naturiol, hanesyddol ac adeiledig, yn ategu cymeriad yr ardal ac yn hybu llesiant, cydlyniant cymunedol, yr iaith Gymraeg ac ansawdd bywyd. Bydd yr ardal yn lle deniadol i fyw, gweithio ac ymweld â hi.

Nid yw'r Cynllun Adfywio yn bodoli ar wahân. Mae'n adlewyrchu nifer o gynlluniau a pholisiâu ar y lefel genedlaethol a lleol, ac yn cael eu llywio ganddynt (gweler adran 5 o'r Cynllun).

Bydd y Cyngor yn gofyn am gadarnhad o ran y modd y mae'r cynnig yn cydweddu â'r weledigaeth a'r camau gweithredu a nodir o fewn Cynllun Adfywio Gogledd Ynys Môn.

2.6 Datblygiad arfaethedig ar hen safle Shell, Rhosgoch

Mae'r Cyngor yn nodi'r cadarnhad yn yr Adroddiad Cwmpasu bod y datblygiad arfaethedig yn cynnwys datblygu hen safle Shell yn Rhosgoch - mae hyn yn cynnwys safle Gogledd Maen Hir. Gellid datblygu'r safle i letya hwb strategol dros dro ar gyfer gweithrediadau logisteg yng nghyswllt gwaith adeiladu, ynghyd â phrosiect solar cymunedol 5MW a System Storio Ynni Batri. Mae'r Cyngor yn nodi hefyd y cadarnhad y gallai'r datblygiadau hyn gynnwys buddsoddiad mewn isadeiledd a allai helpu i ddatgloi gwaith datblygu ar y safle at y dyfodol i gefnogi defnyddiau sydd wedi'u cynllunio at ddibenion cyflogaeth a chynhyrchu ynni.

Mae'r Cyngor yn cadarnhau bod hen safle Shell yn safle cyflogaeth wrth gefn o fewn y CDLI ar y Cyd, sydd wedi'i diogelu at ddefnydd cyflogaeth (defnyddiau B1, B2 a B8) o dan bolisi CYF 1 o'r Cynllun (cyfeirnod map C(wg)39).

O fewn y CDLI ar y Cyd, mae hen safle Shell, Rhosgoch yn safle cyflogaeth wrth gefn, nid ar gyfer y galw o fewn y farchnad leol am ddefnyddiau diwydiannol neu fusnes cyffredinol, ond

yn hytrach ar gyfer defnyddiau busnes a chyflogaeth a fyddai, yn y lle cyntaf, yn darparu'n benodol ar gyfer anghenion Wylfa Newydd neu ddatblygiad 'Ynys Ynni'/'Ynys Fenter' arall. Byddai angen i gynigion ar gyfer defnyddiau B1, B2 neu B8 ar y safleoedd hyn ddangos nad oedd unrhyw safle cyflogaeth addas a oedd wedi'i ddiogelu neu ei ddynodi, neu fod y cyflenwad yn annigonol i ddiwallu'r angen.

Mae'r Cynllun yn cadarnhau bod gan y safleoedd hyn rôl bwysig o ran cynnal a diogelu cyfleoedd cyflogaeth at y dyfodol, ac felly'r bwriad yw eu diogelu at y dibenion hynny. Mae angen i unrhyw gynigion ar y safleoedd hyn a ddiogelir gydymffurfio'n llawn â Pholisi CYF 1 o'r CDLI ar y Cyd.

Mae Polisi CYF 5 o'r CDLI ar y Cyd yn darparu ar gyfer defnyddiau amgen ar gyfer safleoedd cyflogaeth presennol ac yn cadarnhau:

Mewn achosion arbennig yn unig y caniateir cynigion i ryddhau tir yn Nefnydd Dosbarth B1, B2 neu B8 ar safleoedd cyflogaeth presennol sydd wedi cael eu gwarchod yn unol â Pholisi CYF 1 ar gyfer defnyddiau amgen, a dim ond os gellir cwrdd gydag un neu fwy o'r meini prawf canlynol:

1. *Yn yr achos fod y safle yn wag ei fod yn annhebygol o gael ei ddefnyddio yn y tymor byr a chanolig ar gyfer y defnydd gwreiddiol neu ddefnydd y warchodaeth, neu*
2. *Mae yna orddarpariaeth o safleoedd cyflogaeth o fewn y cyffiniau, neu*
3. *Mae'r defnydd cyflogaeth bresennol yn cael effaith niweidiol ar fwynderau a'r amgylchedd, neu*
4. *Ni fyddai'r datblygiad yn cael effaith niweidiol ar ddefnydd cyflogaeth safleoedd cyfagos, neu*
5. *Nid oes yna safle amgen arall addas ar gyfer y defnydd arfaethedig, neu*
6. *Os yw'r safle yn cael ei ddefnyddio ar gyfer defnydd tymor byr (dros dro), bod yna fesurau adfer priodol mewn lle sydd i foddhad yr Awdurdod Cynllunio Lleol.*

Mae'r testun eglurhaol ar gyfer Polisi Cyf 5 yn cadarnhau 'mae'r Cynllun yn ceisio sicrhau fod yna ddarpariaeth ddigonol a phriodol o droedd ar gyfer dibenion cyflogaeth. Mae'n hanfodol fod y safleoedd hyn yn cael eu cadw cyn belled â phosib gan eu bod wedi'u lleoli mewn mannau sydd yn agos i ble mae pobl yn byw er mwyn lleihau'r angen i deithio i'r gwaith ac i gefnogi twf economaidd a'r economi leol. O'r herwydd gall colli defnyddiau cyflogaeth gael effaith negyddol ar fynediad i swyddi lleol a lleihau'r awydd i gystadlu yn yr ardal.'

Fodd bynnag, mae'r testun yn cadarnhau hefyd, 'dros amser, gall rhai eiddo neu safleoedd traddodiadol cyflogaeth fod yn segur ers tro. Ymhellach, cydnabyddir nad yw defnyddiau traddodiadol cyflogaeth yn tueddu i gynhyrchu gwerthoedd tir a fyddai'n cymharu â defnyddiau megis tai a manwerthu'.

Mae'r Cyngor yn cadarnhau ei fod yn barod i barhau i ymgysylltu â'r ymgeisydd yng nghyswllt datblygiad posibl hen safle Shell, Rhosgoch, i sicrhau cydweddiad rhwng y cynigion a'r CDLI ar y Cyd.

2.7 Porthladd Rhydd Ynys Môn

Mae Porthladd Rhydd Ynys Môn yn bartneriaeth gydweithredol rhwng y Cyngor a Stena Line, a bydd yn chwarae rôl ganolog o ran darparu cymhellion ychwanegol ar gyfer datblygu economaidd a thwf ar yr ynys, i hybu ffyniant (yn ogystal ag ar hyd a lled rhanbarth ehangach Gogledd Cymru). Os caiff ei ddynodi, y Cyngor fydd y corff atebol ar gyfer Porthladd Rhydd Ynys Môn.

Mae Porthladdoedd Rhydd yn bartneriaeth rhwng porthladdoedd gweithredol a'u hawdurdodau lleol lleolyol. Maent yn cynnwys dynodi safleoedd penodol ble bydd busnesau'n derbyn buddion penodol o ran treth (e.e. rhyddhad o Dreth Trafodiadau Tir, Trethi Busnes a Chyfraniadau Yswiriant Gwladol cyflogwyr, yn ogystal â lwfansau uwch ar gyfer cyfalaf ac adeiladau ac adeileddau).

Mae gan raglen Porthladd Rhydd Cymru dri phrif amcan:

- *Hyrwyddo adfywio a chreu swyddi o ansawdd uchel*
- *Sefydlu'r Porthladdoedd Rhydd fel canolfan genedlaethol ar gyfer masnach a buddsoddiad byd-eang ar draws yr economi*
- *Meithrin amgylchedd arloesol*

Ceir ffocws ychwanegol hefyd ar Waith Teg, Sero Net a'r Iaith Gymraeg.

Roedd gan gais Porthladd Rhydd Ynys Môn ddwy brif thema:

- *cynyddu masnach drwy'r porth (ac adfer y "Bont Wlad" rhwng Iwerddon â thir mawr Ewrop)*
- *denu buddsoddiad i safleoedd allweddol, gan y sector ynni carbon isel yn benodol, er mwyn cyd-fynd â'r Rhaglen Ynys Ynni*

Fel rhan o Borthladd Rhydd Ynys Môn, nodwyd safleoedd Treth a Thollau ar yr ynys (nodir bod Canllawiau'r Porthladdoedd Rhydd yn caniatáu amrywio ffiniau'r safleoedd Treth a Thollau rhwng y cam ymgeisio a chytuno'r Cynllun Busnes Amlinellol (CBA)). Mae Strategaethau Safleoedd Treth yn cael eu paratoi ar gyfer bob un o'r tri safle.

Mae'r Cyngor yn cadarnhau bod hen safle Shell, Rhosgoch, wedi'i nodi fel safle treth arfaethedig ac y byddai angen i unrhyw gynigion ar y safle gyd-fynd â gweledigaeth Porthladd Rhydd Ynys Môn.

Bydd angen ymgysylltiad parhaus rhwng yr ymgeisydd a'r Cyngor mewn perthynas â'r datblygiad arfaethedig yn hen safle Shell, Rhosgoch, er mwyn sicrhau cydweddiad â gweledigaeth a blaenoriaethau'r Porthladd Rhydd.

3. Yr Effaith ar y Dirwedd a'r Effaith Weledol

Mae Polisi 18 Cymru'r Dyfodol yn cadarnhau y caniateir cynigion ar gyfer datblygiadau ynni adnewyddadwy a charbon isel sy'n gymwys fel Datblygiadau o Arwyddocâd Cenedlaethol os ydynt yn cyflawni'r meini prawf a restrir, a nodir o dan y Polisi. Mae meini prawf 1 a 2 yn cadarnhau:

1. *y tu hwnt i'r Ardaloedd a Aseswyd Ymlaen Llaw ar gyfer datblygiadau gwynt a phob man ar gyfer pob technoleg arall, ni chaiff y cynnig effaith andwyol annerbyniol ar y dirwedd gyfagos (yn enwedig ar leoliad Parciau Cenedlaethol ac Ardaloedd o Harddwch Naturiol Eithriadol);*
2. *nid oes unrhyw effeithiau gweledol andwyol annerbyniol ar gymunedau nac anheddau unigol gerllaw;*

Mae'r Polisi'n cadarnhau hefyd y dylid ystyried effeithiau cronus cynlluniau ynni adnewyddadwy presennol a rhai sydd wedi'u caniatáu.

Hefyd, rhaid ystyried y darpariaethau a gynhwysir o fewn polisïau ADN2 a AND3 o Gynllun Datblygu Lleol Mabwysiedig Gwynedd ac Ynys Môn (y CDLI ar y Cyd) y cyfeiriwyd atynt eisoes yn Adran 2 o'r ymateb hwn.

Mae Adran 7.2 o Adroddiad Cwmpasu'r Asesiad o'r Effaith Amgylcheddol yn nodi'r ymagwedd a ddefnyddir ar gyfer yr asesiad o'r effeithiau ar y dirwedd a'r effeithiau gweledol.

3.1 Methodoleg

Mae'r Cyngor yn ystyried bod y modd y cyflwynwyd y fethodoleg arfaethedig ar gyfer yr asesiad o'r effeithiau ar y dirwedd a'r effeithiau gweledol yn creu dryswch i'r darllenyydd. Y unol â pharagraff 2.22 a'r Cyngor Cryno o dan 2.26 o'r Canllawiau ar gyfer Asesu'r Effaith ar y Dirwedd a'r Effaith Weledol (GLVIA) 'LVIA must deal with and clearly distinguish between the assessment of landscape effects, dealing with changes to the landscape as a resource, and the assessment of visual effects, dealing with changes in views and visual amenity.'

Nid yw'r meini prawf a gyflwynwyd ar gyfer yr asesiad gweledol ac ar gyfer yr asesiad o'r dirwedd wedi'u cyflwyno ar wahân.

- Mae Tabl 7-7 yn cyflwyno meini prawf yng nghyswllt rhagdueddiadau ar gyfer derbynyddion tirwedd a gweledol;
- Mae Tabl 7-8 yn cyflwyno meini prawf yng nghyswllt gwerth ar gyfer derbynyddion tirwedd yn unig;
- Nid oes unrhyw feini prawf yng nghyswllt gwerth ar gyfer derbynyddion gweledol;
- Mae Tablau 7-11 i 7-13 yn cyflwyno meini prawf yng nghyswllt graddau'r newid o ran newidiadau o safbwynt y dirwedd a rhai gweledol; a
- Mae Tabl 7-12 yn cyflwyno'r meini prawf yng nghyswllt cyfnod amser y newid. Byddai'n ddefnyddiol pe bai hyn yn cyd-fynd â chyfnod adeiladu'r prosiect a blwyddyn ddylunio'r asesiad ar gyfer lliniaru effeithiau gweithredol, y nodir ym mharagraff 7.2.93 ei fod yn gyfnod o 15 mlynedd. Byddai hyn yn helpu gyda'r naratif yng nghyswllt effeithiau gweithredol ym mharagraff 7.2.107.

Nid oes unrhyw eglurhad cynhwysfawr o ardal ddiffiniedig yr Astudiaeth Gwmpasu. Ni cheir ond cyfeiriadau ati yn nhestun y bennod ar Ecoleg, ond fe'i dangosir o fewn y ffigurau yn sawl un o'r penodau. I osgoi dryswch, dylid diffinio Ardal yr Astudiaeth Gwmpasu'n glir, a dylai fod yn gyson â hynny a ddisgrifiwyd yn y ffigurau ategol perthnasol o fewn yr Adroddiad Cwmpasu.

I osgoi unrhyw hepgoriad posibl neu gyfrif pethau ddwywaith yn yr asesiadau, dylai'r ymgeisydd egluro'r modd y mae'r cwmpas wedi'i rannu ynghyd â'r cysylltiadau methodolegol yn y rhyngwyneb rhwng y LVIA a'r bennod ar Dreftadaeth Ddiwylliannol. Dylai hyn gynnwys y modd mae agwedd dreftadaeth cymeriad y dirwedd a safleoedd dynodedig yn cael ei hystyried, ac yn lle.

Dylai hefyd egluro'r modd y byddir yn mynd i'r afael ag effeithiau ar arwyddocâd a lleoliad gweledol asedau treftadaeth dynodedig a rhai sydd heb eu dynodi (Ffigur 7-17), fel adeiladau rhestredig a henebion cofrestredig. Mae hyn yn aneglur yn y wybodaeth a gyflwynwyd i gefnogi'r Cais Cwmpasu.

3.2 Derbynyddion Tirwedd

Ymddengys fod lefel y manylion a'r manylder a gynigir ar gyfer yr asesiad tirwedd yn briodol ar sail dealltwriaeth o raddfa a maint y cynigion ar gyfer y datblygiad.

Nid yw'n glir pam fod derbynyddion dynodedig y dirwedd wedi'u cynnwys o dan Amwynder Gweledol yn 7.2.48 ac Effeithiau Gweledol yn Nhabl 7-14. Er efallai y ceir derbynyddion gweledol o fewn y tirweddau dynodedig hyn, mae'n arferiad i gyflwyno ac asesu tirweddau dynodedig fel derbynyddion tirwedd.

Fel y cyfeiriwyd uchod, mae paragraffau 2.22 a 2.26 y GLIVA yn cadarnhau y dylid asesu a chyflwyno'r effeithiau ar y dirwedd ac effeithiau gweledol ar wahân.

Dylai'r ymgeisydd ddarparu eglurhad pellach o ran y modd y caiff derbynyddion tirwedd dynodedig eu hasesu yn y LVIA.

3.3 Tybiaethau a chyfyngiadau

Mae tybiaethau a chyfyngiadau yn anorfod mewn gwaith sy'n asesu effeithiau ar y dirwedd ac effeithiau gweledol. Felly mae'n bwysig egluro pa bamedrau a thybiaethau a ystyriwyd wrth gwmpasu'r LVIA, yn ogystal â chyfyngiadau'r wybodaeth sydd ar gael hyd yma.

Mae cynnwys y Cais Cwmpasu ar lefel gymharol uchel o ran cwmpas y LVIA. Mae'n mynd i'r afael â rhai cyfyngiadau trwy'r testun cyfan (e.e. ym mharagraff 7.2.38 lle nodir y gall y ZTV newid wrth i'r dyluniad ddatblygu). Fodd bynnag, nid yw cynnwys Adran 7 yn nodi'r cyfyngiadau a'r tybiaethau trosfwaol yn glir.

Yn yr Adroddiad Gwybodaeth Amgylcheddol Rhagarweiniol (PEIR), cyfeirir at baragraff 6.6.6 yn y Cais Cwmpasu ym mhle mae'n awgrymu y bydd yr ymgeisydd yn disgrifio unrhyw dybiaethau a chyfyngiadau mewn perthynas â'r asesiadau, ond ni cheir tystiolaeth ar gyfer hyn i'r lefel y byddid yn ei disgwyl.

3.4 Dewis Golygfannau

Ceir diffyg eglurder o ran y gwahaniaeth rhwng pwrpas y 'Grwpiau o Dderbynyddion Gweledol' a'r sail resymegol dros ddefnyddio 'Golygfannau Cynrychioladol'.

Cydnabyddir nad yw'n ymarferol neu'n gymesur i ymweld â phob lleoliad y bydd y Prosiect yn weladwy ohonynt ac i dynnu eu lluniau a'u delweddu. Fodd bynnag, ymddengys bod yr holl dderbynyddion gweledol wedi'u cynnwys mewn dim ond ugain o olygfannau cynrychioladol a restrir yn Nhabl 7-5 ac a ddangosir ar Ffigurau 7-12 a 7-13. Ymddengys nad yw'r golygfannau cynrychioladol hyn yn cynnwys y golygfannau a gynhwysir yn y RVAA a'r ARA. O ran nifer o'r derbynyddion gweledol a restrir ym mharagraffau 7.2.120 i 7.2.122, nid oes modd eu cynrychioli'n realistig gan y golygfannau a ddewiswyd (ar sail ein dealltwriaeth bresennol).

Ystyri'r nad yw ugain o olygfannau cynrychioladol yn gymesur â maint, graddfa ac ardal ddaearyddol y Prosiect ar draws y tri pharsel sy'n rhychwantu tua 12km o'r gogledd i'r de.

Dylid nodi ei fod yn nodweddiadol bod cynigion sydd wedi'u cynnig neu wedi cael caniatâd ar hyn o bryd ar Ynys Môn ar gyfer ffermydd solar llawer llai, yn cynnwys tua ugain o olygfannau cynrychioladol. At ei gilydd, mae bob un o barseli arfaethedig Maen Hir yn cyfateb i faint datblygiad cyfan Alaw Môn neu Barc Solar Traffwll er enghraifft. Mae'r Cyngor yn gofyn am roi ystyriaeth bellach i'r ystod o olygfannau a fydd ar gael i lywio'r asesiad.

Dylai'r LVIA gynnwys asesiadau ar gyfer bob derbynydd gweledol, gan gynnwys derbynyddion preswyl a hamdden y mae potensial iddynt gael eu heffeithio'n sylweddol gan y datblygiad arfaethedig. Gellir grwpio derbynyddion a'u cynrychioli gan un olygfan lle bo'n briodol. Dylai'r golygfannau a ddewisir i gynrychioli'r derbynyddion hyn fod yn gymesur ac yn wirioneddol gynrychioladol. Byddai'r Cyngor yn rhagweld cael mynediad i asesiad yr

ymgeisydd o'r derbynyddion gweledol a'r golygfannau cynrychioladol pan fydd y wybodaeth hon ar gael.

Nid yw'r rhestr a ganlyn o olygfannau ychwanegol yn gyflawn ond mae'n rhestr o un neu ddau o dderbynyddion gweledol ar gyfer bob parcel a nodwyd, ar sail ffactorau o ran eu lefel uchel o sensitifrwydd a'u graddau, yr ystyrir eu bod yn cynrychioli dewis mwy cymesur o dderbynyddion gweledol. Tra caiff rhai o'r derbynyddion hyn eu rhestru ym mharagraffau 7.2.120 i 7.2.122, nid ydynt wedi'u mapio, ac felly mae'n anodd gweld p'un a yw'r cwmpasiad hwn yn cynnwys y derbynyddion priodol ar gyfer yr asesiad.

1. *Llwybr Hawl Tramwy Cyhoeddus (HTC) MECHELL 38/077/2 ar y pwynt yn lle mae'n cysylltu â'r llwybr hirbell cylchol yn gyfagos i ffordd ddi-ddosbarth. I'r gogledd-orllewin o'r parcel gogleddol. Derbynyddion: Cerddwyr, Gyrwyr, a Phreswylwyr.*
2. *I'r de o Llwybr Troed HTC RHOSYBOL 44/028/2. Canol y parcel gogleddol. Derbynyddion: Cerddwyr.*
3. *Pwynt ar hyd Llwybr Troed HTC MECHELL 38/067/2. I'r de o'r parcel gogleddol. Derbynyddion: Cerddwyr.*
4. *I'r de o Llwybr Troed TREF ALAW 47/021/1 yn y pwynt yn lle mae'n cysylltu â ffordd ddi-ddosbarth. I'r gogledd o'r parcel canolog. Derbynyddion: Cerddwyr, Gyrwyr, a Phreswylwyr.*
5. *Llwybr Troed HTC RHOSYBOL 44/027/1 ar y pwynt yn lle mae'n cysylltu â ffordd ddi-ddosbarth. I'r gogledd-ddwyrain o'r parcel canolog. Derbynyddion: Cerddwyr a Gyrwyr.*
6. *Pwynt ar hyd Llwybr Troed HTC LLANNERCH-Y-MEDD 25/003/. I'r de o'r parcel canolog. Derbynyddion: Cerddwyr.*
7. *I'r de o Llwybr Troed HTC RHOSYBOL 44/036/1 ar y pwynt yn lle mae'n cysylltu â Llwybr 5 o'r Rhwydwaith Beicio Cenedlaethol. I'r gogledd o'r parcel deheuol. Derbynyddion: Beicwyr, Cerddwyr, a Gyrwyr.*
8. *Prifffordd y B5111 ger pen deheuol Llwybr Troed LLANNERCH-Y-MEDD 25/013/1. I'r dwyrain o'r parcel deheuol. Derbynyddion: Gyrwyr a Phreswylwyr.*
9. *Pwynt ar hyd Llwybr 5 o'r Rhwydwaith Beicio Cenedlaethol. I'r gorllewin o'r parcel deheuol. Derbynyddion: Beicwyr, Gyrwyr, a Phreswylwyr.*

3.5 Effeithiau Gweledol Cyfunol

Dylai'r asesiad wahaniaethu rhwng y mathau gwahanol allweddol o effeithiau gweledol cyfunol. Sylweddolir, fel y nodir yn 7.2.124, y gall natur isel ac adrannol y datblygiad arfaethedig a'r tiffurf cyffredinol gyfyngu ar nifer y lleoliadau y mae'n bosibl gweld mwy nag un parcel datblygu gyda'i gilydd. Mae golygfannau o'r fath yn cynnwys y golygfannau uchel a amlygir yn y paragraff.

Fodd bynnag, yn ogystal â hynny, dylai'r asesiad gynnwys derbynyddion y gellir rhagweld y byddant yn gallu gweld rhannau o'r datblygiad yn olynol yn ystod taith. Mae'n debygol y bydd NCR 5 yn cael golygfeydd o barsei y de a'r parcel canolog. Mae'n debygol y bydd nifer o lwybrau hamdden yn cael golygfeydd o fwy nag un parcel yn ystod taith ar eu hyd.

Yn nhermau ffotogyfosodiadau, mae angen ymagwedd gymesur tuag at ddelweddu'r prosiect a'r effeithiau posibl, er mwyn llywio'r asesiad a chynorthwyo'r darlennydd. Ystyrir bod y ffaith

mai dim ond pum ffotogyfosodiad a gynigir i ddelweddu'r prosiect hwn ar draws tri pharsel mawr o dir yn annigonol. Ystyrir y byddai'n gymesur i ddarparu nifer o ddelweddiadau ar gyfer bob parcel datblygu, o amryw gyfeiriadau a phellterau. Dylai'r dewis o olygfannau ar gyfer delweddiadau gynnwys amrywiaeth o fathau o dderbynyddion, ynghyd â rhai sy'n debygol o brofi effeithiau gweledol arwyddocaol, yn ogystal â rhai na fyddant yn profi effeithiau o'r fath. Dylai'r ymgeisydd gytuno ar ystod ehangach o ffotogyfosodiadau neu ddarparu cyfiawnhad digonol a ran pam y cynigir dim ond pum ffotogyfosodiad. Mae hyn yn absennol ar hyn o bryd.

3.6 Effeithiau a Goleuadau yn ystod y Nos

Mae'n glir, ac ystyrir ei fod yn rhesymol (ar sail y wybodaeth a ddarparwyd) bod Asesiad o Effaith Goleuadau (LIA) ar wahân wedi'i gwmpasu allan o bennod yr LVIA. Fodd bynnag, cynigir goleuadau fel rhan o gyfnod adeiladu a datgomiynu'r prosiect, ac fel rhan o gyfnod gweithredu'r is-orsaf a BESS.

Felly dylai'r ymgeisydd ystyried effeithiau posibl goleuadau ar gymeriad y dirwedd ac ar olygfeydd perthnasol a gynhwysir yn y LVIA. Nid yw hyn yn golygu y bydd angen asesiad ar wahân o effeithiau goleuadau, ond mae'n gofyn am ystyriaeth o effeithiau posibl o fewn yr asesiad, a fydd yn arwain at ganfod cynigion priodol ar gyfer eu lliniaru er mwyn cael cyn lleied o effaith â phosibl ar dderbynyddion allweddol.

Mae'r Cyngor yn gofyn hefyd i unrhyw DCO gynnwys gofyniad sy'n gofyn am gymeradwyo cynllun goleuadau ar gyfer y datblygiad yn ystod y cyfnod adeiladu a'r cyfnod gweithredol (os yn briodol).

3.7 Effeithiau Cronnus

Ceir potensial am ddryswch o gwmpas yr asesiad o'r effeithiau cronnus. Yn nheitlau Ffigurau 7-12 a 7-13, defnyddir y gair 'cronnus' i ddisgrifio'r cyfuniad o ZTVs o'r gwahanol agweddau o Brosiect Maen Hir. Hefyd, yn y Datganiad Amgylcheddol, efallai y bydd angen dangos ZTVs wedi'u cyfuno â'r rheiny ar gyfer prosiectau cronnus eraill. Ym mharagraff 7.2.123, ceir cyfeiriad cywir at y ZTVs cyfunol hyn.

Nid yw'r LVIA, na'r Cais Cwmpasu ehangach mewn gwirionedd, yn gwneud unrhyw gyfeiriad at unrhyw brosiectau cronnus eraill ar gyfer eu cwmpasu i mewn neu allan o'r asesiad ar gyfer y Prosiect. Yn ogystal â hyn, ceir cyfeiriad cyfyngedig iawn at y modd y bydd angen i effeithiau cronnus ystyried newid parhaus yn y dirwedd erbyn yr adeg y byddai'r Prosiect yn cychwyn.

Mae nifer o gynigion mawr eraill wedi'u cynnig ar yr ynys sy'n cynnwys prosiectau ffermydd solar a BESS sy'n debyg o ran eu graddfa, eu natur a'u lleoliad i brosiect arfaethedig Maen Hir.

Fel modd o amlygu nifer fechan o brosiectau cronnus (posibl) perthnasol a allai arwain at gyfuniad o effeithiau, dylai'r ymgeisydd gyfeirio at Fferm Solar Alaw Môn a chyfleuster BESS Carreg Ganol. Dylai'r ymgeisydd gynnal adolygiad cynhwysfawr o'r ddau brosiect, ynghyd â phrosiectau y gellir eu rhagweld yn rhesymol, ac ymgynghori â'r Cyngor ynghylch ei restr o brosiectau cronnus arfaethedig.

Mae'n bwysig nodi, o ran cwmpas cronnus y LVIA, nad dim ond prosiectau y bydd yn bosibl eu gweld ar yr un pryd ac sy'n rhyngweladwy â Maen Hir a gynhwysir fel prosiectau cronnus. Gallant hefyd gynnwys prosiectau eraill sy'n weladwy i wahanol gyfeiriadau o olygfan, neu sy'n weladwy mewn lleoliadau olynol, er enghraifft, yn ystod siwrnai ar hyd NCR5.

3.8 Casgliadau o ran yr Effeithiau ar y Dirwedd ac Effeithiau Gweledol

Mae'r Cyngor yn argymhell bod angen i'r ymgeisydd adolygu'r wybodaeth a ganlyn:

- Cwmpasu'r asesiad cronrus ac wedyn, ar wahân, dod i gytundeb yn ei gylch a rhannu'r ymagwedd arfaethedig â'r Cyngor.
- Ailystyried y dewis o dderbynyddion a golygfannau cynrychioladol mewn perthynas â maint a graddfa'r Prosiect.
- Darparu dewis mwy cymesur o ffotogyfosodiadau ar gyfer golygfeydd o wahanol o bellterau ac onglau i gyfeiriad bob parcel, sy'n debygol o brofi amrywiaeth o effeithiau gweledol.
- Cynnwys yn y LVIA asesiad o'r potensial am effeithiau yn ystod y nos ar y dirwedd a golygfeydd o ganlyniad i oleuadau at ddibenion gwaith adeiladu a gweithredol.
- Adolygu'r fethodoleg ac (er eglurder) ystyried cyflwyno'r meini prawf ar gyfer yr asesiad o'r effeithiau ar y dirwedd a'r effeithiau gweledol ar wahân.
- Cynnwys rhagdybiaethau a chyfyngiadau cyffredinol ar gyfer yr asesiad o safbwynt disgyblaethau penodol i gynorthwyo i osod terfynau'r asesiad.
- Egluro a chwmpasu'r rhyngwyneb rhwng yr effeithiau ar y dirwedd a'r effeithiau gweledol a'r bennod ar dreftadaeth ddiwylliannol.

4 Treftadaeth Ddiwylliannol ac Archaeoleg

Mae maen prawf (6) o Bolisi 18 o Cymru'r Dyfodol yn nodi na ddylid bod unrhyw effeithiau andwyol annerbyniol ar asedau treftadaeth adeiledig a ddiogelir yn statudol.

Yn ogystal ag archaeoleg, efallai y bydd gan y datblygiad oblygiadau ar gyfer lleoliad asedau dynodedig ac o ran cymeriad y dirwedd hanesyddol. Cynghorir felly y dylid ymgynghori â Cadw ynghylch cwmpas yr asesiad a fynnir o leoliadau.

4.1 Archaeoleg

Mae'r Cyngor wedi ymgynghori â Gwasanaeth Cynllunio Archeolegol Gwynedd (GCAG), sef y curador rhanbarthol â swyddogaethau rheoleiddiol a chynghorol, ynghyd â chynghorydd y Cyngor, mewn perthynas â materion o ran archaeoleg.

Mae GCAG wedi adolygu'r rhannau perthnasol o'r adroddiad cwmpasu ac yn cadarnhau yr ymddengys fod methodoleg yr asesiad arfaethedig (yr ymchwil a'r meini prawf) yn briodol.

Mae GCAG o'r farn y bydd angen cloddio ffosydd prawf yn dilyn yr asesiad pen desg ac arolwg geoffisegol (paragraff 7.4.19 o'r adroddiad). Caiff cwmpas y ffosydd prawf ei lywio gan ganlyniadau'r camau blaenorol hyn, ond nid yw'n ddisgwyliedig mai geoffiseg fydd yr unig fodd o benderfynu cynllun y ffosydd, gan y cydnabyddir bod gan y dechneg hon gyfyngiadau ac mae pa mor ddibynadwy ydyw yn dibynnu ar y ddaear ac amodau'r ddaear. Fel y nodir yn yr adroddiad cwmpasu, mae GCAG eisoes wedi cymeradwyo Cynllun Ymchwilio Ysgrifenedig ar gyfer yr asesiad desg gan Cotswold Archaeology, ac wedi cychwyn trafodaethau ynghylch cwmpas a ffurf yr asesiad o'r lleoliad a'r gwerthusiad maes. Disgwylir y byddir yn bwrw ymlaen â'r trafodaethau a'r agweddau hyn yn ystod y flwyddyn nesaf.

Mae GCAG yn cytuno â'r elfennau a gaiff eu cwmpasu i mewn/allan o'r asesiad fel y nodir ym mharagraffau 7.4.41 a 7.4.42. Fodd bynnag, mae GCAG yn anghytuno â'r rhagosodiad cychwynnol bod effeithiau arwyddocaol ar yr amgylchedd hanesyddol yn annhebygol - ymddengys fod hyn yn rhagfarnu canlyniad yr asesiad a'r gwerthusiad sydd heb eu cyflawni eto. Er ei fod yn wir fod y math hwn o ddatblygiad a'i raddfa yn cynnig amryw opsiynau o ran osgoi, lleihau neu wrthbwyso effeithiau, nid yw'r dystiolaeth ar gael eto i alluogi dod i gasgliad

ynghylch arwyddocâd yr effeithiau hyn. Hyd yma, nid yw'n bosibl diystyru gwrthdaro rhwng dyluniad y cynllun ac archaeoleg dra sensitif sy'n anhysbys hyd yn hyn, na ellid ei leihau i effaith lai nag arwyddocaol yn nhermau AEA.

O ran canlyniadau'r asesiadau a'r gwerthusiad a gynhelir fesul cam, dylid eu cyflwyno fel adroddiadau technegol annibynnol, sy'n addas ar gyfer eu derbyn i'r Cofnod Amgylcheddol Hanesyddol (HER) rhanbarthol. Dylid cyflenwi'r rhain fel atodiadau i'r Datganiad Amgylcheddol, gyda'r canlyniadau'n cael eu crynhoi yn y bennod berthnasol fel y sylfaen dystiolaeth ar gyfer asesiad o'r effeithiau. Byddai GCAG yn disgwyl derbyn drafftiau o'r adroddiadau cyn cyflwyno AEA ar gyfer adolygiad technegol ac er mwyn hwylustod ar gyfer mynd ymlaen trwy'r camau asesu a'r broses gydsynio. Mae GCAG eisoes wedi trafod fformat arfaethedig yr adroddiadau gyda Cotswold Archaeology a'r swyddog HER, gan ystyried maint a lleoliadau neilltuol yr ardaloedd datblygu arfaethedig.

Rhaid i bob cam o'r gwaith gael ei gyflawni gan gwmni archaeolegol proffesiynol sy'n brofiadol o ran y technegau perthnasol a ddefnyddir, ac yn cyd-fynd â safonau a chanllawiau Sefydliad Siartredig yr Archaeolegwyr. Bydd angen cytuno ar gwmpas a methodoleg arfaethedig pob cam gyda GCAG ymlaen llaw.

4.2 Adeiladau Rhestredig

Mae Adran 7.4 o Adroddiad Cwmpasu'r AEA yn nodi'r dull a ddefnyddir ar gyfer cynnal yr asesiad o'r effaith ar Dreftadaeth Ddiwylliannol.

Ffigur 7-17 Asedau Treftadaeth Dynodedig - Mae Allwedd y Map yn cyfeirio at Ardaloedd Cadwraeth. Fodd bynnag, ymddengys nad yw Ardaloedd Cadwraeth Canol Amlwch, Porth Amlwch (yr ymddengys ei fod ychydig y tu hwnt i'r Ardal Astudiaeth Treftadaeth) a Llanfechell wedi'u plotio ar y map.

Mae cyhoeddiad Llywodraeth Cymru/Cadw 'Lleoliad Asedau Hanesyddol yng Nghymru, 2017' yn nodi:

- *Mae lleoliad yn bwysig i'r ffordd y mae asedau hanesyddol yn cael eu deall, eu gwerthfawrogi a'u profi ac mae'n cyfrannu at eu harwyddocâd.*
- *Mae lleoliad yn aml yn ymestyn y tu hwnt i ffin eiddo, neu 'gwrtil', ased hanesyddol unigol i gyd-destun tirwedd ehangach. Gall ffactorau anniriaethol yn ogystal â ffactorau ffisegol fod yn bwysig er mwyn deall lleoliad ased hanesyddol. Gall y rhain gynnwys swyddogaeth, canfyddiadau synhwyraidd neu gysylltiadau hanesyddol, artistig, llenyddol a golygfaol.*
- *Mae polisi cynllunio cenedlaethol yn annog awdurdodau cynllunio lleol i ystyried lleoliadau asedau hanesyddol wrth baratoi cynlluniau datblygu a phan fyddant yn penderfynu ar geisiadau cynllunio.*
- *Pan gynigir newid neu waith datblygu, mae'n bwysig nodi'r asedau hanesyddol y gellid effeithio arnynt, diffinio eu lleoliad a deall sut y mae'r lleoliad hwnnw'n cyfrannu at arwyddocâd yr asedau hanesyddol.*
- *Os yw newid neu waith datblygu arfaethedig yn debygol o gael effaith ar ased hanesyddol a'i lleoliad, dylai'r ymgeisydd baratoi asesiad ysgrifenedig cymesur a gwrthrychol o'r effaith honno er mwyn llywio'r broses benderfynu.*
- *Dylai cynigion datblygu geisio osgoi unrhyw effaith niweidiol ar ased hanesyddol a'i lleoliad.*

Mae pwysigrwydd ased treftadaeth yn seiliedig ar yr hyn y mae'n ei gyfrannu at arwyddocâd ased hanesyddol. Yn aml, mae lleoliad rhai mathau o adeiladau rhestredig, yn enwedig

eglwysi a melinau gwynt ac ati mewn ardaloedd gwledig, yn bwysicach nag y mae i adeiladau eraill.

Felly, er mwyn gallu cynnal asesiad llawn o'r golygfeydd i gyfeiriad yr asedau hanesyddol hyn, ac ar eu traws ac o gyfeiriad yr asedau hynny, mae'r Cyngor yn cynghori bod angen darparu delweddiadau o'r mathau hyn o asedau treftadaeth, gyda'r asedau'n cael eu nodi ar fapiau a ffotogyfosodiadau ategol.

5. Dosbarthiad Tir Amaethyddol

Mae Polisi Cynllunio Cymru'n datgan y dylid gwarchod y tir amaethyddol gorau a mwyaf amlbwrpas (gradd 1, 2 a 3a) a dylid rhoi cryn bwys ar ddiogelu tir o'r fath rhag ei ddatblygu. Ni ddylid datblygu tir o fewn graddau 1, 2 a 3a onid oes angen sy'n drech na dim arall am y datblygiad, ac os nad oes tir o radd is ar gael. Ailadroddir hyn o fewn Polisi PS 6 o'r CDLI ar y Cyd.

Mae'r Cyngor yn nodi'r cadarnhad y caiff Adroddiad Dosbarthiad Tir Amaethyddol ei baratoi i gefnogi'r cais cynllunio.

Mae'r Cyngor yn cyfeirio'r ymgeisydd a PEDW at Wasanaeth Cynghori ar Ansawdd Tir Llywodraeth Cymru i gael ei farn mewn perthynas ag effaith y cynnig ar dir amaethyddol o ansawdd uchel o fewn y safle arfaethedig.

6. Ecoleg

Mae Adran 7.3 o Adroddiad Cwmpasu'r AEA yn nodi'r dull a ddefnyddir ar gyfer cynnal yr asesiad o'r effeithiau o safbwynt ecolegol.

Mae meini prawf (3) a (4) o Bolisi 18 o Cymru'r Dyfodol yn cadarnhau bod angen i'r cynigion sicrhau nad oes unrhyw effeithiau andwyol annerbiniol ar gyfanrwydd safleoedd a ddynodwyd yn rhyngwladol a'r nodweddion y'u dynodwyd ar eu cyfer, ac nad oes unrhyw effeithiau andwyol annerbiniol ar safleoedd cenedlaethol a ddynodwyd yn statudol at ddibenion cadwraeth natur, cynefinoedd na rhywogaethau gwarchoddedig. Mae maen prawf (5) yn cadarnhau y dylai'r cynnig gynnwys mesurau gwella bioamrywiaeth er mwyn sicrhau mantais net i fioamrywiaeth.

Mae'r Cyngor yn cadarnhau ei fod yn fodlon â'r cynnig a amlinellir yn Adran 7.3 o'r Adroddiad Cwmpasu, lle mae'n berthnasol i fuddiannau'r Cyngor o ran asesu effeithiau posibl y cynnig ar y derbynyddion ecolegol a nodwyd.

Mae'r Cyngor yn cadarnhau ei fod yn ildio i CNC a'r RSPB (lle y bo'n berthnasol) mewn perthynas â materion o ran Rhywogaethau a Warchodir gan Ewrop, adar a safleoedd a warchodir, yn ogystal â'r gyfarwydddeb cynefinoedd.

Bydd y Cyngor eisiau i'r cais ddangos ei fod wedi ceisio cyfrannu tuag at warchod a gwella'r amgylchedd ynghyd ag osgoi effeithiau andwyol diwrthdro ar yr amgylchedd naturiol trwy ddyluniad arfaethedig a mesurau lliniaru corfforedig y datblygiad.

Nid yw'r wybodaeth yn sgil y gwaith cwmpasu yn cynnwys manylion y mesurau a gynigir i wella bioamrywiaeth. Mae'r Cyngor yn awyddus i drafod mesurau gwella posibl y gellid eu hintegreiddio o fewn y datblygiad gyda'r datblygwr ar y cyfle cyntaf.

Nodir y bydd goleuadau yn ystod y nos yn cael eu hosgoi. Os bydd angen unrhyw oleuadau ar gyfer y cyfnodau adeiladu neu weithredol, mae'r Cyngor yn gofyn am gyflwyno cynllun goleuadau i'w gymeradwyo o dan ofyniad a atodir i unrhyw gydsyniad DCO. Bydd angen i'r

holl oleuadau allanol ddilyn y canllawiau goleuadau yng nghyswllt Ystlumod a Goleuadau Artiffisial yn y Nos (BCT) ac awyr dywyll.

Mae'r Cyngor yn fodlon gyda'r arolygon ecolegol ac yng nghyswllt rhywogaethau a warchodir a gynhaliwyd ar y safle. Fodd bynnag, cynghorir bod angen sicrhau bod yr arolygon a ddefnyddir i lywio'r AES a'r cynigion o ran mesurau lliniaru yn parhau i fod yn gyfredol ac y defnyddir yr arolygon diweddaraf. Roedd rhai o'r arolygon y cyfeiriwyd atynt wedi cael eu cynnal o fewn y cyfnod 2021/22.

Argymhellir y dylid cynnal Adroddiad Coedyddiaeth i asesu'r holl goed a gwrychoedd a geir ar y safle. Dylai hwn hefyd amlinellu'r holl Ardaloedd Gwarchod Gwreiddiau a chadarnhau unrhyw lystyfiant y cynigir ei glirio.

Nodir y cyflwynir Cynllun Rheoli Amgylcheddau Adeiladu (CEMP) fel rhan o'r cais. Dylai'r CEMP gynnwys cyfeiriad at ganllawiau ar gyfer atal llygredd.

Yn ogystal â hynny, dylid cyflwyno Cynllun Rheoli Tirwedd ac Ecoleg (LEMP) fel rhan o'r cais. Dylai'r LEMP gynnwys mesurau rheoli ar gyfer ardaloedd gwella bioamrywiaeth presennol a rhai sydd wedi'u creu o'r newydd.

Bydd angen nodi clustogfeydd ar y cynlluniau arfaethedig ar gyfer pob ardal y nodir eu bod angen mesurau lliniaru a gwarchod. Mae angen darparu rhagor o fanylion a manylebau ar gyfer hynny yn ychwanegol i'r hyn a amlinellir/sonnir amdano o fewn y cynlluniau presennol.

7. Traffig a Thrafnidiaeth

Mae Adran 7.5 o Adroddiad Cwmpasu'r AEA yn nodi'r dull a ddefnyddir i asesu Effeithiau Traffig a Thrafnidiaeth.

Mae'r Cyngor yn gefnogol i'r dull a ddefnyddir ar gyfer yr asesiad, gyda chyfeiriad at y llwybrau mynediad a nodir ynghyd ag ymgymryd ar arolygon sylfaenol.

O ran y llwybrau a nodir a safleoedd arfaethedig y Cyfrifiadau Traffig Awtomatig (ATC), gwneir y sylwadau a ganlyn:

- O ran Llwybr 1, a gan gyfeirio at y pellter rhwng lleoliad ATC 3 a 5, dylid ystyried safle ATC ychwanegol ar yr A5025 yn Llanfaethlu.
- Ar Lwybr 2, byddai'n fuddiol cael pwynt arolygu ATC ychwanegol rhwng Trefor a Charmel ar y B5112.
- Mae'r Awdurdod yn ymwybodol o bryderon presennol y gymuned yng nghyswllt defnyddio cerbydau HGV ar ran o'r A5, sy'n cyd-fynd â Llwybr 5. Dylid ystyried safle ATC ychwanegol ar y llwybr hwn (A5 Gwalchmai). Mae Llwybr 5 yn dilyn ymlaen o'r A5 i gyfeiriad Bodffordd, ym mhle codwyd pryderon tebyg yn y gymuned yng nghyswllt cerbydau HGV. Dylid ystyried cael ATC ar y rhan hon o'r rhwydwaith priffyrdd.

Ystyrir nad oes angen unrhyw leoliadau ATC ychwanegol ar y llwybrau eilaidd o'r hwb cydgrynhoi.

Mae'r Cyngor yn gefnogol i'r Fethodoleg Asesu sy'n seiliedig ar y Canllawiau ar gyfer yr Asesiad Amgylcheddol o Draffig a Symudiadau (EATM).

Gan ystyried lleoliad arfaethedig yr hwb cydgrynhoi a'r lefelau uchel cysylltiedig o draffig sy'n mynd i mewn ac allan o'r safle hwn, dylid rhoi ystyriaeth arbennig i hyn yn yr AEA, yn enwedig y rhan rhwng yr A5025 i gyfeiriad Rhosgoch, gan gyfeirio at y testunau asesu trafndiaeth a mynediad yn y canllawiau EATM.

Yn yr AEA, dylid rhoi ystyriaeth i gynnwys pryderon ynghylch symudiadau traffig a diogelwch lleol na fyddent o reidrwydd yn cael eu nodi wrth ddilyn y fethodoleg a gynhwysir yn yr Asesiad Amgylcheddol o Draffig a Symudiadau (EATM) oherwydd ffactorau fel niferoedd isel.

Mae'r Cyngor yn nodi'r cadarnhad y bydd Datganiad Trafnidiaeth, sy'n sefyll ar ei ben ei hun, a Chynllun Rheoli Traffig Adeiladu Amlinellol yn cael eu cyflwyno gyda'r cais. Ar hyn o bryd, ni all y Cyngor gadarnhau y bydd Datganiad Trafnidiaeth yn ddigonol, ac nad oes angen i Asesiad Trafnidiaeth gynnwys asesiad llawn o effeithiau posibl y datblygiad arfaethedig ar Drafnidiaeth a Mynediad.

Mae'r Cyngor yn disgwyl y bydd y DA yn seiliedig ar ddealltwriaeth gadarn o'r amodau sylfaenol er mwyn sicrhau bod effeithiau posibl y prosiect ar drafnidiaeth a mynediad yn cael eu nodi'n briodol, a bod mesurau lliniaru priodol yn cael eu nodi wedyn a'u diogelu yn ffurf cynigion o ran rheolaeth.

Croesawir y cadarnhad y bydd Cynllun Rheoli Traffig Adeiladu (CRhTA) Amlinellol yn cael ei baratoi i gefnogi'r cais cynllunio, a byddai'r Awdurdod hefyd yn croesawu'r cyfle i gwmpasu manylion y CRhTA gyda'r ymgeisydd.

Mae'r Cyngor yn gofyn am gadarnhad o ran p'un a fydd y datblygiad yn effeithio unrhyw rai o lwybrau'r rhwydwaith beicio cenedlaethol, neu hawliau tramwy cyhoeddus. Os cadarnheir y bydd unrhyw effaith ar y derbynyddion hyn, byddai'r Cyngor yn dymuno trafod hyn ymhellach gyda'r ymgeisydd er mwyn lleihau'r effaith trwy sicrhau mesurau lliniaru priodol.

8. Gwarchod y Cyhoedd

Mae'r Cyngor yn fodlon gyda'r cynnig a nodir ym Mhenodau 7.6, 7.8, 7.14 o Adroddiad Cwmpasu'r ymgeisydd yng nghyswllt asesu effeithiau posibl y datblygiad arfaethedig yng nghyswllt Ansawdd Aer, Ansawdd y Tir ac Iechyd.

Mae'r Cyngor yn fodlon gyda'r mwyafrif o'r cynigion a nodir ym Mhenod 7.7 o Adroddiad Cwmpasu'r ymgeisydd yng nghyswllt asesu effeithiau posibl y datblygiad arfaethedig yng nghyswllt Sŵn.

Fodd bynnag, nodir nad oes unrhyw sôn am ddatblygiad arfaethedig fferm solar a system storio batri Alaw Môn a allai gael effaith gronnydd ar yr ardal os bydd y ddau ddatblygiad yn cydreded yn nhermau'r cyfnod adeiladu.

Enso Energy sy'n gyrru cynnig Alaw Môn yn ei flaen, ac mae'n cynnal ymgynghoriad cyhoeddusrwydd ac ymgynghori Cyn Ymgeisio (PAC) ar hyn o bryd ar gyfer y prosiect. Gellir cael rhagor o wybodaeth, gan gynnwys dogfennaeth ddrafft ar gyfer y cais ar wefan y prosiect⁶.

Tra bo hynny y tu hwnt i gwmpas y Datganiad Amgylcheddol, mae gan y Cyngor y sylwadau cynghorol a ganlyn ar gyfer yr ymgeisydd mewn perthynas ag effaith sŵn o ganlyniad i osod seilbyst i gynnal yr araeau PV solar.

Byddai'r Cyngor yn argymhell bod angen i'r ymgeisydd ffurfioli oriau gweithio a'r terfynau penodol ar gyfer sŵn a dirgryndod trwy fabwysiadu proses Adran o Ddeddf Rheoli Llygredd 1974 - 'Cydsyniad Ymlaen Llaw ar gyfer Gwaith ar Safleoedd Adeiladu' fel rhan o'r mesurau lliniaru ar gyfer y gwaith ailddatblygu hwn. Gellir cael rhagor o wybodaeth gan yr adran Gwarchod y Cyhoedd trwy EHEALTH@ynysmon.llyw.cymru

⁶ [Cartref | Fferm Solar Alaw Môn \(alaw-mon-solar-farm.co.uk\)](http://Cartref|FfermSolarAlawMôn(alaw-mon-solar-farm.co.uk))

Mae'r Cyngor yn gofyn am ragor o fanylion o ran y modd y gellir lliniaru effeithiau sŵn ergydion y morthwylion metel yn erbyn metel yn sgil y gweithrediadau ar gyfer gosod seilbyst.

Ceir sŵn ergydiol yn sgil y gweithrediadau i osod bob seilbost yn y ddaear ar gyfer yr araeau PV solar. Rhagwelir y byddai angen gosod miloedd o seilbyst yn y ddaear ar gyfer y datblygiad 350MW hwn.

Felly, mae'r Cyngor yn gofyn am ddatganiad ysgrifenedig ar y modd y bwriedir gosod y seilbyst yn y ddaear, y mesurau lliniaru arfaethedig, ynghyd â'r hyn a gydnabyddir fel y dull ymarferol gorau o fewn y diwydiant adeiladu.

Gyda chyfeiriad penodol at unrhyw weithrediadau ar gyfer gosod seilbyst o fewn pellter clywed agos i unrhyw dderbynnedd preswyl, byddai'r adran Gwarchod y Cyhoedd yn cynghori fel a ganlyn:-

Argymhellir yn gryf y dylai'r ymgeisydd gynnal arolwg o gyflwr allanol a mewnol yr holl eiddo preswyl a leolir yn agos i unrhyw weithgareddau yng nghyswllt gosod seilbyst / torri cerrig / pigo cerrig / gwaith dymchwel i'w gwirio am unrhyw graciau a difrod adeileddol sy'n bodoli eisoes. Byddai hyn nid yn unig yn diogelu'r datblygwr rhag unrhyw hawliadau cyfreithiol yng nghyswllt difrod ac ati, ond hefyd yn darparu rhyw lefel o gysur i breswylwyr y gellid mynd i'r afael ag unrhyw broblemau o ran yr eiddo o ganlyniad uniongyrchol i weithgareddau'r datblygwr mewn modd rhesymol a chymesur.

Y sail resymegol ar gyfer awgrymu'r ymagwedd hon yw bod gweithrediadau ar gyfer gosod seilbyst trwy ergydion morthwylion metel yn erbyn metel yn debygol o greu Niwsans Statudol (Adran 79(1)(g) o Ddeddf Diogelu'r Amgylchedd 1990). Gellid lliniaru hyn trwy ddefnyddio'r dull ymarferol gorau. Fodd bynnag, mewn rhai achosion efallai y bydd y datblygiad o fewn pellter clywed agos i eiddo preswyl oherwydd lleoliad anghysbell y datblygiad. Felly, byddai angen cadw cysylltiad agos ag unrhyw eiddo a effeithir yng nghyswllt datblygiad mawr o'r math hwn ynghyd â chynnal gwaith monitro ac ymgynghori â'r cyhoedd.

Yn ogystal, argymhellir y dylid cynnal y gwaith adeiladu yn unol â Dogfen CIRIA – C741, 2015–Arferion Amgylcheddol Da ar Safleoedd (4ydd argraffiad).

Ar ben hynny, lle bo angen paratoi'r safle gan ddefnyddio peiriannau torri cerrig niwmatig, bydd angen i'r datblygwr gymryd pob cam rhesymol i atal creu niwsans i feddianwyr cartrefi yn y cyffiniau o ganlyniad i sŵn, dirgryndod a llwch. Dylid hysbysu preswylwyr yn y cyffiniau ymlaen llaw ynghylch unrhyw waith swnllyd ac am faint y bydd y gwaith yn debygol o bara. Dylai camau rheoli addas a digonol fod ar waith i reoli llwch sy'n cael ei chwythu gan y gwynt o bentyrrau stoc cerrig.

8.1 Rheoli Gwastraff

Bydd y Cyngor yn gofyn am i'r CEMP Amlinellol gynnwys Cynllun Rheoli Gwastraff ar gyfer y Safle. Dylai'r Cynllun gynnwys manylion cynigion i leihau a rheoli gwastraff yn ystod pob cam o'r prosiect.

8.2 Oriau Gweithio

Bydd y Cyngor yn gofyn i'r CEMP amlinellol gadarnhau y cynhelir gweithgareddau adeiladu a danfoniadau o ddydd Llun i ddydd Gwener am 08:00 – 18:00 a rhwng 08:00 – 13:00 ar ddyddiau Sadwrn. Ni chynhelir unrhyw weithgareddau adeiladu neu ddanfoniadau ar ddyddiau Sul neu Wyliau Cyhoeddus.

Bydd y Cyngor hefyd yn gofyn am gadarnhad, lle'n bosibl, y caiff danfoniadau yng nghyswllt y gwaith adeiladu eu cydlynu i osgoi symudiadau gan gerbydau sy'n gysylltiedig â'r gwaith adeiladu yn ystod awr frig y bore (08:00-09:00) ac awr frig yr hwyr (17:00-18:00) ac y bydd amseroedd danfon a chodi plant o'r ysgol yn cael eu hosgoi (lle y bo'n berthnasol).

8.3 Diogelwch Tân

Roedd y Cyngor yn argymhell ymgynghori'n gynnar â Gwasanaeth Tân Gogledd Cymru, yn enwedig yng nghyswllt elfen storio ynni batri'r datblygiad arfaethedig.

9. Adnoddau Dŵr a'r Perygl o Lifogydd

Mae'r Cyngor yn fodlon gyda'r cynnig a nodir ym Mhennod 7.10 o Adroddiad Cwmpasu'r ymgeisydd yng nghyswllt asesu effeithiau posibl y datblygiad arfaethedig o ran Adnoddau Dŵr.

Mae'r Cyngor yn cyfeirio PINS a'r ymgeisydd i geisio barnau Cyfoeth Naturiol Cymru (CNC) yng nghyswllt materion sy'n ymwneud â'r Perygl o Lifogydd sy'n gysylltiedig â'r cynnig.

10. Ystyriaethau Economaidd-gymdeithasol

10.1 Cyfleoedd Lleol o ran Swyddi, Sgiliau a'r Gadwyn Gyflenwi

Mae Cymru'r Dyfodol yn cydnabod y gall cynlluniau ynni adnewyddadwy a charbon isel ar raddfa fawr gynhyrchu buddion cymdeithasol ac economaidd uniongyrchol ar gyfer cymunedau lleol.

Sefydlwyd Rhaglen 'Ynys Ynni' y Cyngor gyda gweledigaeth i greu cyfle unwaith-mewn-oes ar gyfer cael swyddi, twf economaidd a ffyniant trwy elwa ar nifer o brosiectau trawsnewidiol ar Ynys Môn.

Mae'r Weledigaeth Twf a luniwyd ar gyfer Bwrdd Uchelgais Economaidd Gogledd Cymru (NWEAB) yn cyfeirio at Ogledd Cymru fel ardal sydd yn un o'r lleoliadau gorau yn y DU ar gyfer cynhyrchu ynni a buddsoddiad yn y gadwyn gyflenwi sy'n gysylltiedig ag ynni.

Trwy gydol ei ymgysylltiad gyda'r datblygwr cyn cyflwyno cais cynllunio, mae'r Cyngor wedi cadarnhau ei fod yn dymuno cael cadarnhad ac ymrwymiad y byddid yn manteisio i'r eithaf ar y buddion economaidd-gymdeithasol sy'n codi o bob cyfnod o'r prosiect, ac y byddent yn cael eu diogelu'n briodol o fewn unrhyw ganiatâd a roddir ar gyfer y datblygiad. O ystyried graddfa'r prosiect, bydd y Cyngor yn chwilio am fuddion economaidd-gymdeithasol ystyrlon gan gynnwys buddion cymunedol.

Dylai buddion economaidd-gymdeithasol o'r fath gynnwys manteisio i'r eithaf ar gyfleoedd o ran swyddi, sgiliau a'r gadwyn gyflenwi yn ystod pob cam o'r prosiect (o'r cyfnod adeiladu i ddatgomisiynu) a dylai gydweddu â'r egwyddor agosrwydd lle caiff buddion eu canolbwyntio ar y cymunedau hynny sy'n lletya'r datblygiad.

Mae'r Cyngor wedi cadarnhau hefyd ei fod eisiau gweld mecanweithiau monitro priodol yn cael eu sefydlu i gadarnhau'r buddion gwirioneddol a gaiff eu gwireddu yn ystod y cyfnod y bydd y prosiect yn cael ei roi ar waith.

Mae'r Cyngor yn gofyn am i'r cais gael ei gefnogi gan 'Ddatganiad Buddion Economaidd' a 'Chynllun Cadwyn Gyflenwi a Sgiliau Cyflogaeth' Amlinellol. Bydd angen cytuno ar fersiwn manwl terfynol o'r 'Cynllun Cadwyn Gyflenwi a Sgiliau Cyflogaeth' gyda'r Cyngor o dan ofyniad

DCO sydd wedi'i eirio'n addas.

Dylai'r Datganiad Buddion Economaidd nodi buddion economaidd y datblygiad yn llawn, gan roi ystyriaeth lawn i'r defnydd o'r egwyddor agosrwydd.

Mae'r Cyngor yn ceisio ymrwymiad gan yr ymgeisydd y bydd canran o'r gweithlu ym mhob cyfnod o'r datblygiad yn dod o'r ardal leol ac y byddir yn cynnwys cyfleoedd ar gyfer uwchsgilio a phrentisiaethau.

Bydd y Cyngor yn gofyn am i'r 'Cynllun Cadwyn Gyflenwi a Sgiliau Cyflogaeth' gynnwys:

- *Dylid manylu ynghylch y bwriad i ddefnyddio llafur lleol lle bo hynny ar gael ac yn hyfyw o safbwynt masnachol;*
- *Lle'n ymarferol, a bod nwyddau a gwasanaethau ar gael ac yn gystadleuol o ran cost, dylid eu caffael gan gontractwyr, isgontractwyr a chyflenwyr lleol er mwyn cefnogi cyflogaeth leol;*
- *Dylid manylu ynghylch y cyfleoedd o ran recriwtio a hyfforddi sy'n gysylltiedig â'r datblygiad yn ystod y cyfnod adeiladu;*
- *Dylid cefnogi diddordeb mewn datblygu sgiliau o fewn yr ardal leol.*

Mae'r Cyngor yn gofyn am gael cyflwyno'r cynlluniau hyn i'r Cyngor a'u cymeradwyo ganddo o leiaf 4 mis cyn y cyfnod adeiladu. Bydd hyn yn sicrhau bod digon o amser i'r gweithgareddau a gynhwysir yn y Cynllun gael eu rhoi ar waith a'u gweithredu, ac i'r cyfleoedd a'r buddion lleol gael eu diogelu ac y byddir yn manteisio i'r eithaf arnynt.

Mae'r Cyngor hefyd yn gofyn am i'r drafodaeth yng nghyswllt cyfleoedd a buddion lleol barhau gyda'r Cyngor a rhanddeiliaid allweddol wrth i'r broses gynllunio fynd rhagddi. Bydd hyn yn sicrhau y byddir yn manteisio i'r eithaf ar y buddion lleol.

Mae'r Cyngor yn cadarnhau bod angen cynnwys amrywiaeth o randdeiliaid allweddol yn y drafodaeth ynghylch hyrwyddo cyfleoedd lleol, ac mae'r rhain yn cynnwys (ond nid ydynt wedi'u cyfyngu iddynt) Llywodraeth Cymru, Partneriaeth Sgiliau Rhanbarthol Gogledd Cymru, Uchelgais Gogledd Cymru, M-Sparc, darparwyr addysg lleol (Grŵp Llandrillo Menai a Phrifysgol Bangor) ynghyd â Thîm Datblygu Economaidd y Cyngor a'r Gwasanaeth Addysg.

Bydd y Cyngor eisiau i'r cais ddangos dealltwriaeth o'r sgiliau lleol a'r gadwyn gyflenwi sydd ar gael i'r prosiect ynghyd ag ymrwymiad i sicrhau y bydd y prosiect yn defnyddio canran o'r hyn sydd ar gael yn lleol yn ystod y cyfnodau adeiladu, gweithredol a datgomisiynu. Bydd y rolau yn ystod y cyfnod gweithredol, a fydd yn para am gyfnod o 60 mlynedd, yn cynnwys peirianeg sifil, rheoli tir, gweithrediadau a chynnal a chadw, y mae pob un ohonynt ar gael yn lleol.

Mae'r Cyngor yn disgwyl y bydd y sgwrs ynghylch diogelu cyfleoedd economaidd-gymdeithasol yn parhau gyda'r Cyngor, yn enwedig fel y daw rhagor o fanylion ar gael yng nghyswllt gofynion y prosiect mewn perthynas â llafur a'r gadwyn gyflenwi. Bydd hyn yn sicrhau cydweddiad llawn â gweledigaeth Rhaglen Ynys Ynni'r Cyngor.

10.2 Twristiaeth

Twristiaeth yw'r sector economaidd mwyaf ar yr ynys, gyda phobl yn dod i Ynys Môn i brofi ei chymeriad unigryw a'i hymdeimlad arbennig iawn o le, ei lleoliad tawel, ei thraethau, ei morweddau a'i thirweddau dramatig. Ei hasedau gorau o ran twristiaeth yw ei hamgylchedd

naturiol a hanesyddol a'i thirwedd, sydd wedi cael cydnabyddiaeth a dynodiadau ar lefel genedlaethol a rhyngwladol.

Mae'r Cyngor yn ddiweddar wedi mabwysiadu Cynllun Rheoli Cyrchfan (DMP) ar gyfer y cyfnod 2023 i 2028 sy'n cynllunio ar gyfer dyfodol twristiaeth a'r economi ymwelwyr ar yr ynys hyd at 2028. Mae'r Cynllun yn nodi cryfderau, heriau neu rwystrau i'w goresgyn ynghyd â'r cyfleoedd ar gyfer prosiectau sy'n flaenoriaeth ar gyfer dyfodol twristiaeth a'r economi ymwelwyr ar yr ynys. Gyda newidiadau cyflym yn yr economi ymwelwyr, mae'n hanfodol ein bod yn cydbwysio anghenion preswylwyr, cymunedau ac ymwelwyr. Ond rhaid hefyd bod yn ystyriol o nodweddion arbennig Ynys Môn a'r rheswm pam y mae pobl yn ymweld â'r ardal yn y lle cyntaf.

Mae'r Cyngor yn disgwyl i'r asesiad roi ystyriaeth lawn i'r DMP.

Bydd y Cyngor eisiau i'r cais gynnal asesiad priodol o'r effeithiau posibl sy'n deillio o bob cyfnod o'r prosiect ar sector twristiaeth yr Ynys. Mae'r Cyngor yn nodi'r cadarnhad yn yr Adroddiad Cwmpasu bod atyniadau i ymwelwyr sy'n agos i'r datblygiad yn cynnwys Mynydd Parys, Clwb Golf Porth Llechog, Cronfa Ddŵr Llyn Alaw a Gwesty Treysgawen.

Mae'r Cyngor yn croesawu'r cadarnhad y bydd yr asesiad yn cynnwys asesu'r newid yn y galw am lety dros dro i weithwyr, gan gynnwys llety gosod tymor byr.

Mae angen hyn er mwyn cadarnhau p'un a oes gan y prosiect y potensial i effeithio ar y sector twristiaeth ac i gadarnhau p'un a oes angen canfod mesurau lliniaru priodol i leihau effeithiau. Mae'r Cyngor yn nodi'r cadarnhad y gallai'r cynnig gael effaith fanteisiol ar y sector twristiaeth trwy sicrhau gwelliannau i Hawliau Tramwy Cyhoeddus a llwybrau twristiaid. Byddai'r Cyngor yn croesawu rhagor o fanylion mewn perthynas â'r gwelliannau posibl hyn, gan gynnwys cadarnhad o ran y modd y byddir yn eu sicrhau.

10.3 Yr Iaith Gymraeg a'i Diwylliant

Mae Polisi PS 5: Datblygu Cynaliadwy o'r CDLI ar y Cyd yn cadarnhau ym maen prawf 4 y dylai bob cynnig 'Warchod, cefnogi a hyrwyddo defnydd o'r iaith Gymraeg yn unol â Pholisi Strategol PS 1'.

Mae Polisi Strategol PS 1 - Yr Iaith Gymraeg a'r Diwylliant Cymreig o'r un cynllun yn darparu fframwaith ar gyfer ystyried sut y mae'r datblygiad yn cyflawni hyn. Mae'r Polisi'n cadarnhau bod angen Datganiad Iaith Gymraeg neu Asesiad Iaith Gymraeg lle mae datblygiad yn dod o fewn y categorïau penodol. Mae hyn yn sicrhau bod y datblygiad, lle bo angen, yn gwarchod, hyrwyddo a chryfhau'r iaith Gymraeg.

Cynhwysir methodoleg ar gyfer paratoi Asesiad/Datganiad o fewn y Canllawiau Cynllunio Atodol (CCA) Cynnal a Chreu Cymunedau Nodedig a Chynaliadwy⁷.

11. Ymrwymiad Lleol a Buddion Cymunedol

11.1 Ymagwedd y Cyngor

Mae Polisi 17 Cymru'r Dyfodol (Chwefror 2021) yn gofyn i ymgeiswyr ddisgrifio'r buddion net a ddaw yn sgil datblygiad arfaethedig yn nhermau gwelliannau cymdeithasol, economaidd, amgylcheddol a diwylliannol o fewn cymunedau lleol.

⁷ [SPG-Maintaining-and-Creating-Distinctive-and-Sustainable-Communities.pdf \(anglesey.gov.uk\)](#)

Mae paragraff 5.9.24 o Bolisi Cynllunio Cymru yn nodi bod Llywodraeth Cymru'n cefnogi prosiectau a ddatblygir gan sefydliadau a leolir yn gyfan gwbl yng Nghymru, gan gynnwys grwpiau cymunedol, neu sy'n darparu budd cymesur i'r gymuned sy'n lletya datblygiad neu ar gyfer Cymru yn ei chyfanrwydd.

Yn Chwefror 2020, cyhoeddodd Llywodraeth Cymru ddatganiad polisi ar berchnogaeth leol o ddatblygiadau ynni. Roedd hwn yn nodi disgwyliad Llywodraeth Cymru i bob prosiect ynni adnewyddadwy newydd yng Nghymru gynnwys o leiaf un elfen o berchnogaeth, i gadw cyfoeth o fewn cymunedau ac i ddarparu budd gwirioneddol iddynt. Mae cynlluniau cynhyrchu a berchnogir yn lleol yn darparu cyfle cryf i gadw gwerth economaidd, sy'n cyfrannu at ffyniant.

Mae paragraff 5.9.26 yn cadarnhau bod 'profiad wedi dangos bod cyfleoedd sylweddol i gyflawni mantais leol drwy ddatblygiadau ynni adnewyddadwy. Gellir cyfiawnhau rhai manteision fel lliniaru effeithiau datblygu drwy'r broses gynllunio. Hefyd, gall datblygwyr gynnig manteision nad ydynt yn uniongyrchol gysylltiedig â'r broses gynllunio. Lle y bo'n ymarferol, dylai awdurdodau lleol hwyluso ac annog cynigion o'r fath'.

Gall Gwasanaeth Ynni Llywodraeth Cymru ddarparu cefnogaeth a chynngor ynghylch ymrwymiad lleol o ran datblygu ynni adnewyddadwy a manteisio arno.

Er mwyn i Ynys Môn a'i chymunedau elwa'n llawn ar yr effeithiau cadarnhaol a ragwelir yn sgil datblygiad mawr, mae'r Cyngor Sir wedi paratoi Strategaeth Cyfraniadau Budd Cymunedol gwirfoddol⁸.

Mae'r Cyngor yn cadarnhau ei fod wedi ymrwymo i sicrhau y bydd pob cymuned yn cael budd uniongyrchol o ddefnyddio eu hadnoddau a'u hamgylchedd lleol gan bob prosiect mawr ar Ynys Môn. Mae'r Cyngor yn disgwyl y bydd pob prosiect mawr yn cyflenwi "etifeddiaeth" gadarnhaol ar gyfer Ynys Môn, gyda'u datblygu, eu gweithredu a'u hadeiladu yn gwneud cyfraniad cadarnhaol tuag at lesiant, ansawdd bywyd a chynaliadwyedd yr ynys a'i chymunedau.

Mae cyfraniadau budd cymunedol gwirfoddol yn darparu cyfle go iawn i ddatblygwyr prosiectau mawr ddarparu manteision ystyrion (bo'r rheiny'n gyfraniadau ariannol a/neu mewn ffyrdd eraill) mewn cydnabyddiaeth o'r baich, yr aflonyddwch a'r anhwylystod o gael eu gorfodi ar y cymunedau sy'n lletya eu datblygiadau. Fel y cadarnhawyd yn y Strategaeth, bydd y Cyngor yn rhagweithiol, yn gyson ac yn dryloyw o ran ei ymagwedd tuag at weithio gyda phartneriaid yn y sector preifat a chyhoeddus, ynghyd â chymunedau'r ynys, i ddiogelu buddion ystyrion sy'n mynd i'r afael ag anghenion Ynys Môn.

Mae'r Cyngor yn cydnabod nad oes ganddo unrhyw bwerau i orfodi datblygwyr i ddarparu cyfraniadau budd cymunedol gwirfoddol, a bod rhaid i ddatblygwyr ystyried eu bod yn fforddiadwy yn nhermau'r costau cyffredinol ac elw eu prosiectau yn ystod eu hoes. Fodd bynnag, mae'r disgwyliad clir a chryf yn parhau, o du'r Cyngor a'r gymuned leol, i'r fferm solar arfaethedig ddarparu buddion cymunedol gwirfoddol hirdymor i'r gymuned sy'n ei lletya, yn unol â'r egwyddor agosrwydd ar gyfer oes y prosiect.

Mae defnyddio'r egwyddor agosrwydd yn sicrhau y caiff y buddion eu canolbwyntio ar y cymunedau hynny sy'n lletya'r datblygiad ac sy'n teimlo effaith a baich y datblygiad trwy gydol ei oes (o ran ei adeiladu, ei weithredu a'i ddatgomisiynu).

⁸ [Strategaeth Cyfraniadau Budd Cymunedol \(llyw.cymru\)](#)

11.2 Adroddiad Buddion Cydweithredol

Mae Llywodraeth Cymru yn ystyried bod Adroddiad Buddion Cydweithredol yn ddull ymarferol o wella tryloywder trwy gydol y broses ddatblygu a'i fod yn cynyddu cyfranogiad yr holl randdeiliaid. Mae'r Cyngor yn argymhell paratoi adroddiad i gefnogi'r cais cynllunio.

Dylai'r Adroddiad fanylu ynghylch y daith ymgysylltu â chynnwys cofnod o'r deialog ynghylch perchnogaeth leol a rhanberchnogaeth. Mae canllawiau drafft Llywodraeth Cymru ar Berchnogaeth Leol yn nodi y dylid cyflwyno'r Adroddiad Buddion Cydweithredol fel tystiolaeth o arferion da a chefnogaeth leol, ochr yn ochr â'r prif ddogfennau cynllunio. Mae hyn yn unol â gofyniad Polisi Cynllunio Cymru (PCC) i geisiadau ddangos buddion llawn unrhyw ddatblygiad.

Mae'r Adroddiad yn ddull defnyddiol i ddangos y buddion cymdeithasol, economaidd, amgylcheddol a diwylliannol y gallai'r datblygiad arfaethedig eu cyflenwi. Mae hyn felly'n cysuro'r penderfynedd, ymgynghoreion a'r gymuned leol bod y buddion cydweithredol arfaethedig a nodwyd yn realistig, a bod modd eu diogelu a'u cyflawni, ac y dylid eu cynnwys fel rhan o gydbwysu'r ystyriaethau yng nghyswllt cynllunio. Mae hefyd yn darparu trosolwg o'r ymgysylltu sydd wedi digwydd (a'i ganlyniadau) gyda chymunedau lleol i geisio canfod cyfleoedd ar gyfer cyflawni buddion lleol.

Byddai'r Cyngor yn croesawu'r cyfle i gael trafodaeth bellach ynglŷn â'r cynnig o ran buddion cymunedol gyda'r ymgeisydd. Mae'r Cyngor yn nodi'r cadarnhad bod y datblygiad yn cynnwys datblygiad solar cymunedol 5MW.

Ar gyfer datblygiadau ynni carbon isel eraill ar yr ynys, sefydlwyd cronfa budd cymunedol etifeddol y telir i mewn iddi'n flynyddol drwy gydol y cyfnod gweithredol. Mae'r Cyngor yn ystyried bod hyn yn fodd effeithiol i ddarparu math ystyrion a manteisiol o fuddion a all gael effaith gadarnhaol ar lesiant, ansawdd bywyd a chynaliadwyedd y gymuned letyol.

Fel y cadarnhawyd uchod, o ran ei ymagwedd at fuddion, mae'r Cyngor yn gofyn am ddefnyddio'r egwyddor agosrwydd i sicrhau mai'r cymunedau hynny a effeithir gan bob cyfnod o'r datblygiad a fydd yn derbyn manteision ystyrion gan y datblygwr (bo'r rheiny'n rhai ariannol a/neu ar ffurf cyfraniadau o fath arall), i gydnabod y baich, yr aflonyddwch a'r anghyfleustra a orfodir ar y cymunedau o ganlyniad i letya eu datblygiad. Mae'r Cyngor felly'n disgwyl y bydd y budd cymunedol ar gyfer y datblygiad arfaethedig yn darparu mantais ystyrion i'r gymuned letyol leol.

Mae'r Cyngor yn argymhell yn gryf y dylai'r ymgeisydd ymgynghori â'r Cynghorau Cymuned perthnasol yng nghyswllt yr Adroddiad Buddion Cydweithredol a'r buddion a nodir oddi mewn iddo ar y cyfle cyntaf.

12. Datgomisiynu

Mae'r Cyngor yn nodi y rhagwelir y bydd y gwaith datgomisiynu yn cymryd tua 6 i 12 mis ac y byddai'r Safle'n cael ei adfer yn unol â Chynllun Rheoli Amgylcheddol ar gyfer Datgomisiynu (DEMP) y byddai angen ei gymeradwyo gan y Cyngor o dan ofyniad DCO.

Mae'r Cyngor yn cytuno gyda'r ymgeisydd ei bod yn well cytuno ar y manylion yng nghyswllt datgomisiynu o dan amod.

Mae CSYM yn gofyn am gadarnhad y bydd cyllid priodol ar gael i sicrhau y gellir datgomisiynu'r datblygiad ar ddiwedd y cyfnod gweithredu o 60 mlynedd, ac y caiff hynny ei gyflawni'n unol â'r cynllun a gytunwyd.

Yn y cyswllt hwn, mae'r Cyngor yn ceisio cadarnhad y bydd bond addas ar waith i sicrhau y bydd digon o arian ar gael i ddatgomisiynu'r prosiect yn unol â'r cynllun datgomisiynu.

Mae'r Cyngor hefyd yn ystyried ei bod yn angenrheidiol i sicrhau, os bydd y datblygwr yn rhoi'r gorau i fasnachu, y gellir clirio'r datblygiad o'r safle a chyflawni gwaith adfer priodol.

Mae'r ymagwedd hon yn cyd-fynd â pholisi cynllunio cenedlaethol sy'n cydnabod efallai y bydd awdurdodau cynllunio lleol eisiau i warant ariannol gael ei roi ar waith, yn ogystal ag amod.

Byddai'r Cyngor yn ddiolchgar am gyfle i ymgysylltu ymhellach yng nghyswllt materion sy'n ymwneud â datgomisiynu.

13. Asesu Effeithiau Cronnus

Fel rhan o'r Datganiad Amgylcheddol, bydd angen asesiad priodol a chynhwysfawr o'r Effeithiau Cronnus y bydd angen iddo ystyried effeithiau cronnus y prosiect arfaethedig yng nghyswllt prosiectau gweithredol, rhai sydd wedi'u caniatáu neu y gellir eu rhagweld yn rhesymol yn y dyfodol.

Byddai'r Cyngor yn croesawu'r cyfle i gytuno ar y prosiectau hynny y dylid eu cynnwys mewn asesiad o'r fath gyda'r ymgeisydd.

Mae nifer o gynigion eraill ar gyfer datblygiadau mawr wedi'u cynnig neu wedi cael caniatâd yn ddiweddar ar yr ynys, sy'n cynnwys prosiectau fferm solar a BESS sy'n debyg o ran graddfa, natur a lleoliad i brosiect arfaethedig Maen Hir.

Fel modd o amlygu nifer fechan o brosiectau perthnasol cronnus (posibl) a allai arwain at gyfuniad o effeithiau, dylai'r ymgeisydd gyfeirio at brosiect Fferm Solar Alaw Môn⁹ a chyfleuster BESS Carrog Ganol¹⁰.

Lleolir prosiect arfaethedig Alaw Môn yn agos iawn i'r datblygiad ac mae'r Cyngor yn bryderus ynghylch effeithiau cronnus posibl y ddau brosiect. Mae hyn yn arbennig o berthnasol yng nghyswllt yr effeithiau a ganlyn (ond nid ydynt wedi'u cyfyngu iddynt);

- Effeithiau ar y Dirwedd a rhai Gweledol
- Traffig a Thrafnidiaeth
- Yr Amgylchedd
- Y Gymraeg a'i diwylliant, gan gynnwys Ymdeimlad o Le, twristiaeth ac amaethyddiaeth
- Gwarchod y Cyhoedd gan gynnwys sŵn, dirgryndod, ansawdd yr aer ac effeithiau goleuadau

Ar y cyfle cyntaf, byddai'r Cyngor yn croesawu'r cyfle i wneud sylwadau ar restr o brosiectau y mae angen eu cynnwys yn yr Asesiad o'r Effeithiau Cronnus ar gyfer y prosiect.

14. Ymgysylltu â'r Gymuned

Pe bai'r datblygiad arfaethedig yn cael ei ganiatáu, mae'r Cyngor yn gofyn am gadarnhad y bydd ymgysylltu effeithiol ac ystyrlon yn digwydd trwy gydol y cyfnod adeiladu'n arbennig.

Dylai hyn gynnwys y cyfle i'r gymuned leol a effeithir gan y cyfnod adeiladu gael ei hysbysu'n llawn ynghylch y rhaglen adeiladu, unrhyw ffyrdd a fydd yn cau, danfoniadau i'r safle ac ati.

⁹ Cartref | Fferm Solar Alaw Môn (alaw-mon-solar-farm.co.uk)

¹⁰ Cais Cynllunio: [FPL/2023/218 \(site.com\)](https://www.fpl.gov.uk/2023/218)

Mae'r Cyngor yn argymhell y dylid cyflawni hyn trwy sefydlu Grŵp Cyswllt Cymunedol, defnyddio'r cyfryngau cymdeithasol/gwefan y prosiect, yn ogystal â chael Swyddog Cyswllt Cymunedol y gellir cysylltu ag ef i godi pryderon a'u trafod.

Mae'r Cyngor yn gofyn am ddiogelu ymrwymiad ar gyfer hyn o fewn cynlluniau rheoli'r cais.

Mae'r Cyngor hefyd yn argymhell y dylid sicrhau ymgysylltiad effeithiol a phriodol gyda'r cymunedau hynny y gellir eu heffeithio gan y cynnig trwy gydol y cyfnod cyn cyflwyno cais a'r cyfnod ymgysylltu ar adeg cyflwyno'r cais, ac y dylid rhoi ystyriaeth lawn i'w sylwadau wrth i chi gwblhau eich cynigion.

I gadarnhau unwaith eto, ac fel y cadarnhawyd ers ein cysylltiad cyntaf un, mae cefnogaeth y Cyngor yn ddibynnol ar gael cadarnhad y bydd y datblygiad yn un cynaliadwy sy'n cael cyn lleied â phosibl o effaith ar yr amgylchedd, lle mae'r buddion a'r cyfleoedd economaidd-gymdeithasol yn cael eu sicrhau'n briodol ac y byddir yn manteisio arnynt i'r eithaf. Yn y cyswllt hwn, bydd angen i'r ymgeisydd ddangos y modd y mae'r cynigion yn cydweddu â gweledigaeth y RhYY, Cynllun y Cyngor, polisïau perthnasol y CDLI ar y Cyd, yn ogystal â rhoi ystyriaeth i'r effeithiau cronus tebygol gyda phrosiectau eraill.

Mae'r Cyngor yn cadarnhau hefyd ei fod yn dymuno parhau i ymgysylltu â'r ymgeisydd wrth iddo barhau i ddatblygu manylion y datblygiad arfaethedig.

Yn gywir



Christian Branch

Pennaeth Gwasanaeth – Gwasanaeth Rheoleiddio a Datblygu Economaidd
Head of Service - Regulation and Economic Development Service

Atodiad 1 – Rhestr o holl Bolisiâu Perthnasol y Cynllun Datblygu Lleol ar y Cyd (CDLI ar y Cyd)

PS 1	Yr Iaith Gymraeg a'r Diwylliant Cymreig;
PS 2	Isadeiledd a chyfraniadau gan ddatblygwyr;
ISA 1	Darpariaeth Isadeiledd;
TRA 1	Datblygiadau Rhwydwaith Cludiant;
TRA 4	Rheoli Ardrawiadau Cludiant;
PS 5	Datblygu Cynaliadwy;
PS 6	Lliniaru effeithiau newid hinsawdd ac addasu iddynt;
PCYFF 2	Meini Prawf Datblygu;
PCYFF 3	Dylunio a Siapio Lle;
PCYFF 4	Dylunio a Thirweddu;
PCYFF 6	Cadwraeth Dŵr;
PS 7	Technoleg Adnewyddadwy;
ADN 2	Ynni PV Solar;
ADN 3	Technoleg Ynni Adnewyddadwy a Charbon Isel Arall
PS 13	Darparu cyfle ar gyfer economi ffyniannus;
PS 19	Gwarchod a ble'n briodol gwella'r amgylchedd naturiol;
AMG 3	Gwarchod a gwella nodweddion a rhinweddau sydd yn nodedig i gymeriad y dirwedd leol;
AMG 5	Cadwraeth Bioamrywiaeth Leol;
AMG 6	Gwarchod Safleoedd o Arwyddocâd Rhanbarthol neu Leol;
PS 20	Diogelu a ble'n briodol gwella asedau treftadaeth;
AT 3	Asedau Treftadaeth nad ydynt wedi'u dynodi sydd o arwyddocâd lleol neu ranbarthol;
AT 4	Diogelu safleoedd archaeolegol nad ydynt wedi'u dynodi a'u gosodiad;
CYF1	Gwarchod, dynodi ac amddiffyn tir ac unedau ar gyfer defnydd cyflogaeth;
CYF 5	Defnyddiau amgen o safleoedd cyflogaeth presennol.

From: [REDACTED]
To: [Maen Hir Solar](#)
Subject: Consultation response
Date: 11 December 2023 15:11:32

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Good afternoon

Llaneilian Community Council appreciates the opportunity from the planning Inspectorate to respond to the proposed development and looks forward to making further representations as appropriate and as the process unfolds.

Whilst in principle the council supports solar development as a green and sustainable source of power we are concerned given the overall size of the project, the inexperience of the developer of developing such a large project (5X other developments) and the impact such a large project would have on the local environment and community.

We would therefore request that the following, if not already, be scoped into the developers proposals :

1. The impact on Public Rights of Ways that are currently in use, accessible and identifiable and contrary to the developers ascertions that they are not (desktop studies indicating that the existing PROW network "are no longer used, accessible or identifiable on the ground.")
2. An LVIA (Local Visibility Impact Assessment) site be added to the north East of the project and from an elevated position (from Mynydd Eilian).
3. The impact on local accommodation and infrastructure (given an influx of workers etc.) and the potential impact on Health and other services etc. during Construction and Decommissioning.
4. The financial implications on the immediate area (North East Anglesey) including impacts on tourism, housing and agriculture.
5. The Longer term impacts of connecting to the current national grid infrastructure (upgrading of pylons etc.) and how this may impact any future proposed nuclear development at Wylfa.
6. The management of any proposed community array and proceeds thereof.

Thank you
Carli Evans Thau
Clerk, Llaneilian Community Council

From: [Aelodau Cyngor Cymuned Llanfair Mathafarn Eithaf](#)
To: [Maen Hir Solar](#)
Subject: EN010156 - Prosiect Maen Hir - EIA Scoping Notification and Consultation
Date: 06 December 2023 14:02:54

You don't often get email from aelodauccllanfairme@outlook.com. [Learn why this is important](#)

Dear Sir,

Whilst Llanfair ME Community Council (CCLIME) doesn't directly object to the above development, we would like to kindly invite you to elaborate upon the proposed Prosiect Maen Hir in a council meeting in order to enable us to arrive at an informed decision.

Our next meeting will be at 7pm, 22.01.2024 at Benllech Library.

Kind regards,

Rhian-Mair Jones (chair)

Sent from [Mail](#) for Windows

Tiffany Bate
Development Liaison Officer
UK Land and Property

www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
maenhirsolar@planninginspectorate.gov.uk

11 December 2023

Dear Sir/Madam

APPLICATION BY LIGHTSOURCE bp (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE PROSIECT MAEN HIR (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

I refer to your letter dated 13th November 2023 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure within or in close proximity to the current red line boundary.

NGET has high voltage electricity overhead transmission lines within the scoping area. The overhead lines forms an essential part of the electricity transmission network in England and Wales.

Existing Infrastructure

Overhead Lines

4ZA 400 kV OHL PENTIR - WYLFA 1
 PENTIR - WYLFA 2

New infrastructure

Please refer to the Holistic Network Design (HND) and the National Grid ESO website to view the strategic vision for the UK's ever growing electricity transmission network. <https://www.nationalgrideso.com/future-energy/the-pathway-2030-holistic-network-design/hnd>
NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible.

As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects>. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

I enclose a plan showing the location of NGET's apparatus in the scoping area.

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 3 (2004)”.
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above.
- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

To download a copy of the HSE Guidance HS(G)47, please use the following link:
<http://www.hse.gov.uk/pubns/books/hsg47.htm>

Further Advice

We would request that the potential impact of the proposed scheme on NGET's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGET. Further information relating to this can be obtained by contacting the email address below.

Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully



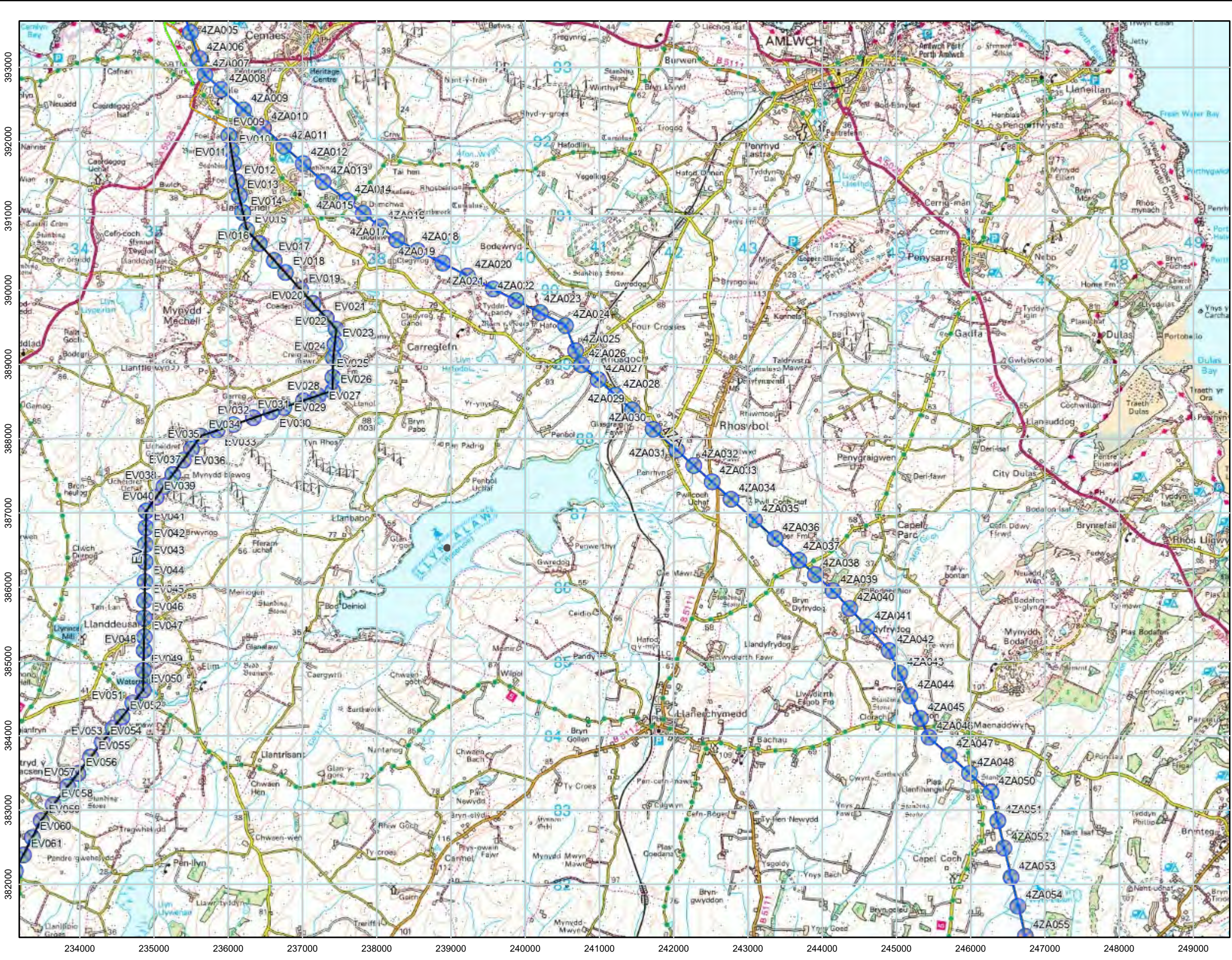
**Tiffany Bate
Development Liaison Officer
Commercial and Customer Connections
Electricity Transmission Property Land and Property**



Legend

- Fibre Cable
 - Commissioned
- Buried Cable
 - Commissioned
- Towers
 - Commissioned
- OHL 132Kv & Below
 - Commissioned
- OHL 400Kv
 - Commissioned

Notes



OS Disclaimer: Background Mapping information has been reproduced from the Ordnance Survey map by permission of Ordnance Survey on behalf of The controller of His Majesty's Stationery Office. © Crown Copyright Ordnance Survey National Grid Electricity Transmission (100024241) & National Gas Transmission (100024886)

Date: 12/11/2023
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 Scale: 1:50,000



NG Disclaimer: National Grid UK Transmission. The asset position information represented on this map is the intellectual property of National Grid PLC (Warwick Technology Park, Warwick, CV346DA) and should not be used without prior authority of National Grid.
 Note: Any sketches on the map are approximate and not captured to any particular level of precision.

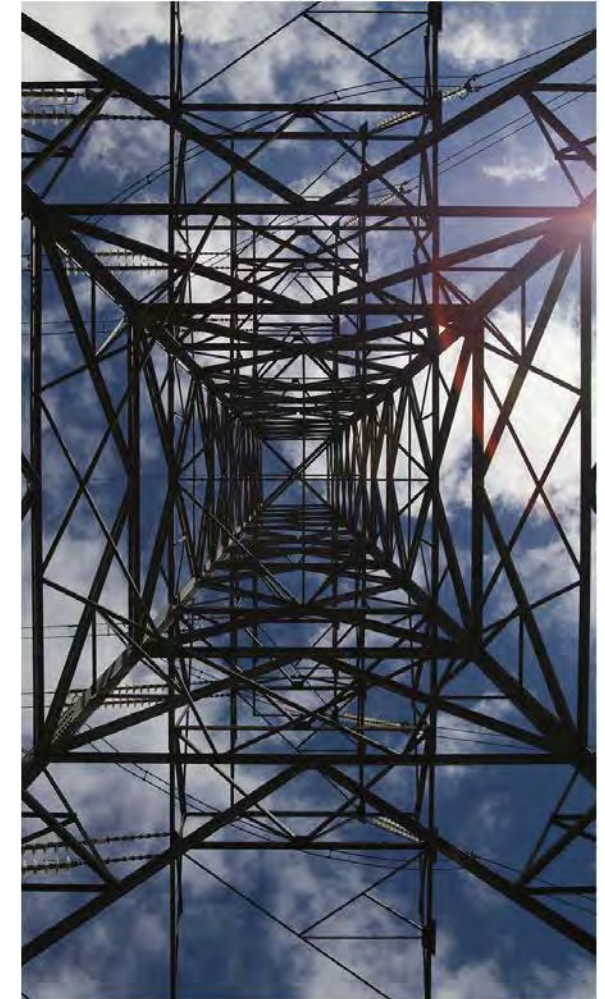
Technical Guidance Note 287

Third-party guidance for working near National Grid Electricity Transmission equipment





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Disclaimer

National Grid Gas Transmission and National Grid Electricity Transmission or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law, nor does it supersede the express terms of any related agreements.



Purpose and scope

The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

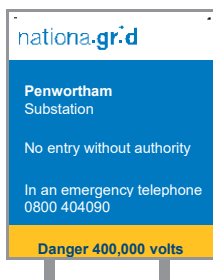
The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National Grid assets that are nearby.

How to identify specific National Grid sites

Substations

The name of the Substation and emergency contact number will be on the site sign.



Overhead Lines

The reference number of the tower and the emergency contact number will be on this type of sign.



Contact National Grid

Plant protection

For routine enquiries regarding planned or scheduled works, contact the Asset Protection team online, by email or phone.

www.lsbud.co.uk

Email: assetprotection@nationalgrid.com

Phone: 0800 001 4282

Emergencies

In the event of occurrences such as a cable strike, coming into contact with an overhead line conductor or identifying any hazards or problems with National Grid's equipment, phone our emergency number 0800 404 090 (option 1).

If you have apparatus within 30m of a National Grid asset, please ensure that the emergency number is included in your site's emergency procedures.

Consider safety

Consider the hazards identified in this document when working near electrical equipment



Part 1

Electricity transmission infrastructure

National Grid owns and maintains the high-voltage electricity transmission network in England and Wales (Scotland has its own networks). It's responsible for balancing supply with demand on a minute-by-minute basis across the network.

Overhead lines

Overhead lines consist of two main parts – pylons (also called towers) and conductors (or wires). Pylons are typically steel lattice structures mounted on concrete foundations. A pylon's design can vary due to factors such as voltage, conductor type and the strength of structure required.

Conductors, which are the 'live' part of the overhead line, hang from pylons on insulators. Conductors come in several different designs depending on the amount of power that is transmitted on the circuit.

In addition to the two main components, some Overhead Line Routes carry a Fibre Optic cable between the towers with an final underground connection to the Substations.

In most cases, National Grid's overhead lines operate at 275kV or 400kV.

Underground cables

Underground cables are a growing feature of National Grid's network. They consist of a conducting core surrounded by layers of insulation and armour. Cables can be laid in the road, across open land or in tunnels. They operate at a range of voltages, up to 400kV.

Substations

Substations are found at points on the network where circuits come together or where a rise or fall in voltage is required. Transmission substations tend to be large facilities containing equipment such as power transformers, circuit breakers, reactors and capacitors. In addition Diesel generators and compressed air systems can be located there.

Part 2

Statutory requirements for working near high-voltage electricity

The legal framework that regulates electrical safety in the UK is *The Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002*. This also details the minimum electrical safety clearances, which are used as a basis for the Energy Networks Association (ENA) TS 43-8. These standards have been agreed by CENELEC (European Committee for Electrotechnical Standardisation) and also form part of the *British Standard BS EN 50341-1:2012 Overhead Electrical Lines exceeding AC 1kV*. All electricity companies are bound by these rules, standards and technical specifications. They are required to uphold them by their operator's licence.

Electrical safety clearances

It is essential that a safe distance is kept between the exposed conductors and people and objects when working near National Grid's electrical assets. A person does not have to touch an exposed conductor to get a life-threatening

electric shock. At the voltages National Grid operates at, it is possible for electricity to jump up to several metres from an exposed conductor and kill or cause serious injury to anyone who is nearby. For this reason, there are several legal requirements and safety standards that must be met.

Any breach of legal safety clearances will be enforced in the courts. This can and has resulted in the removal of an infringement, which is normally at the cost of the developer or whoever caused it to be there. Breaching safety clearances, even temporarily, risks a serious incident that could cause serious injury or death.

National Grid will, on request, advise planning authorities, developers or third parties on any safety clearances and associated issues. We can supply detailed drawings of all our overhead line assets marked up with relevant safe areas.



« [Section continued from previous page](#)

Your Responsibilities - Overhead lines

Work which takes place near overhead power lines carries a significant risk of coming into proximity with the wires. If any person, object or material gets too close to the wires, electricity could 'flashover' and be conducted to earth, causing death or serious injury. You do not need to touch the wires for this to happen. The law requires that work is carried out in close proximity to live overhead power lines only when there is no alternative, and only when the risks are acceptable and can be properly controlled. Statutory clearances exist which must be maintained, as prescribed by the Electricity Safety, Quality and Continuity Regulations 2002.

Under the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999, you are responsible for preparing a suitable and sufficient risk assessment and safe systems of work, to ensure that risks are managed properly and the safety of your workforce and others is maintained. Your risk assessment must consider and manage all of the significant risks and put in place suitable precautions/controls in order to manage the work safely. You are also responsible for ensuring that the precautions identified are properly implemented and stay in place throughout the work.

Work near overhead power lines must always be conducted in accordance with GS6, 'avoiding danger from overhead power lines', and any legislation which is relevant to the work you are completing.

What National Grid will provide

National Grid can supply profile drawings in PDF and CAD format showing tower locations and relevant clearances to assist you in the risk assessment process.

What National Grid will not provide

National Grid will not approve safe systems of work or approve design proposals

Part 3

What National Grid will do for you and your development

Provision of information

National Grid should be notified during the planning stage of any works or developments taking place near our electrical assets, ideally a minimum notification period of 8 weeks to allow National Grid to provide the following services:

Drawings

National Grid will provide relevant drawings of overhead lines or underground cables to make sure the presence and location of our services are known. Once a third party or developer has contacted us, we will supply the drawings for free.

400kV

The maximum nominal voltage of the underground cables in National Grid's network

Risk or impact identification

National Grid can help identify any hazards or risks that the presence of our assets might bring to any works or developments. This includes both the risk to safety from high-voltage electricity and longer-term issues, such as induced currents, noise and maintenance access that may affect the outcome of the development. National Grid will not authorise specific working procedures, but we can provide advice on best practice.





Risks or hazards to be aware of

This section includes a brief description of some of the hazards and issues that a third party or developer might face when working or developing close to our electrical infrastructure.

Land and access

National Grid has land rights in place with landowners and occupiers, which cover our existing overhead lines and underground cable network. These agreements, together with legislation set out under the *Electricity Act 1989*, allow us to access our assets to maintain, repair and renew them. The agreements also lay down restrictions and covenants to protect the integrity of our assets and meet safety regulations. Anyone proposing a development close to our assets should carefully examine these agreements.

Our agreements often affect land both inside and outside the immediate vicinity of an asset. Rights will include the provision of access, along with restrictions that ban the development of land through building, changing levels, planting and other operations. Anyone looking to develop close to our assets must consult with National Grid first.

For further information, contact Asset Protection:

Email: assetprotection@nationalgrid.com
Phone: 0800 001 4282

Electrical clearance from overhead lines

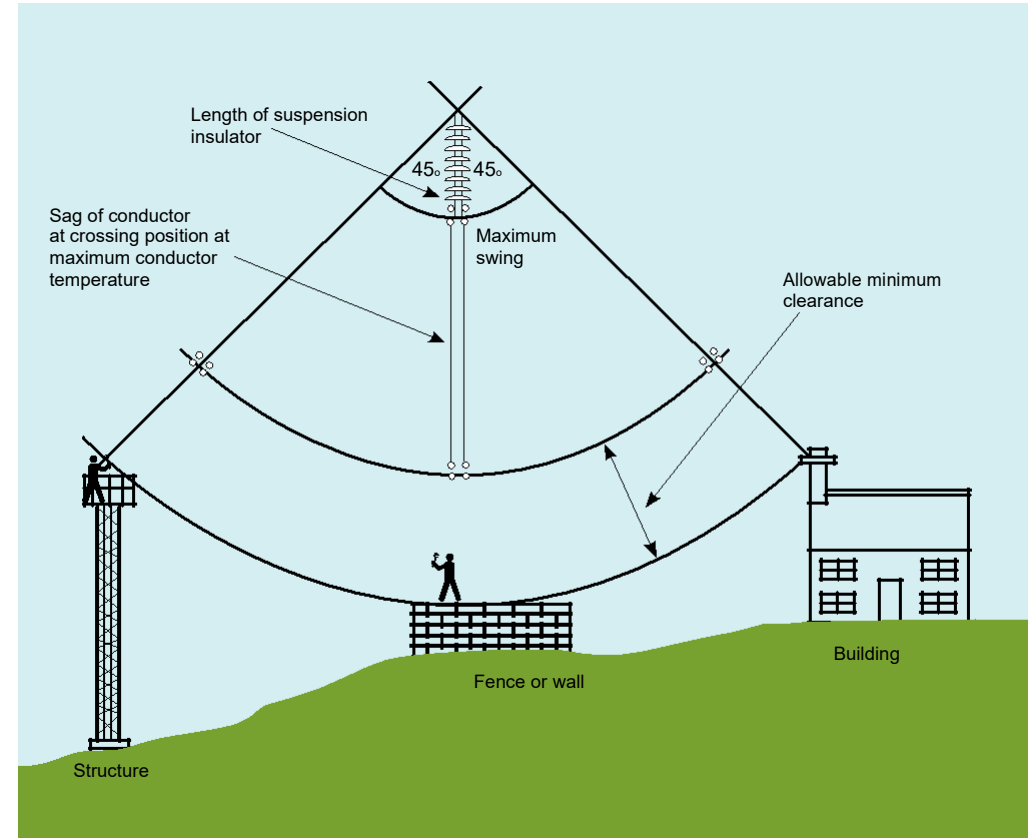
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

As we explained earlier, *Electrical Networks Association TS 43-8* details the legal clearances to our overhead lines. The minimum clearance between the conductors of an overhead line and the ground is 7.3m at maximum sag. The sag is the vertical distance between the wire's highest and lowest point. Certain conditions, such as power flow, wind speed and air temperature can cause conductors to move and allowances should be made for this.

The required clearance from the point where a person can stand to the conductors is 5.3m. To be clear, this means there should be at least 5.3m from where someone could stand on any structure (i.e. mobile and construction equipment) to the conductors. Available clearances will be assessed by National Grid on an individual basis.

National Grid expects third parties to implement a safe system of work whenever they are near Overhead Lines.

Diagram not to scale



There should be at least 5.3m between the conductors and any structure someone could stand on

We recommend that guidance such as *HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines)* is followed, which provides advice on how to avoid danger from all overhead lines, at all voltages. If you are carrying out work near overhead lines you must contact National Grid, who will provide the relevant profile drawings.

7.3m

The required minimum clearance between the conductors of an overhead line, at maximum sag, and the ground

Section continues on next page »



The undergrounding of electricity cables at Ross-on-Wye

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Underground cables Underground cables operating at up to 400kV are a significant part of the National Grid Electricity Transmission network. When your works will involve any ground disturbance it is expected that a safe system of work is put in place and that you follow guidance such as *HSG 47 (Avoiding Danger from Underground Services)*.

You must contact National Grid to find out if there are any underground cables near your proposed works. If there are, we will provide cable profiles and location drawings and, if required, on-site supervision of the works. Cables can be laid under roads or across industrial or agricultural land. They can even be layed in canal towpaths and other areas that you would not expect.

Cables crossing any National Grid high-voltage (HV) cables directly buried in the ground are required to maintain a minimum separation that will be determined by National Grid on a case-by-case basis. National Grid will need to do a rating study on the existing cable to work out if there are any adverse effects on either cable rating. We will only allow a cable to cross such an area once we know the results of the re-rating. As a result, the clearance distance may need to be increased or alternative methods of crossing found.

For other cables and services crossing the path of our HV cables, National Grid will need confirmation that published standards and clearances are met.

Impressed voltage

Any conducting materials installed near high-voltage equipment could be raised to an elevated voltage compared to the local earth, even when there is no direct contact with the high-voltage equipment. These impressed voltages are caused by inductive or capacitive coupling between the high-voltage equipment and nearby conducting materials and can occur at distances of several metres away from the

equipment. Impressed voltages may damage your equipment and could potentially injure people and animals, depending on their severity. Third parties should take impressed voltages into account during the early stages and initial design of any development, ensuring that all structures and equipment are adequately earthed at all times.

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Earth potential rise

Under certain system fault conditions – and during lightning storms – a rise in the earth potential from the base of an overhead line tower or substation is possible. This is a rare phenomenon that occurs when large amounts of electricity enter the earth. This can pose a serious hazard to people or equipment that are close by.

We advise that developments and works are not carried out close to our tower bases, particularly during lightning storms.

Noise

Noise is a by-product of National Grid's operations and is carefully assessed during the planning and construction of any of our equipment. Developers should consider the noise emitted from National Grid's sites or overhead lines when planning any developments, particularly housing. Low-frequency hum from substations can, in some circumstances, be heard up to 1km or more from the site, so it is essential that developers find adequate solutions for this in their design. Further information about likely noise levels can be provided by National Grid.

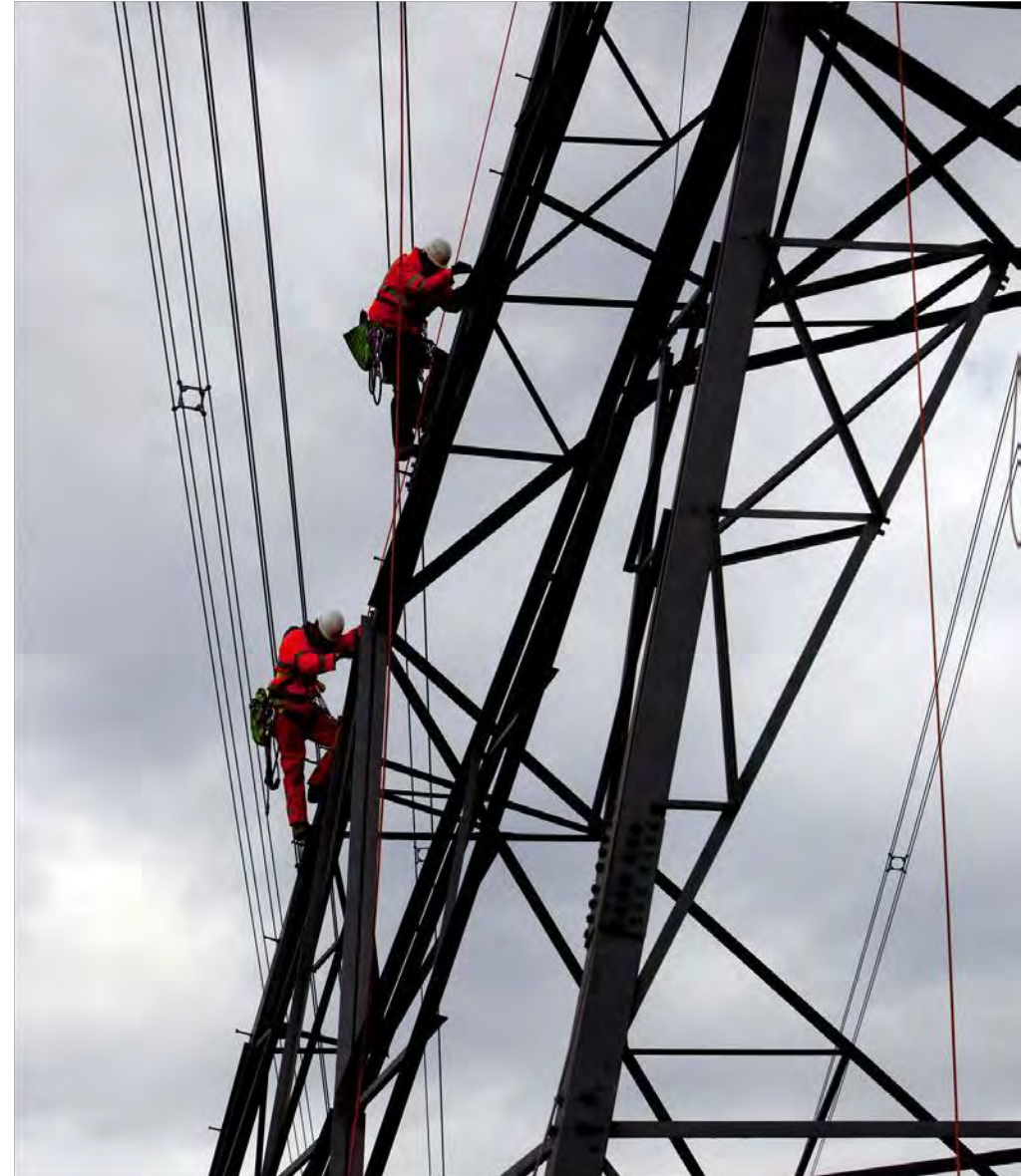
Maintenance access

National Grid needs to have safe access for vehicles around its assets and work that restricts this will not be allowed. In terms of our overhead lines, we wouldn't want to see any excavations made, or permanent structures built, that might affect the foundations of our towers. The size of the foundations around a tower base depends on the type of tower that is built there. If you wish to carry out works within 30m of the tower base, contact National Grid for more information. Our business has to maintain access routes to tower bases with land owners. For that reason, a route wide enough for an HGV must be permanently available. We may need to access our sites, towers, conductors and underground cables at short notice.

30m

If you wish to carry out work within this distance of the tower base, you must contact National Grid for more information

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Fires and firefighting

National Grid does not recommend that any type of flammable material is stored under overhead lines. Developers should be aware that in certain cases the local fire authority will not use water hoses to put out a fire if there are live, high-voltage conductors within 30m of the seat of the fire (as outlined in ENA TS 43-8).

In these situations, National Grid would have to be notified and reconfigure the system – to allow staff to switch out the overhead line – before any firefighting could take place. This could take several hours.

We recommend that any site which has a specific hazard relating to fire or flammable material should include National Grid's emergency contact details (found at the beginning and end of this document) in its fire plan information, so any incidents can be reported.

Developers should also make sure their insurance cover takes into account the challenge of putting out fires near our overhead lines.

Excavations, piling or tunnelling

You must inform National Grid of any works that have the potential to disturb the foundations of our substations or overhead line towers. This will have to be assessed by National Grid engineers before any work begins.

BS ISO 4866:2010 states that a minimum distance of 200m should be maintained when carrying out quarry blasting near our assets. However, this can be reduced with specific site surveys and changes to the maximum instantaneous charge (the amount of explosive detonated at a particular time).

All activities should observe guidance layed out in BS 5228-2:2009.

Microshocks

High-voltage overhead power lines produce an electric field. Any person or object inside this field that isn't earthed picks up an electrical charge. When two conducting objects – one that is grounded and one that isn't – touch, the charge can equalise and cause a small shock, known as a microshock. While they are not harmful, they can be disturbing for the person or animal that suffers the shock.

For these reasons, metal-framed and metal-clad buildings which are close to existing overhead lines should be earthed to minimise the risk of microshocks. Anything that isn't earthed, is conductive and sits close to the lines is likely to pick up a charge. Items such as deer fences, metal palisade fencing, chain-link fences and metal gates underneath overhead lines all need to be earthed.

For further information on microshocks please visit www.emfs.info.



200m

The minimum distance that should be maintained from National Grid assets when quarry blasting



Specific development guidance

Wind farms

National Grid's policy towards wind farm development is closely connected to the *Electricity Networks Association Engineering Recommendation L44 Separation between Wind Turbines and Overhead Lines, Principles of Good Practice*. The advice is based on national guidelines and global research. It may be adjusted to suit specific local applications.

There are two main criteria in the document:

(i) The turbine shall be far enough away to avoid the possibility of toppling onto the overhead line

(ii) The turbine shall be far enough away to avoid damage to the overhead line from downward wake effects, also known as turbulence

The toppling distance is the minimum horizontal distance between the worst-case pivot point of the wind turbine and the conductors hanging in still air. It is the greater of:

- the tip height of the turbine plus 10%
- or, the tip height of the turbine plus the electrical safety distance that applies to the voltage of the overhead line.

To minimise the downward wake effect on an overhead line, the wind turbine should be three times the rotor distance away from the centre of the overhead line.

Wake effects can prematurely age conductors and fittings, significantly reducing the life of the asset. For that reason, careful consideration should be taken if a wind turbine needs to be sited within the above limits. Agreement from National Grid will be required.

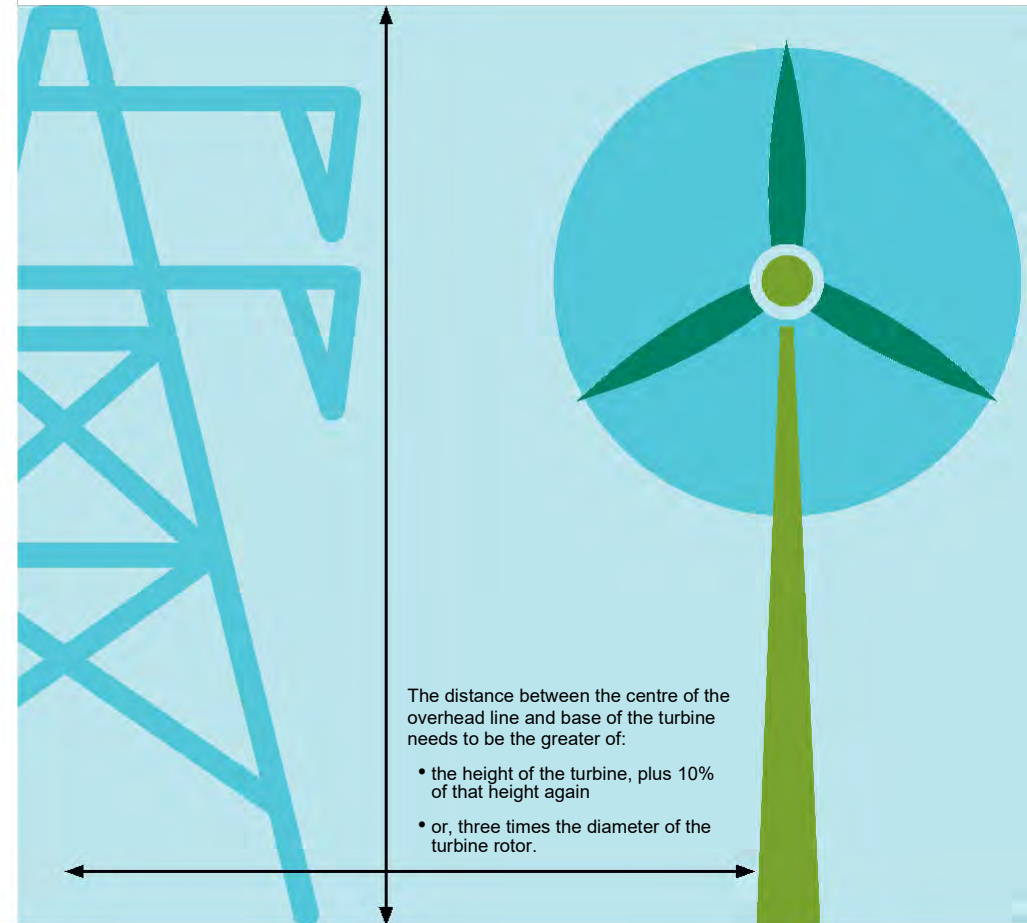
Commercial and housing developments

National Grid has developed a document called *Design guidelines for development near pylons and HVO power lines*, which gives advice to anyone involved in planning or designing large-scale developments that are crossed by, or close to, overhead lines.

The document focuses on existing 275kV and 400kV overhead lines on steel lattice towers, but can equally apply to 132kV and below. The document explains how to design large-scale developments close to high-voltage lines, while respecting clearances and the development's visual and environmental impact.

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Diagram not to scale



Turbines should be far enough away to avoid the possibility of toppling onto the overhead line



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The advice is intended for developers, designers, landowners, local authorities and communities, but is not limited to those organisations.

Overall, developers should be aware of all the hazards and issues relating to the electrical equipment that we have discussed when designing new housing.

As we explored earlier, National Grid's assets have the potential to create noise. This can be low frequency and tonal, which makes it quite noticeable. It is the responsibility of developers to take this into account during the design stage and find an appropriate solution.

Solar farms

While there is limited research and recommendations available, there are several key factors to consider when designing Solar Farms in the vicinity of Overhead Power Lines.

Developers may be looking to build on arable land close to National Grid's assets. In keeping with the safety clearance limits that we outlined earlier for solar panels directly underneath overhead line conductors, the highest point on the solar panels must be no more than 5.3m from the lowest conductors.

This means that the maximum height of any structure will need to be determined to make sure safety clearance limits aren't breached. This could be as low as 2m. National Grid will supply profile drawings to aid the planning of solar farms and determine the maximum height of panels and equipment.

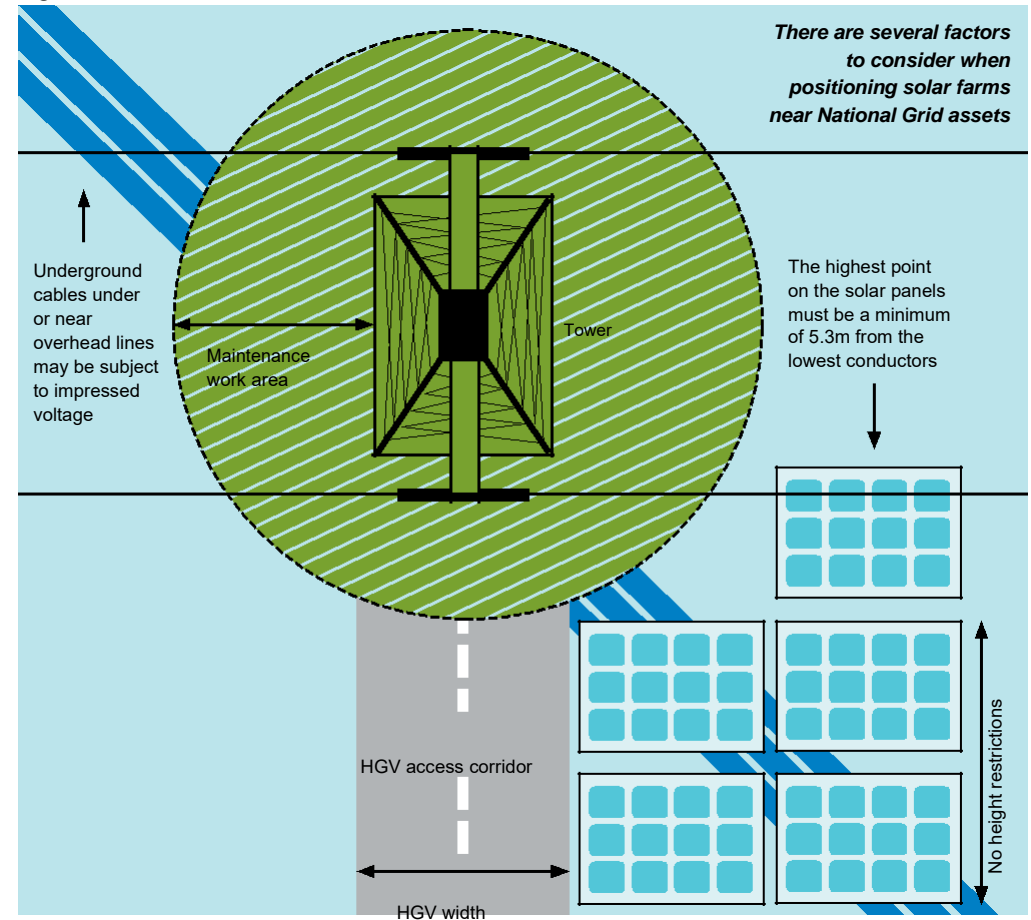
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

There is also a risk of damage during adverse weather conditions, such as lightning storms, and system faults. As all our towers are earthed, a weather event such as lightning can cause a rise in the earth potential around the base of a tower. Solar panel support structures and supply cables should be adequately earthed and bonded together to minimise the effects of this temporary rise in earth potential.

Any metallic fencing that is located under an overhead line will pick up an electrical charge. For this reason, it will need to be adequately earthed to minimise microshocks to the public.

For normal, routine maintenance and in an emergency National Grid requires unrestricted access to its assets. So if a tower is enclosed in a solar farm compound, we will need full access for our vehicles,

Diagram not to scale



Including access through any compound gates. During maintenance – and especially re-conductoring – National Grid would need enough space near our towers for winches and cable drums. If enough space is not available, we would require solar panels to be temporarily removed.



Asset protection agreements

In some cases, where there is a risk that development will impact on National Grid's assets, we will insist on an asset protection agreement being put in place. The cost of this will be the responsibility of the developer or third party.

Contact details

Emergency situations

If you spot a potential hazard on or near an overhead electricity line, do not approach it, even at ground level. Keep as far away as possible and follow the six steps below:

- Warn anyone close by to evacuate the area
- Call our 24-hour electricity emergency number: 0800 404 090 (Option 1)¹
- Give your name and contact phone number
- Explain the nature of the issue or hazard
- Give as much information as possible so we can identify the location – i.e. the name of the town or village, numbers of nearby roads, postcode and (ONLY if it can be observed without putting you or others in danger) the tower number of an adjacent pylon
- Await further contact from a National Grid engineer

¹ It is critically important that you don't use this phone number for any other purpose. If you need to contact National Grid for another reason please use our Contact Centre at www2.nationalgrid.com/contact-us to find the appropriate information or call 0800 0014282.

Routine enquiries

Email:
assetprotection@nationalgrid.com

Call Asset Protection on:
0800 0014282

Opening hours:
Monday to Friday 08:00-16:00

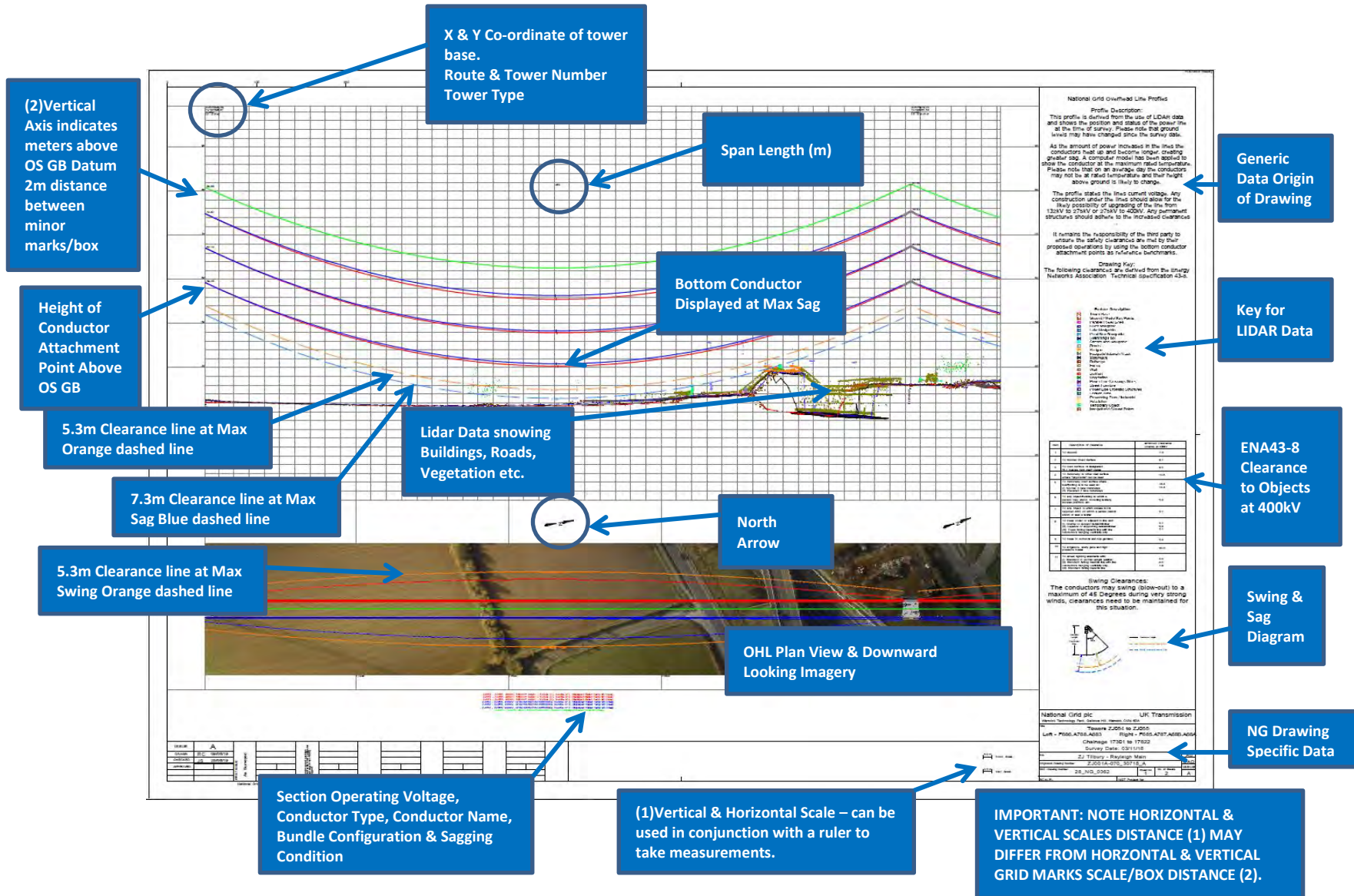
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14 APPENDIX A

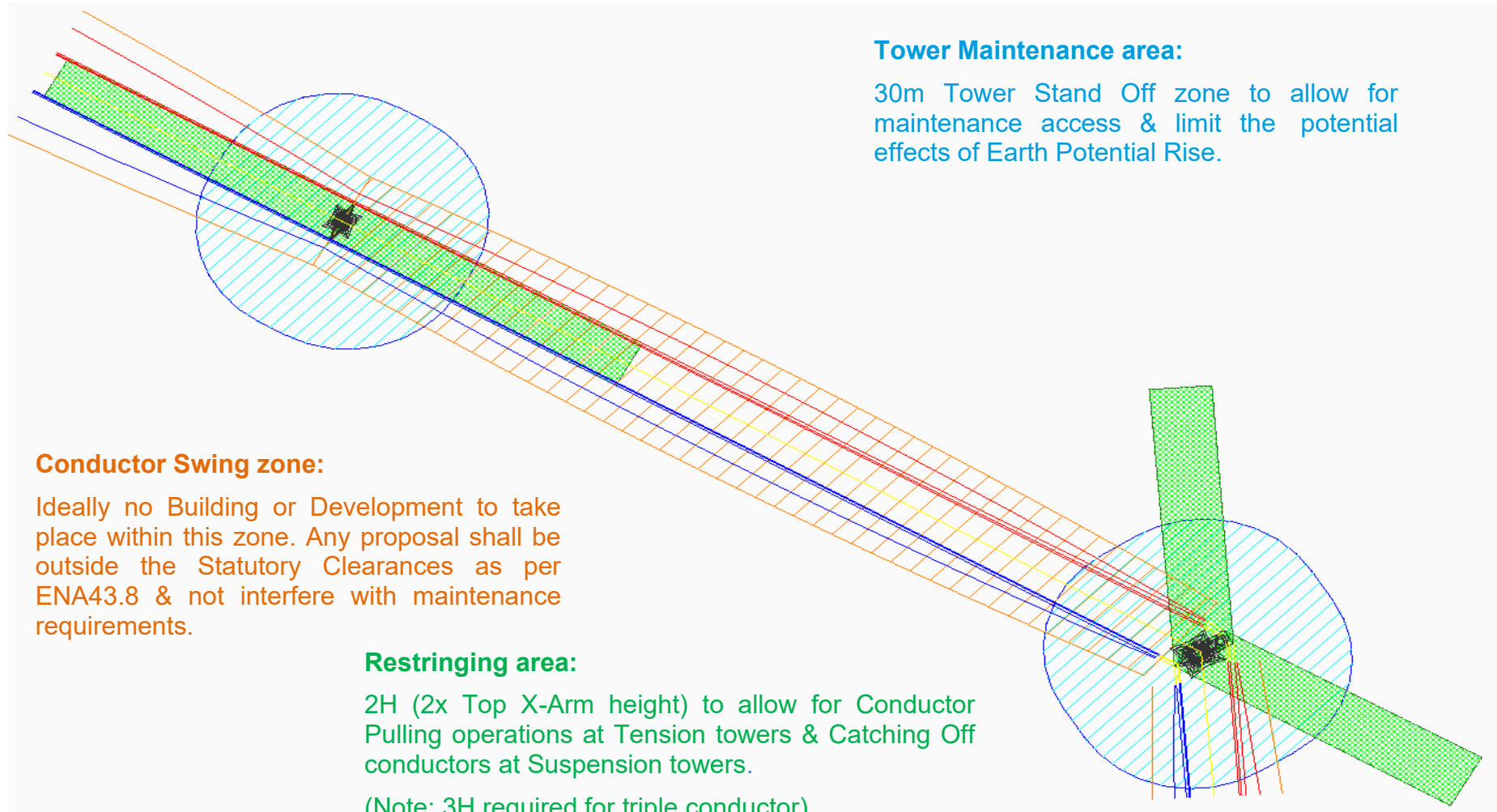


OHL Profile Drawing Guide





OHL Tower Stand Off & Reconducting Area



From: [NATS Safeguarding](#)
To: [Maen Hir Solar](#)
Subject: RE: EN010156 - Prosiect Maen Hir - EIA Scoping Notification and Consultation [SG36468]
Date: 14 November 2023 15:44:24
Attachments: [~WRD0005.jpg](#)
[image007.png](#)
[image008.png](#)
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[image018.png](#)
[image001.png](#)

Our Ref: SG36468

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully



NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Public

From: Maen Hir Solar <maenhirsolar@planninginspectorate.gov.uk>

Sent: 13 November 2023 09:58

Subject: EN010156 - Prosiect Maen Hir - EIA Scoping Notification and Consultation

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam

Please see attached correspondence on the proposed Prosiect Maen Hir.

Please note the deadline for consultation responses is **11 December 2023** and is a statutory requirement that cannot be extended.

Kind regards,

Todd Brumwell



Todd Brumwell | EIA Advisor
The Planning Inspectorate
T 0303 444 5348



@PINSgov



The Planning Inspectorate



planninginspectorate.gov.uk

Ensuring **fairness**, **openness** and **impartiality** across all our services

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DPC:76616c646f72



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The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

08 Rhagfyr / December 2023

Sent by email to: maenhirsolar@planninginspectorate.gov.uk

Dear Sir/Madam,

PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA REGULATIONS) – REGULATION 10

EIA SCOPING OPINION CONSULTATION REGARDING PROSIECT MAEN HIR, ANGLESEY

Thank you for consulting Natural Resources Wales (NRW) on the above EIA Scoping request, which received on 13/11/2023.

As described on the PINS website, Prosiect Maen Hir (the proposed development), comprises of an “*Electricity Generating Station including solar photovoltaic panels with a generating capacity in excess of 350MW, a Battery Energy Storage System (BESS), a new substation, and other Associated Development*”.

We have reviewed the information provided in the EIA Scoping Request Report (Lightsource bp, dated November 2023). We provide comments in Annex I below which include those matters within NRW’s remit that we consider will need to be taken into account for the EIA and included in the resulting Environmental Statement (ES).

In order to aid review, where possible, our comments are provided under the chapter headings from the Scoping Report. We also provide a table of contents on page 3 of this letter to aid navigation.

Please note that the comments provided herein are made without prejudice to any further advice we may need to give, or decisions we may need to take, in the light of new information that we will need to take into account.

The Scoping Report refers to current engagement with NRW on some EIA topics. However, we have had limited engagement to date with the Applicant and have not provided any detailed advice. NRW does offer a discretionary pre-application advice service should the Applicant require early advice. We also recommend that the Applicant consults on draft application documents (including the draft ES and supporting documents), ideally at the PEIR stage, allowing sufficient time to address any comments, prior to DCO submission.

The Applicant should be advised that, in addition to development consent, it is their responsibility to ensure that they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

Please do not hesitate to contact us if you require further information or clarification on any of the above.

Yours faithfully,

Bryn Griffiths

Uwch Gynghorydd - Cynllunio Datblygu / Senior Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales

[CONTINUED]

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ANNEX I

1. LANDSCAPE AND VISUAL (CHAPTER 7.2) & GLINT AND GLARE (CHAPTER 7.12)

1.1. Isle of Anglesey Area of Outstanding Natural Beauty (AONB)

- 1.1.1. Our landscape planning advice relates to the landscape character and visual amenity of the Isle of Anglesey AONB and the statutory purpose of the designation to conserve and enhance its natural beauty.
- 1.1.2. Our advice in relation to the Isle of Anglesey AONB is based on the following chapters of the Scoping Report:
- Section 3: Project Description.
 - Section 7.2: Landscape and Visual.
 - Section 7.12: Glint and Glare.
 - Figures 7-1 to 7-13.
- 1.1.3. The main component of the proposal is photovoltaic arrays which would have a max height of 3.3m. The BESS containers would be up to 3.5m in height. The tallest infrastructure would be within the proposed substation compound (maximum height 15m).
- 1.1.4. The proposals relate to three main separate development sites referred to in the Scoping Report as:
- Maen Hir North.
 - Maen Hir Central.
 - Maen Hir South.
- *Landscape and Visual Impact Assessment (LVIA) Scope*
- 1.1.5. The Isle of Anglesey AONB predominantly relates to Anglesey's coast and hinterland but extends further inland at locations such as Mynydd Bodafon. The location of the three Maen Hir sites relative to the boundary of the AONB is shown on Scoping Report Figure 7-6 (Landscape Designations). At the nearest point:
- Maen Hir North is approximately 1km south of the AONB.
 - Maen Hir Central is approximately 4.3km west of the AONB.
 - Maen Hir South is approximately 1.2km south-west of the AONB.
- 1.1.6. The site includes land within the setting of the AONB. The main impact pathway is visibility of the development from locations within the AONB and its setting, potentially leading to changes in perceptual characteristics and qualities of the AONB and its setting.
- 1.1.7. A preliminary Zone of Theoretical Visibility (ZTV) analysis has been prepared for the proposed photovoltaic development within each site and the proposed substation and BESS. The ZTVs are included in the Scoping Report (Figures 7-7 to 7-11), and all indicate theoretical visibility of development from within the AONB. The preliminary ZTV analysis does not account for above ground features such as vegetation, which would limit visibility compared with the results of the ZTV.
- 1.1.8. Based on the results of the ZTV, a 3km study area has been identified for the LVIA. We are satisfied with the extent of the study area and note it includes:
- Coastal areas within the AONB east of Cemaes Bay to Bull Bay / Porth Llechog which has a High visual and sensory evaluation in LANDMAP.
 - Elevated land within the AONB around and including Mynydd Bodafon which has a High visual and sensory evaluation in LANDMAP.
 - Elevated land with views towards the site and AONB at Parys Mountain.

- 1.1.9. Policies of the AONB Management Plan state all development proposals within and up to 2km adjacent to the AONB will be rigorously assessed to minimise inappropriate development which might damage the special qualities and features of the AONB (Policy CCC 3.1) and that within this 2km area, developments will be expected to adopt the highest standard of design, materials and landscaping in order to conserve and enhance the special qualities and features of the AONB and to be respectful of the local context (Policy CCC 3.2). As set out above, the site includes land which lies within 2km of the AONB boundary.
- 1.1.10. The Scoping Report states that:
- *'effects on the expansive views and the visual relationship between the AONB and the surrounding undesignated landscape will be scoped in to the LVIA.'* (Paragraph 7.2.59).
 - *'However, the LVIA will not assess and will scope out any effects on the other special qualities identified within Appendix 1 of the Management Plan which are not considered relevant.'* (Paragraph 7.2.59)
- 1.1.11. We agree that effects on the AONB should be scoped into the LVIA. However, we do not agree with the proposed LVIA scope being narrowed to one special quality 'Expansive Views'. We advise that the special quality of 'Peace and Tranquillity' may also be relevant. The contribution of views to a sense of peace and tranquillity is recognised in AONB Objective 4, which seeks to safeguard unspoilt panoramic views, dark skies and tranquillity. Further evidence on visual tranquillity is provided in NRW Report 569 Tranquillity and Place and the accompanying online StoryMap for visually tranquil places ([Tranquillity and Place \(arcgis.com\)](https://arcgis.com)). These resources should be considered as part of the LVIA.
- 1.1.12. The extent of lighting proposed is not yet confirmed, but a Lighting Impact Assessment is proposed to be scoped out (paragraph 7.2.127). We advise that tranquillity is also important at night and the dark skies of Anglesey are increasingly recognised as being of high importance. The Isle of Anglesey County Council (IACC) are currently working towards securing Dark Skies status for Anglesey. In this context, the potential impacts on dark skies should be considered within the LVIA. NRW Report 514 Tranquillity and Place – Dark Skies and online StoryBoard for the dark skies mapping undertaken in 2021 should be considered as part of the LVIA: [Wales Dark Skies \(arcgis.com\)](https://arcgis.com).
- 1.1.13. Within a designated landscape, it is unrealistic to expect a particular location to exhibit all or even most of the area's special qualities. Whilst the number of special qualities present or affected is a relevant consideration, it should not be the sole or principal determinant of the overall effects on the designated landscape. Attention must also be given to aspects which contribute to the area's natural beauty, including its scenic quality and sense of place. Available evidence, including the Anglesey Landscape Strategy 2011, LANDMAP Aspect Areas, and the AONB Management Plan, should be used alongside site survey to form a detailed understanding of the natural beauty and special qualities of the AONB, and the impacts on these.
- 1.1.14. Two assessment viewpoints located within the AONB are proposed to be used in the LVIA. These are located at:
- Graig Wen, Porth Cynfor / Hell's Mouth (Viewpoint 1). This is located within LCA 4 North West Coast and LANDMAP Visual and Sensory (V&S) Aspect Area YNSMNVS011.
 - Elevated viewpoint to south-west of Mynydd Bodafon (Viewpoint 17). This is located within LCA 8 Dulas Bay Hinterland and LANDMAP V&S Aspect Area YNSMNVS004.
- 1.1.15. The Scoping Report proposes to scope out LCA 4 but scope in LCA 8 and the V&S Aspect Areas above. This is in recognition that visual changes occurring outside of a landscape unit can affect perceptual aspects of the landscape unit. If potential impacts are identified

within the V&S Aspect Area YNSMNV011, the LVIA should report on how these may alter any relevant characteristics of LCA 4, if at all.

1.1.16. We advise the preliminary ZTVs indicate theoretical visibility on the public rights of way (PRoW) network within V&S Aspect Area YNSMNV011, closer to the proposed development than Viewpoint 1 e.g. landscape southeast of Porth Wen. Similarly, the ZTVs indicate theoretical visibility at locations on the northern slopes of Mynydd Bodafon which may have a different focus to Viewpoint 17. We recommend checking these locations as part of the detailed LVIA site survey work. If they would illustrate different types of impact, including cumulative impacts to Viewpoints 1 and 17, then they should be included as separate viewpoints. We note the potential for combined visual effects are identified at Mynydd Bodafon (Paragraph 7.2.124).

1.1.17. A photomontage would be prepared from Viewpoint 17 but not Viewpoint 1. In general, the number of photomontages proposed (5 in total) is disproportionately low for a scheme of this scale and nature, which relates to 3 large and geographically separate sites.

- *Guidance*

1.1.18. The following guidance, not referenced in the Scoping Report, should be referred to when designing/refining the proposals and undertaking the LVIA:

- Design Commission for Wales, Designing for Renewable Energy in Wales, November 2023 which includes principles for designing large scale solar installations.
- Scoping Report paragraph 7.2.57 refers to the previous Isle of Anglesey AONB Management Plan 2015-2020. The current Plan is the Area of Outstanding Natural Beauty Management Plan 2023-2028.
- NRW Guidance Note 46 Using LANDMAP in Landscape and Visual Impact Assessments.
- NRW Report 569 Tranquillity and Place and the accompanying online StoryMap for visually tranquil places ([Tranquillity and Place \(arcgis.com\)](https://arcgis.com))
- NRW Report 514 Tranquillity and Place – Dark Skies and online dark skies mapping undertaken in 2021. [Wales Dark Skies \(arcgis.com\)](https://arcgis.com)

- *LVIA Assessment Methodology*

1.1.19. We are satisfied with the general methodological approach proposed for the LVIA, which references key guidance for landscape and visual impact assessment (page 98 onwards), including:

- Guidelines for Landscape and Visual Impact Assessment, 3rd Edition, Landscape Institute with the Institute of Environmental Management and Assessment, 2013
- Landscape Institute, Technical Guidance Note 06/19, Visual Representation of Development Proposals

1.1.20. We advise the following methodological issues may result in some effects being underestimated:

- Paragraph 7.2.87 states moderate effects are not significant. We advise that moderate effects can potentially be significant, particularly in the context of an AONB. We advise the LVIA methodology should be updated to reflect this.
- Table 7-8 sets out different categories of landscape value, and the implications of these categories on overall sensitivity is set out in Tables 7-9 and 7-10. We advise that an approach which only affords the highest value to landscapes which are nationally or internationally designated is not appropriate and is not supported by best practice guidance in TGN 02-21: Assessing Landscape Value Outside National Designations.
- Because of the methodology above, a highly valued landscape receptor such as a Special Landscape Area (SLA) (falling under the LVIA 'local/district' value

category), with a medium susceptibility to change, would only have a 'medium' overall sensitivity. This means that a medium magnitude of change to said receptor would typically only result in a moderate and not significant effect (under LVIA definition) (Image 7-2). We would consider this to be an underestimation. Typically, an SLA receptor with medium susceptibility would have a medium/high overall sensitivity and a medium magnitude of change to this receptor would potentially result in a moderate/major and significant effect. We advise the LVIA methodology should be updated to address this issue.

- *Scoping Report Figures*

1.1.21. We offer the following advice regarding the LVIA figures:

- The AONB boundary is not shown on the ZTV figures. We request that it be added to all relevant figures at the PEIR stage.
- A topographic / shaded relief map for the entire study area would be helpful to illustrate this aspect of the landscape context. This should also identify the AONB boundary.
- Figure 7-12 (Cumulative ZTV and LVIA Viewpoints) is difficult to understand due to the way areas of combined visibility have been shaded. We consider it preferable to show areas of combined visibility as a distinct colour and to avoid shading the site.
- Figure 7-4 (LANDMAP) is difficult to read due to the way in which the aspect areas have been shaded and the different opacities between the study area and land outside the study area.

1.1.22. For the PEIR we request hard copies of the visualisations and ZTVs printed to scale.

- *Glint and Glare*

-

1.1.23. The ES will include a glint and glare assessment. A 1km study area for ground-based receptors will be used and this will scope out receptors within the AONB. Although receptors at Mynydd Bodafon would potentially overlook MH South, it is expected that due to the arrangement of PV arrays facing south (albeit potentially tracking from east to west), that the potential for glint and glare effects at Mynydd Bodafon is small, if not avoidable.

2. ECOLOGY AND BIODIVERSITY (CHAPTER 7.3)

2.1. National Site Network – General

2.1.1. As explained below in sections 2.2 and 2.3, we consider the proposal has the potential to have adverse effects on Special Protection Areas, Special Areas of Conservation and Ramsar sites.

2.1.2. As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), it will be for the Secretary of State (SoS), before deciding to give consent for a project which is likely to have a significant effect on a SAC/SPA/Ramsar site, either alone or in combination with other plans or projects, to make an appropriate assessment of the implications of the project for that affected site(s) in view of its conservation objectives.

2.1.3. We note that the Applicant will be preparing a Habitats Regulations Assessment (HRA) Report (i.e. Shadow HRA) to provide the relevant information for the SoS to undertake its HRA.

2.2. National Site Network – Special Protection Areas (SPAs)

- General

- 2.2.1. Overall, we agree with the general approach to assessing impacts. However, we consider that several key ornithological receptors have so far been omitted for consideration, these are Greenland white-fronted goose (“GwfG”) and Chough.
- 2.2.2. Table 7-18 sets out the scope of ecological surveys (birds). However, there is no reference to species specific surveys, for example field parcel transect for chough and vantage point surveys for GwfG which we believe are required. We understand the Applicant has already commenced two years of breeding and wintering bird surveys, however we consider the scope of these surveys need to be expanded as explained in the comments below.
- 2.2.3. We are also unclear and have concerns as to how the 10km zone of influence was determined, especially in regard to the presence of highly mobile species within the application site. For example, paragraph 7.3.13 lists chough among the species identified as part of the desk top survey. Indeed 7.3.14 lists chough as a species that has been recorded from “*the Site and adjacent areas...*”. However, impacts on the Glannau Ynys Gybi/Holy Island SPA, which lies approximately 11.5km from the proposed site and is classified for its breeding and wintering chough, was not considered to be in the zone of influence of this project. NRW disagrees with the current definition of the zone of influence and advise the scope should be increased to include the Glannau Ynys Gybi/Holy Island SPA (see also below).
- 2.2.4. Paragraph 7.3.51 states that the HRA Report will consider impact pathways on designated sites up to 10km away. However, we advise additional information/assessment of in combination/cumulative impacts, which should include all plans and projects, including those that are currently in planning and those already consented, that have the potential to adversely impact breeding or wintering birds, such as GwfG and chough.
- 2.2.5. Paragraph 7.3.14 states “*However, survey results to date indicate that no species reach numbers considered to be significant (Ref 7-16) within the Site as a whole*”. We advise clarity is provided on the term ‘significant’ and whether this is framed in relation to the categories listed in paragraph 7.3.40 or the conservation status (Birds of Conservation Concern) or extinction risk (International Union for Conservation of Nature (IUCN)) of a given species.
- 2.2.6. Paragraph 7.3.22 states “*Where construction cannot avoid nesting birds, then nesting bird checks will need to be undertaken by a suitably experienced ecologist prior to construction (where this occurs within the breeding season) to ensure there is no species mortality*”. We advise supporting information should also be provided on mitigation measures to be undertaken to minimise disturbance.

- Greenland white-fronted goose (GwfG)

- 2.2.7. The population of GwfG is small and their world range limited. The global wintering range of the population falls entirely within Britain and Ireland. In Wales wintering GwfG are restricted to two key sites, the Dyfi Estuary SPA and Anglesey, and number less than 40 birds. We advise the ES and HRA Report should include an assessment of the potential for habitats on Anglesey to provide functional linkage with the Dyfi SPA population.
- 2.2.8. The species is endemic, in winter, to Britain and Ireland. Sites used during the winter are highly traditional between years and have a long history of occupancy with GwfG utilising both semi-natural habitat as well as agriculturally managed grassland for roosting and foraging. Traditionally, the race showed specialist adaptations to feeding in peatlands and other wetlands throughout its range. However, in recent decades GwfG have changed to

feeding in agricultural landscapes of varying degrees of farming intensity (Stroud *et al.* 2012).

- 2.2.9. The Scoping Report appears to have scoped out any impact pathways, particularly disturbance and displacement, to over-wintering GwfG. The reasons for this omission is unclear.
- 2.2.10. A study undertaken by the ECHOES project (Effect of climate change on bird habitats around the Irish Sea) sought to address how climate change will impact coastal bird habitats of the Irish Sea, with particular reference to two wetland species that are in rapid decline – the curlew and GwfG.
- 2.2.11. As part of the ECHOES project several GwfG were GPS satellite tagged on Anglesey to determine movements during the winter. Through locational data we are aware that over-wintering GwfG use fields adjacent to Llyn Alaw. We therefore advise that these data sets are considered within the EIA. We advise consultation with the lead officer for the ECHOES project¹ who may have information that is relevant to the assessment, and in particular the GPS tagging data for GwfG. This is consistent with advice we have provided to similar schemes on Anglesey, particularly in the vicinity of the Llyn Alaw.
- 2.2.12. GwfG demonstrate unusual social structuring with lasting family relationships, for example flocks typically comprise extended families of several generations. They show strong fidelity to sites and make use of limited wintering home-ranges over many years. All these factors suggest a high ‘cultural’ element of learnt behaviour in the selection and use of sites. Typically, sites used by a flock of GwfG comprise one or more nocturnal roost sites, one or more separate feeding areas, and areas used for refuge in the event of disturbance during the day. Access to the ECHOES location data for GwfG on Anglesey and/or GwfG specific surveys are required to rule out the possibility that GwfG are not disturbed and/or displaced by the proposed development from feeding and winter roost sites.

- *Chough*

- 2.2.13. There are seven SPAs classified for choughs in Wales (including the Glannau Ynys Gybi/Holy Island SPA), six coastal and one inland, covering over 7,500ha. Choughs are listed as a qualifying breeding feature for all seven Welsh SPAs, and as a qualifying wintering feature for six coastal SPAs. The Welsh Chough SPA suite represents 35% of the Welsh population and 30% the UK population.
- 2.2.14. Due to the location of the development and the potential for functional linkage or connectivity between Glannau Aberdaron and Ynys Enlli/ Aberdaron Coast and Bardsey Island, Glannau Ynys Gybi/ Holy Island Coast and Mynydd Cilan, Trwyn y Wylfa ac Ynysoedd Sant Tudwal SPAs, adverse effects on the integrity of these SPAs cannot be ruled out.
- 2.2.15. We note there is no explicit inference to functional linkage/connectivity in the Scoping Report. We advise that a working definition of functional linkage is established. For example, the definition provided below by David Tyldesley Associates may be used (Report to Natural England): “*Such an area of land or sea is therefore ‘linked’ to the site in question because it provides a (potentially important) role in maintaining or restoring a protected population at favourable conservation status*”.

¹ <https://echoesproj.eu/contact/>

- 2.2.16. Once a working definition of functional linkage is established, we advise that the Applicant considers three tests to determine if there is functional linkage of chough between Glannau Ynys Gybi/Holy Island Coast SPA and the proposed development area plus zone of influence, these are:
- 1) Is there evidence to suggest that during the breeding season breeding adults from the Glannau Ynys Gybi/Holy Island Coast SPA forage within habitats at the proposed development?
 - 2) Are the maintenance of conservation objectives for the Glannau Ynys Gybi/Holy Island Coast SPA dependent on chough recruitment from the proposed development area. If so, would this loss of immigration represent a significant adverse impact to the favourable condition of breeding chough at Glannau Ynys Gybi/Holy Island Coast SPA.
 - 3) Do the habitats at the proposed development represent a significant contribution to the requirements of wintering chough from Glannau Ynys Gybi/Holy Island Coast SPA? If so, would the loss of these habitats at the proposed development represent a significant adverse impact to the favourable condition of chough at Glannau Ynys Gybi/Holy Island Coast SPA.
- 2.2.17. Table 7-17 infers statutory designated sites (with mobile qualifying criteria) located up to 10km from the Site/Scoping Study Area (SACs, SPAs, Ramsar sites) are scoped in, with anything beyond 10km scoped out. The Scoping report does not address the functionality tests for breeding or wintering chough between the proposed development and the Glannau Ynys Gybi/Holy Island SPA.
- 2.2.18. As the three connectivity tests (see above) have not been addressed we do not agree that sufficient evidence has been presented to enable the scoping out of Glannau Ynys Gybi/Holy Island Coast SPA.
- 2.2.19. The Applicant should also be made aware of the third UK SPA review where JNCC undertook a review of all SPAs to further develop guidance and principles to assist the application of UK SPA selection criteria. This included an assessment of the adequacy of the SPA network for breeding and non-breeding populations of chough (see JNCC 2016a and 2016b for chough appendices within Stroud *et al.*, 2016). The UK SPA network for chough was considered to be insufficient for non-breeding chough for numbers, range and ecology. We are currently in the process of assessing the insufficiency of Chough SPAs in Wales.
- 2.2.20. Due to the point raised above about the potential for functional linkage across the chough SPA suite of Glannau Aberdaron and Ynys Enlli/ Aberdaron Coast and Bardsey Island, Glannau Ynys Gybi/ Holy Island Coast and Mynydd Cilan, Trwyn y Wylfa ac Ynysoedd Sant Tudwal SPAs, we advise there is a need for wintering chough specific surveys, that follows established methods recommended by the RSPB. These surveys may provide further information on the numbers and distribution of winter foraging chough within the proposed development and associated zone of influence and the use foraging chough make of the habitats. Methods would probably comprise the following:
- i. Fortnightly walked transects following identified routes.
 - ii. Recording numbers of chough, their location and behaviour.
 - iii. Recording details of any colour-ringed chough.
 - iv. Recording the habitat variables in all fields in the study area.
- 2.2.21. We advise that a minimum of one year of chough specific surveys is undertaken, with the possibility to extend for an additional year, dependent on survey findings.
- 2.2.22. We further advise that the Welsh Chough Project are consulted, as they hold a database of chough records, including inland records for Anglesey.

2.3. National Site Network – Special Areas of Conservation (SAC) & Ramsar sites

- *Corsydd Môn / Anglesey Fens SAC and Corsydd Môn a Llŷn / Anglesey and Llyn Fens Ramsar site*

2.3.1. Table 7-16 lists the SACs and Ramsar sites within 10km of the Site and Scoping Study Area. We note that Corsydd Môn / Anglesey Fens SAC and Corsydd Môn a Llŷn / Anglesey and Llyn Fens Ramsar sites are both located 0.41km from the Site boundary, and 0.33km from the Scoping Study Area. However, it is unclear from Table 7-17 whether the SAC/Ramsar sites are to be Scoped into the assessment.

2.3.2. We note that the detailed layout of the scheme is not yet available, but it appears that the red line boundary in the eastern end of the Maen Hir South site may be within the catchment of the SAC/Ramsar site. Based on the information available, we advise that these sites are Scoped in and that the ES and HRA Report should clearly demonstrate whether the works would have indirect effects on the hydrology or water quality within the SAC/Ramsar catchment. Any necessary mitigation should also be identified to demonstrate that the proposal would not have adverse effects on the integrity of the SAC/Ramsar sites.

- *Marine SACs*

2.3.3. Table 7-16 also lists other SACs within 10km of the Site, including North Anglesey Marine / Gogledd Môn Forol SAC, located 1.7km to the north. Although there is an impact pathway between the development site and marine SACs, we consider that robust pollution measures would be sufficient to avoid adverse effects on the integrity of marine SACs. A detailed outline CEMP should be submitted as part of the DCO application to demonstrate that appropriate measures will be put in place. We refer you to our comments below (section 6.2, Water Quality) for further advice.

2.4. Sites of Special Scientific Interest (SSSI)

2.4.1. Table 7-16 lists the SSSIs within 5km of the Site and Scoping study area. In sections 2.2 and 2.3 above we identify additional SPAs, SAC and Ramsar sites that should be scoped in to the assessment, many of which are also notified as SSSIs. Provided the issues identified for the specific SPA/SAC/Ramsar discussed in sections 2.3 and 2.4 above are addressed, we are satisfied that concerns relating to SSSIs will similarly be addressed.

2.4.2. Table 7-17 states that Statutory (national) designated sites within 2 km of the Site/Scoping Study Area will be scoped in. However, the scope appears to be limited to Llyn Alaw SSSI and other SSSIs with mobile features that may be affected. Table 7-16 identifies the following SSSIs at various distances: Llyn Hafodol a Cors Clegyrog SSSI (0.38km from the site), Cors Erddreiniog SSSI (0.41km), and Salbri SSSI (0.43km). As highlighted above for the Corsydd Môn/Anglesey Fens SAC, based on the information available, it is unclear whether the development could have indirect effects on these SSSIs.

2.4.3. The ES should clearly demonstrate whether the works would have indirect effects on the hydrology or water quality within the SSSI catchment. Any necessary mitigation should also be identified to demonstrate that the proposal would not damage the SSSIs.

- *Llyn Alaw SSSI*

2.4.4. Table 7-16 identifies the development site to be immediately adjacent Llyn Alaw SSSI. In fact, the Maen Hir Central parcel surrounds the north-eastern part of Llyn Alaw SSSI, which has the following special features:

- The largest moderately nutrient-rich lake in Anglesey
- Several species of over-wintering wildfowl; notably whooper swan, shoveler and teal, the population of each closely reaching 1% of the British population.

- Breeding tufted duck
- The uncommon slender spike-rush which occurs on the reservoir margins.

2.4.5. The proposed works have the potential to have indirect impacts on Llyn Alaw SSSI through alterations to groundwater/surface water flows and water quality. NRW advise that sufficient hydrological/hydrogeological information, along with detailed pollution prevention measures should be provided in the ES as part of the DCO submission to demonstrate whether the proposal will damage the SSSI lake interest. We refer you to our comments below (section 6.2, Water Quality) for further advice on water quality.

2.4.6. In relation to ornithological features of the SSSI, Table 7-18 sets out the scope of ecological surveys (birds). However, there is no reference to species specific surveys, for example vantage point surveys for whooper swan, which is a feature of the SSSI. In addition, there is limited/negligible information on survey methods applied for wintering and passage birds. It is unclear what survey methods were applied. Surveys should also include a component of crepuscular/nocturnal survey to determine the full use of the fields in proximity to the Llyn Alaw SSSI, particularly roosting whooper swan. Though we welcome the two years of breeding and wintering bird surveys, we were not consulted on survey design for both breeding and wintering birds and we have not had sight of any interim reports. We advise the Applicant may wish to consult us using our discretionary advice service should they require advice to inform survey methodology, as well as any interim reports, to ensure that the information collected will demonstrate whether SSSI features will be affected.

2.4.7. We note that detailed information on the layout of scheme is not currently available, however, based on the information available, we have concerns that the proposal may damage the SSSI interests.

- *Geological interest*

2.4.8. Table 7-16 identifies a number of geological SSSIs within 5km, the closest of which is Maen Gwyn (0.76km). We are satisfied that the proposal is unlikely to damage this SSSI or any other SSSI solely with geological interest.

2.4.9. We do note that Cae Mawr Regionally Important Geological Site (RIGS) is within the Maen Hir Central site (at the southern extremity). RIGS data are available on DataMap Wales. We recommend the Applicant consults GeoMon Geopark for further advice on RIGS sites.

- *Ancient Woodland*

2.4.10. Parts of the application site are within an Ancient Woodland site. We refer the Applicant to our website ([Advice to planning authorities considering proposals affecting ancient woodland](#)) for further information.

2.5. Protected Species

- *General*

2.5.1. Paragraph 7.3.14 of the Scoping report states that the following European Protected Species (protected under the Conservation of Habitats and Species Regulations 2017) are considered likely to be present at the site: Bats, otters and great crested newts. It also states that nationally fully protected species (protected under the Wildlife and Countryside Act 1981) likely to be present at the site includes: red squirrels, water voles and barn owl.

2.5.2. We advise that the site is subject to assessment to determine the likelihood of protected species being present and that targeted species surveys are undertaken for all species scoped in. These should comply with current best practice guidelines and in the event that

the surveys deviate, or there are good reasons for deviation, that full justification for this is included within the ES.

- 2.5.3. Should protected species be found during the surveys, information must be provided identifying the species-specific impacts in the short, medium and long-term together with any mitigation and compensation measures proposed to offset the impacts identified. We advise that the ES sets out how the long-term site security of any mitigation or compensation will be assured, including management and monitoring information and long-term financial, tenure and management responsibility. Where the potential for significant impacts on protected species is identified, we advise that a Conservation Plan is prepared for the relevant species and included as an Annex to the ES.
- 2.5.4. Where an European Protected Species is identified a licence may be required from NRW under Part V of the Conservation of Habitats and Regulations 2017 for which the EIA must include consideration of the requirements for a licence and set out how the works will satisfy the requirements as set out in the Conservation of Habitats and Species Regulations 2017. The development authorised must not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range. The licensing requirements are also translated into planning policy through Planning Policy Wales (PPW), section 6.4.22 and 6.4.23 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009).
- 2.5.5. We advise that the ES considers significance (alone and in combination) and conservation status. In respect of conservation status, we advise consideration to be given to current conservation status (CCS) and demonstration of no likely detriment to maintenance of favourable conservation status (FCS) during construction, operation and decommissioning phases of the scheme.
- 2.5.6. Evaluation of the impacts of the scheme should include: direct and indirect; secondary; cumulative; short, medium and long-term; permanent and temporary; positive and negative, and construction, operation and decommissioning phase and long-term site security impacts on the nature conservation resource, landscape and public access.
- 2.5.7. We have the following species-specific comments with respect to GCNs and barn owls.
- *Great crested newts (GCNs)*
- 2.5.8. The survey proposals for GCNs focus on Habitat Suitability Index (HSI) and eDNA sampling. HSI surveys will focus on likely breeding aquatic habitats. However, ponds in the immediate vicinity of likely breeding ponds may function primarily as aquatic foraging or sheltering habitats. Consequently, eDNA surveys will therefore need to consider potential pond functionality. In addition to eDNA surveys, we advise that traditional survey techniques are likely to be required for pond clusters that support the species. We advise the Applicant consults us on the proposed survey methodologies for further advice.
- *Barn Owl*
- 2.5.9. Barn owl is protected as a Schedule 1 species under the Wildlife and Countryside Act 1981. The EIA Scoping appears to have scoped out any impact pathways, particularly disturbance and displacement, to breeding barn owl. The reasons for this omission are unclear. We advise an appropriate survey for breeding and foraging barn owl is undertaken based on the risk of displacement / disturbance to nesting birds.

2.6. Fisheries (Freshwater/Migratory)

- 2.6.1. The Applicant should be aware that no in river works on watercourses/rivers should be carried out after the 17th October until the following 15th May. This closed period is to protect

the spawning adults, spawn and juvenile life stages of Sea Trout (*Salmo trutta*), Brown Trout (*Salmo trutta* subsp. *fario*), Eel (*Anguilla anguilla*), River Lamprey (*Lampetra fluviatilis*) which are particularly vulnerable to disturbances at this time. This should be clearly set out in the ES and outline Construction Environmental Management Plan (oCEMP) (see paragraph 6.2.1 below).

- 2.6.2. The Applicant will need to carry out fish rescues prior to any in river works where fish species have been identified as being present, contacting a suitable contractor/consultant to carry out this type of work on any works affected watercourses. The results/data gathered from these fish rescues should be sent to NRW's Anglesey and North Gwynedd Environment Team for recording. This should be set out in the oCEMP
- 2.6.3. We can provide further advice with respect to fish once consulted on more details on the proposed layout and construction methods.

2.7. Invasive Non-Native Species (INNS)

- 2.7.1. Paragraph 7.3.13 states that twelve species of INNS have been found on site. The proposed works have the potential to cause both the introduction and spread of INNS which may impact on designated nature conservation sites and/or protected species. We therefore advise that the provisions of the ES include a Biosecurity Risk Assessment, which will be implemented during all phases of the proposal including construction and operation of the development. We anticipate that the Biosecurity Risk Assessment will detail:
- measures that will be undertaken to control and eradicate INNS within the area of works;
 - measures or actions that aim to prevent INNS being introduced to the site for the duration of construction phase of the scheme.

3. AIR QUALITY (CHAPTER 7.6)

- 3.1.1. Our advice in terms of air quality relates to potential effects on designated nature conservation sites.
- 3.1.2. In relation to dust, we agree that the Corsydd Môn / Anglesey Fens SAC and Cors Erddreiniog SSSI (410m away) and Llyn Hafodol and Cors Clegyrrog SSSIs (380m away) can be scoped out of the ES. However, Llyn Alaw SSSI is located immediately adjacent to the site and therefore falls within the 50m screening distance. We consider Llyn Alaw SSSI may be sensitive to smothering or nutrient enrichment by dust. We advise scoping in dust assessment to ensure Llyn Alaw SSSI will not be damaged by dust impacts during construction.
- 3.1.3. In terms of construction traffic, we agree with the scoping in of an assessment on construction road traffic and a quantitative/ qualitative assessment made based on IAQM guidance thresholds.

4. SOILS AND AGRICULTURE (CHAPTER 7.9)

4.1. Soils and Peat

- 4.1.1. Special consideration should be given to peat soils which should be mapped and protected where possible. We can give further advice once in receipt of more detailed information on the proposed layout of the development, and the proposed construction works, in relation to the mapped peat.

5. GROUND CONDITIONS (CHAPTER 7.8)

5.1. Land Contamination

- 5.1.1. Paragraphs 7.8.35 states that *“the assessment will assess the likely significant environmental effects of the Project on the geology, soils and groundwater within the Scoping Study Area and in the local area”*. 7.8.36 also states that the *“assessment involves consideration in terms of the naturally occurring geological conditions and any man-made deposits, known as Made Ground”*. We agree that this should be scoped in and can provide further advice when in receipt of more detailed information regarding the assessments proposed.

6. WATER RESOURCES (CHAPTER 7.10)

6.1. Flood Risk

- 6.1.1. With regards to flood risk, we note the contents of paragraphs 7.10.6 and 7.10.7 in the Scoping report. Please be aware that NRW have not updated the Development Advice Maps since early 2020. As confirmed in the [letter](#) from Welsh Government dated 15 December 2021, the Flood Map for Planning (FMfP) represents better and more up-to-date information on areas at flood risk than the DAM. The FMfP also accounts for the impacts of climate change.
- 6.1.2. Having reviewed the DAM and the FMfP associated with the boundaries of the developments associated with Maen Hir North/Central/South there does appear to be slight changes in flood extent between the maps. In some areas the DAM has a greater extent, however our advice would be to use the best and most recent information to screen flood risk, being the FMfP. Please be aware that NRW will comment on flood risk based on flood zones 3/2 as per the FMfP for Rivers and Sea (rather than risk associated with Surface Water and Small Watercourses).
- 6.1.3. We would advise that in line with the current TAN15 (2004), developments should be directed towards suitable land which is not at flood risk. If any element of the proposed development is to be sited within zone 3/2 for rivers then the base of the PV modules will need to be elevated above the design flood level; namely the 1% Annual exceedance probability flood event with a suitable allowance for climate change on flows. We note and agree with the reference to the current climate change allowances made in paragraph 5.1.1 (footnote 27) of the Scoping Report. Any buildings (substations/control buildings etc) or essential infrastructure associated with the development proposed in zone 3/2 will need to be supported/informed by site specific hydraulic modelling to ensure that the flood risk and impacts are fully understood. There should be no increase in flood risk to others due to the development; this would include any flood displacement or impact on flood conveyance.
- 6.1.4. Any works in, over, under or within 8m of a designated main river may be subject to the requirements of Schedule 25 (Flood Risk Activity Permits) of the Environmental Permitting Regulations 2016. Structures such as bridges would require hydraulic modelling. It is also good flood risk management and an environmental benefit to provide an undeveloped buffer zone (wildlife corridors) along the banks of watercourses regardless of their status.

6.2. Water Quality

- Construction phase

- 6.2.1. Paragraph 3.4.3 states that “an outline Construction Environmental Management Plan (oCEMP) will be prepared to support the DCO Application. The oCEMP will set out the mitigation measures identified through the EIA process to be employed during the construction phase”. We agree that an outline CEMP should be submitted as part of the DCO application and should include detailed measures to demonstrate that pollution risks will be appropriately managed. We raise specific points below (6.2.2 – 6.2.15) which should be fully assessed in the ES and reflected in the mitigation measures included in the oCEMP.
- 6.2.2. We note the location of the proposed development and that Maen Hir Central is on the edge of Llyn Alaw and that Maen Hir South is on the tributaries that drain to Cefni reservoir. We also note that Maen Hir North drains into the Wygyr which flows in to Cemaes and its bathing water. Bathing waters and Drinking Water Protected Area are protected areas under the Water Framework Directive (WFD) Regulations 2017 (we refer you to our comments below in section 6.4 in relation to WFD).
- 6.2.3. Paragraph 7.10.23 highlights that Llyn Alaw is a drinking water protection area. However, we advise that Cefni reservoir should also be added to this list, although we note the Maen Hir South site is a little upstream of the reservoir. The use of both Alaw and Cefni as the main drinking water sources for Anglesey needs to be highlighted in any assessment. We recommend that the Applicant liaises with Dŵr Cymru Welsh Water (DCWW) on the development of their proposals.
- 6.2.4. Robust pollution prevention measures need to be in place to prevent pollution of all watercourses, but where there are pathways to drinking water sources then the Applicant (including contractors undertaking works) need to be particularly aware of the risks and the measures being put in place to be sufficiently robust and precautionary. A robust and rapid process of notification to NRW and DCWW in the event of any incident also needs to be in place.
- 6.2.5. With regard to paragraph 7.10.19 (Groundwater) of the Scoping Report, although the project area is not on a Principal or Secondary A bedrock aquifer, there are some Secondary A superficial (unconsolidated) aquifers; we are also aware of several private groundwater supplies in the area. The monitoring and protection of all private water supplies within the project area must be included in the scope. The Applicant should also note that all groundwater drinking water protected areas are a protected area under the WFD Regulations 2017.
- 6.2.6. The oCEMP should make reference to Guidance for Pollution Prevention 5 (GPP5) and include appropriate measures to be followed from GPP5. All relevant GPPs (available on the Netregs website) which are to be followed should be clearly specified in the oCEMP.
- 6.2.7. More frequent extreme rainfall events due to climate change can quickly erode soils, especially during construction which can lead to water pollution and ecological damage. We are aware of past problems on solar farms where the infrastructure has been installed during wet winter weather. As a result there were a lot of muddy tracks caused by machinery and consequently muddy run-off to watercourses. To reduce the risk of pollution, wherever possible, the construction of the site should take place when the ground is not saturated, which in north west Wales is likely to be the end of March to the end of September.
- 6.2.8. To assist in reducing muddy run-off, we advise the use of steel tracking to minimise damage to the land by tracks and install silt fencing to prevent run-off. The silt fencing and watercourses adjoining the site will need to be checked daily – especially in wet weather to ensure that there is no pollution arising from the site.

- 6.2.9. There will be a number of machines on site which will need refuelling. All such fuel, as well as any chemical used, should be kept in locked and bunded stores. Spill kits should be available on site and staff trained to use them.
- 6.2.10. Any soil that needs to be moved and stockpiled should be stored more than 10 metres from any watercourses and silt fencing erected between the stockpile and any watercourse.
- 6.2.11. Groundwater can be especially vulnerable during the construction phase of the project, therefore, special consideration should be given to protecting groundwater. We refer the Applicant to [Groundwater protection - GOV.UK \(www.gov.uk\)](http://www.gov.uk) and other pollution prevention guidance, including: [Guidance for Pollution Prevention \(GPP\) documents](#).
- 6.2.12. We note the comments in 7.9.33 and 7.9.34 of the Scoping Report about installing cables into trenches. The Applicant should be aware that trenches will fill with rainwater and groundwater in wet weather if left open overnight etc. If dewatering is needed in these trenches then care needs to be taken to pump this somewhere where it can soak into the ground and not discharge into a watercourse.
- 6.2.13. In view of the scale of the development, environmental clerk(s) of works should be on site during construction. 24-hour contact details will need to be provided to NRW which can be accessed in the event of any incident.
- 6.2.14. Construction may generate waste that will need to be appropriately managed. We advise that the oCEMP should identify how all waste produced on site is to be disposed of safely and in accordance with Section 34 of the Environmental Protection Act 1990 and Natural Resources Wales relevant guidance on waste management. For any waste generated on site (e.g. plastic and cardboard etc that cannot be recycled due to being soiled etc) they should be collected into covered / sealed skips. There is a Duty of Care responsibility on the site owners and contractors to ensure that wastes are appropriately stored and do not escape – especially in windy conditions.
- 6.2.15. Should there be any soil, or stones or such material that need disposing off site, they must have either an exemption, or a waste permit in place to do so.

- *Operational phase*

- 6.2.16. There is no mention of an Operational Management Plan. The operational phase has the potential to cause pollution as a result of the maintenance of the PV arrays as well as any faults in the BESS or project substation. We provide further advice below on guidance and/or measures that should be considered and set out in an outline Operational Management Plan (or equivalent plan) which should be submitted as part of the DCO application.
- 6.2.17. In relation to the BESS, we note that there is a section on Major incidents and disasters in the documents supplied (section 7.15). We refer the Applicant to the Netregs website, in particular GPP21 and GPP22 that refer to incident planning and spills.
- 6.2.18. Detailed information should be provided on the location of the BESS in order to understand which receptors (e.g. Llyn Alaw, Llyn Cefni or other watercourses) that may be affected in the event of an incident.
- 6.2.19. Detailed information should also be provided on the types of BESS (i.e. which chemicals are involved) that will be used and the measures that will be put in place if they are damaged or overheat. The ES should clearly set out the emergency plan, and details of secondary containment that the BESS will have. Details of any alarm system for any incident should also be provided. In the event of a fire, and the need to use water, the ES should set out

the precautions that will be in place to contain any fire water produced and how fire water will be disposed of without causing pollution.

- 6.2.20. Although comments 6.2.16 – 6.2.19 relate to the BESS, we advise that emergency plan pollution prevention measures (i.e. in the event of any incident such as a fire) should also be set out for the substation and associated infrastructure.
- 6.2.21. It is unclear whether herbicides or pesticides will be required during the operation of the solar farm. Given the proximity to Llyn Alaw and Llyn Cefni, we would recommend that no herbicides or pesticides are used as their current use on land are already a concern at these reservoirs.
- 6.2.22. All materials proposed to be used in the operation of the project should be tested and certified as to their long-term safety in the environment. Materials should not release harmful substances (including PFAS, microplastics, toxic metals etc.) to the environment due to degradation (or any other mechanism) due to exposure to sunlight, air, water, bacterial and other organisms. Materials that may release such substances can contaminate the air, water, soil, flora and fauna. No material should be assumed safe if not supported by evidence.

- *Foul drainage*

- 6.2.23. Paragraph 7.10.47 of the Scoping Report states that *“there will be no foul infrastructure associated with the Project and, therefore, there is not expected to be an increase in quantity post development”*. 7.10.48 goes on to state that *“the Project will generate foul water during construction which has the potential to adversely affect available treatment capacity. However, this affect will be temporary and of a minor magnitude and is therefore not expected to be significant. Welsh Water should be consulted prior to the start of construction works if a connection point for foul water from welfare facilities is to be required during the temporary construction phase”*.
- 6.2.24. We advise that the ES clearly sets out how the Applicant proposes to deal with foul sewage during both the construction (e.g. from the construction logistics hub) and operational phases (for the four members of staff that will be permanently on site).
- 6.2.25. We refer the Applicant to Welsh Government Circular 008/2018 on the use of private sewerage in new developments, and specifically paragraphs 2.3-2.5, which stress the first presumption must be to provide a system of foul drainage discharging into a public sewer. If a private drainage solution can be justified, the Applicant will need to apply for an Environmental Permit from us.
- 6.2.26. We therefore advise that foul drainage is scoped in and details provided as part of the DCO application.

6.3. Water Resources (Water Quantity)

- *Hydrological/hydrogeological modelling*

- 6.3.1. The establishment of baseline (pre-project) hydrology/hydrogeology and water quality requires monitoring. This should be followed by the establishment of a monitoring program, for the construction, operational, and decommissioning phases of the project. This is to help assure that the project does not have any adverse effects on the water environment, and if any are detected, to allow mitigating actions to be quickly implemented.
- 6.3.2. Hydrological modelling should be scoped in to provide an initial assessment of the potential changes to the hydrological system due to project construction and operation. Section 7.10.42 states that: *“Research detailed within the ‘Hydrological Response of Solar Farms’,*

'Biodiversity Guidance for Solar Development' and 'Technical Information note TIN101: Solar Parks: Maximising Environmental Benefits' (Ref 7-77) suggests that the development of solar panels over a grassy field does not have a significant effect on the volume of runoff, the peak discharge, nor the time to peak. It is therefore anticipated that the Project will not have a significant effect in relation to increasing flood risk on-site and to the downstream catchment". However, hydrological modelling of the project area before and after the completion of the project is advisable at the planning and design phase.

- *Potable water*

- 6.3.3. Section 7.10.50 scopes out Potable water. 7.10.46 states: *"The Project will involve the use and consumption of potable water during construction. This has the potential to affect water resource availability within the local region. However, this effect will be temporary and of a minor magnitude and is therefore not expected to be significant.* To remove any doubt and avoid potential water supply issues, especially during drier periods, this should be scoped in.
- 6.3.4. It must be ensured that main rivers, ditches, drains or streams are not diverted away from their existing drainage pathways, in particular those draining into Llyn Alaw and Llyn Cefni, potable water sources for DCWW. If there is potential for effects on the potable water yield and Llyn Alaw or Llyn Cefni then that must be fully assessed in the ES.
- 6.3.5. OS maps show areas of Springs (Spr) and wells (w), for example at the eastern flank of Llyn Alaw, which may provide sources of water for rural landowners. Care needs to be taken to ensure that water is not diverted away from these sources of supply (we refer to our comments above (section 6.2) for our advice in terms of Water Quality). IACC may have information on the location of these water supply wells.
- 6.3.6. With regards to Tables 7-42 and 7-43, the water bodies are large in comparison to the site locations. Once information on the proposed detailed layout is available, we advise clarification is provided as to whether a more detailed analysis of local water quantity issues will be undertaken.

6.4. Water Framework Directive (WFD)

- *General comments*

- 6.4.1. The development involves works in the vicinity of a number of watercourses and has the potential to affect the status of a number of groundwater, river, transitional and coastal water bodies. As explained below, we advise that robust mitigation measures are required.
- 6.4.2. Paragraph 1.2.28 states that the assessment will consider the provisions of the Water Environment (WFD) (England and Wales) Regulations 2017. However, it does not state whether this will be as part of the ES or as a standalone WFD Compliance Assessment. We advise that a standalone WFD Compliance Assessment be provided in support of any DCO application which clearly demonstrates that the development will not prevent any water bodies from meeting their objectives or cause deterioration of any water bodies. If results of a WFD Compliance Assessment concludes that the project may cause deterioration or prevent attainment of objectives, then a derogation under Article 4(7)/Regulation 19 is required. We can provide further advice to the Applicant on the scope of the WFD Compliance Assessment.
- 6.4.3. The Scoping Report refers to the WFD water bodies that are within the study area. There are works that may affect non-reportable water bodies. However, the WFD Regulations 2017 still apply. Where a new activity or project is planned then an assessment should still consider measures to protect, and where possible, improve them to the extent needed to

achieve the objectives for water bodies to which they are directly or indirectly connected. This should be clearly set out in the WFD Compliance Assessment.

- 6.4.4. Paragraph 7.10.22 lists the WFD river catchments, however we advise that the specific water bodies to be assessed are specified e.g. river, lake, transitional and coastal water bodies. We refer the Applicant to [Water Watch Wales](#).
- 6.4.5. Table 7-42 considers Receptor Sensitivity as High where a water body has a WFD classification of High or Good, and as Moderate or Low where the WFD classification is Moderate or Poor/Bad respectively. We disagree and advise that any deterioration as defined in 6.4.2 above would count as deterioration. Similarly, Table 7-43 considers Magnitude of Effect as High where the “change *would equate to a downgrading of a WFD Quality classification by two classes*”. Similarly, we disagree as any deterioration in class would not be compliant with the WFD Regulations 2017.
- 6.4.6. Paragraph 7.10.28 of the Scoping Report states that there “*are no groundwater dependent terrestrial ecosystems located within the Water Resources Study Area*”. However, we refer you to our comments above (comment 2.3.2) in relation to our advice on Corsydd Môn SAC / Cors Erddreiniog SSSI which are ground water dependent terrestrial ecosystems.
- 6.4.7. Paragraph 7.10.25 of the Scoping Report states that the “*Water Resources Study Area is located within the Ynys Môn Secondary Groundwater Drinking Water Protected Area which has been assessed to be ‘not at risk’*”. This statement is unclear and we advise the Applicant clarifies what is meant by ‘not at risk’.

- *Water Quality*

- 6.4.8. As highlighted above (section 6.2), the construction and operational phases of the development has the potential to result in pollution incidents, including run-off of sediments or chemical leakages. Such incidents may impact on the downstream water bodies. The oCEMP will need to clearly demonstrate how the risk of pollution will be appropriately managed in order to inform the conclusions of the WFD Compliance Assessment.

- *Fluvial geomorphology*

- 6.4.9. Section 3.4 of the Scoping Report states that construction may involve the “*upgrade or construction of crossing points (bridges/culverts) over drainage ditches and below ground utility infrastructure*”. We advise that the use of culverts is avoided. For access purposes, bridges should be used wherever possible in order to maintain the natural flow, allow natural channel migration and to maintain natural sediment and gravel movement downstream. Changes in hydromorphology (the physical characteristics and processes of the river) has the potential to cause deterioration in the WFD quality elements.
- 6.4.10. We advise that the Applicant follows the principles in NRW’s Position Statement on ‘Culverting of main rivers’². Whilst this is for main rivers, the same principles should apply to any watercourse. The Applicant should also liaise with IACC in relation to ordinary watercourses.

² Report reference: PS 021, Natural Resources Wales

- 6.4.11. Where culverting is proposed, the Applicant should fully demonstrate why it is both necessary and the only reasonable alternative. We refer the Applicant to our 'NRW National Culverts Study'³ and, in particular, Appendix A of that report.
- 6.4.12. It is unclear whether power cables installed as part of the project will cross any watercourses. We would advise that horizontal direct drilling or other forms of undergrounding are used wherever possible. Detailed information on the proposed methodology, along with evidence to demonstrate that there will not be impacts on fluvial geomorphology, should be provided within the ES and WFD Compliance Assessment.

7. NRW REGULATION AND PERMITTING SERVICES

- Environmental Permitting response

- 7.1.1. The Applicant may need a number of Environmental Permits and/or Licences from NRW. We advise that the Applicant contacts NRW for further advice on those that are likely to be needed: [Natural Resources Wales / Pre application advice for environmental permits](#)

----- END -----

³ Ashdown, S; Nelson, J; Smith, V & Thomas, R 2022. NRW National Culverts Study. NRW Evidence Reports Report No: 642, 102 pp, Natural Resources Wales.

From: [REDACTED]
To: [Maen Hir Solar](#)
Subject: EN010156-000006- land in Anglesey
Date: 30 November 2023 12:44:35
Attachments: [image006.png](#)

OFFICIAL



Network Rail
1st Floor
Bristol Temple Point
Bristol
BS1 6NL

My Ref: P/TP23/246

Your Ref: EN010156-000006

Date: 30 November 2023

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

APPLICATION NO: EN010156-000006

PROPOSAL: Environmental Impact Assessment (EIA) Scoping Request for a solar generating station with a capacity of over 350 megawatts (MW) alternating current (AC), with energy storage (Prosiect Maen Hir)

LOCATION: land in Anglesey

Dear Sir/Madam,

Thank you for your email dated **13 November 2023** together with the opportunity to comment on this proposal.

At this stage NR have no objections in principle to the scheme and reserve detailed comments for when the full application is presented to NR.

The EIA Scoping should consider Transport and Access and the use of any level crossings associated with the development. A transport assessment should be submitted alongside the application and should reference and assess any level crossings construction traffic may use. The assessment should also make suggestions for appropriate mitigation to address any adverse impacts caused by the works.

The proposed development should also consider the following NR standards for drainage. Soakaways / attenuation ponds / septic tanks etc, as a means of storm/surface water disposal must not be constructed near/within 5 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property/infrastructure. Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains. Network Rail's drainage system(s) are not to be compromised by any work(s). Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property / infrastructure. Ground levels – if altered,

to be such that water flows away from the railway. Drainage does not show up on Buried service checks. Detailed drainage plans should be submitted as part of the application for NR's review.

Yours Sincerely,

Grace Lewis

Town Planning Technician Wales and Western
Network Rail

Temple Point, Redcliffe Way, Bristol, BS1 6NL

E [REDACTED]

www.networkrail.co.uk/property

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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, Waterloo General Office, London, SE1 8SW.

From: [ONR Land Use Planning](#)
To: [Maen Hir Solar](#)
Subject: ONR Land Use Planning - Application EN010156
Date: 08 December 2023 15:27:03
Attachments: [image005.png](#)
[image007.png](#)
[image006.png](#)
[image004.png](#)
[image001.png](#)
[image005.png](#)
[MNHR - Letter to stat cons Scoping & Reg 11 Notification.doc.pdf](#)
[image002.png](#)
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[image006.png](#)
[image001.png](#)
[image004.png](#)

You don't often get email from onr-land.use-planning@onr.gov.uk. [Learn why this is important](#)

Dear Sir/Madam,

The proposed development does not present a significant external hazard to the safety of the nuclear site.

Therefore, ONR does not advise against this development.

Kind regards,

Land Use Planning
Office for Nuclear Regulation
ONR-Land.Use-planning@onr.gov.uk

-----Original Message-----

From: LUP Queue <onr-land.use-planning@onr.gov.uk>
To: onr-land.use-planning@onr.gov.uk;
Cc:
Sent: 17/11/2023 09:20
Subject: FW: EN010156 - Prosiect Maen Hir - EIA Scoping Notification and Consultation

From: Maen Hir Solar <maenhirsolar@planninginspectorate.gov.uk>
Sent: 13 November 2023 09:58
Subject: EN010156 - Prosiect Maen Hir - EIA Scoping Notification and Consultation

Dear Sir/Madam

Please see attached correspondence on the proposed Prosiect Maen Hir.

Please note the deadline for consultation responses is **11 December 2023** and is a statutory requirement that cannot be extended.

Kind regards,

Todd Brumwell



Todd Brumwell | EIA Advisor

The Planning Inspectorate

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This email has been scanned for viruses and malicious content, but no filtering system is 100% effective and this is no guarantee of safety or validity.

Your Ref: EN010156-000006

7th December 2023

Our Ref: B1HP3550

Emma Cottam
Senior EIA Advisor, The Planning Inspectorate
Environmental Services, Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Dear Emma,

Nationally Significant Infrastructure Project

Application by Lightsource bp who are promoting for Lightsource SPV 204 Limited (the Applicant) for an Order granting Development Consent for the Prosiect Maen Hir (the Proposed Development)

Scoping Consultation Stage

Thank you for including Public Health Wales (PHW) in the scoping consultation phase of the above application. PHW is the national public health agency for Wales and works in collaboration with the seven health boards around Wales to protect and promote health and wellbeing. The Environmental Public Health team in PHW **has reviewed the applicant's** scoping report and associated documents. The response is impartial and independent, feedback is provided below.

Public Health Wales recognises this project as a Nationally Significant Infrastructure Project (NSIP) and we acknowledge the response from UKHSA, our partners in the Environmental Public Health Service in Wales (EPHSW). We agree with the response from UKHSA and in particular the reference to the document '*Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹'. We would expect to see the advice and recommendations from this document reflected in any ES.

We are encouraged that the relevant information has been included in the scoping document, such as the section on Health, which includes a consideration of health indicators within the local population (in Anglesey) compared with all Wales averages; changes in the demographic profile over the next two decades and the associated implications on healthcare; and a statement on deprivation and inequalities. We are also encouraged to see reference to the Anglesey Health Impact Assessment tool, Anglesey and Gwynedd Joint Local Development Plan and the Wellbeing of Future Generations Act in relation to formulating the human health impact assessment (HIA) for this project.

Any HIA must take account of vulnerable populations, which are explicitly mentioned in table 7-54, including refugee groups, travellers, BME groups etc.,

as well as the services these groups are reliant on which may be impacted by the project, such as schools, care homes and healthcare facilities. It is also mentioned that a health needs assessment will be conducted, which we also consider a positive step and a useful tool for assessing the local health needs that will inform the development of the project.

Furthermore, we are encouraged by any projects that mitigate the impacts of climate change by reducing reliance on fossil fuels and transitioning to renewable energy sources such as solar, wind, tidal etc., provided the emissions related to the construction and maintenance of the site are kept to a minimum and offset by the longevity of the project.

As stated, PHW works closely with health boards across Wales. Since this project is located within Betsi Cadwaladr University Health Board (BCUHB), we can work with the Director of Public Health (DPH) within BCUHB to make them aware of the project and around any health concerns that may arise from the project. There may be some aspects of the development relating to health of the population that can be fielded directly to the DPH, as the lead for local public health issues.

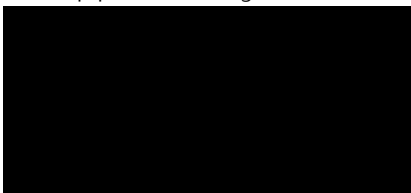
We hope this response has been useful and welcome correspondence on any points of clarity or concerns raised.

Yours sincerely,



Environmental Public Health Scientist

Approved by



Principal Environmental Public Health Specialist

On behalf of Environmental Public Health Service in Wales

¹<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>

Eich Cyf: EN010156-000006

7 Rhagfyr 2023

Ein cyf: B1HP3550

Emma Cottam

Uwch Gyngorydd Asesiadau o'r Effaith ar Gydraddoldeb, yr Arolygiaeth
Gynllunio

Gwasanaethau Amgylcheddol, Grŵp Gweithrediadau 3

Temple Quay House

2 The Square

Bristol, BS1 6PN

Annwyl Emma

Prosiect Seilwaith o Arwyddocâd Cenedlaethol

Cais gan Lightsource bp sy'n hyrwyddo ar gyfer Lightsource SPV 204
Limited (yr Ymgeisydd) am Orchymyn yn rhoi Caniatâd Datblygu ar
gyfer Prosiect Maen Hir (y Datblygiad Arfaethedig)

Cam Ymgynghori - Cwmpasu

Diolch am gynnwys Iechyd Cyhoeddus Cymru yng ngham cwmpasu'r
ymgynghoriad ar y cais uchod. Iechyd Cyhoeddus Cymru yw asiantaeth iechyd y
cyhoedd genedlaethol Cymru ac mae'n gweithio ar y cyd â'r saith bwrdd iechyd
ledled Cymru i ddiogelu a hybu iechyd a llesiant. Mae tîm Iechyd y Cyhoedd
Amgylcheddol, Iechyd Cyhoeddus Cymru, wedi adolygu adroddiad cwmpasu'r
ymgeisydd a'r dogfennau cysylltiedig. Mae'r ymateb yn ddiduedd ac yn
annibynnol. Rhoddir adborth isod.

Mae Iechyd Cyhoeddus Cymru yn cydnabod y prosiect hwn fel Prosiect Seilwaith
o Arwyddocâd Cenedlaethol ac rydym yn cydnabod yr ymateb gan
Asiantaeth Diogelwch Iechyd y DU (UKHSA), ein partneriaid yng Ngwasanaeth
Iechyd Cyhoeddus Amgylcheddol yng Nghymru (EPHSW). Rydym yn cytuno â'r
ymateb gan UKHSA ac yn arbennig y cyfeiriad at y ddogfen '*Advice on the
content of Environmental Statements accompanying an application under the
NSIP Regime*' (Saesneg yn unig). Byddem yn disgwyl gweld y cyngor a'r
argymhellion a nodir yn y ddogfen hon yn cael eu hadlewyrchu mewn unrhyw
Ddatganiad Amgylcheddol.

Mae'n galonogol bod yr wybodaeth berthnasol wedi'i chynnwys yn y ddogfen
gwmpasu, megis yr adran ar Iechyd, sy'n cynnwys ystyriaeth o ddangosyddion
iechyd o fewn y boblogaeth leol (yn Ynys Môn) o'i gymharu â chyfartaleddau
Cymru gyfan; newidiadau yn y proffil demograffig dros y ddau ddegawd nesaf a'r
goblygiadau cysylltiedig ar ofal iechyd; a datganiad ar amddifadedd ac
anghydraddoldebau. Rydym hefyd yn cael ein calonogi i weld cyfeiriad at offeryn
Asesiad o'r Effaith ar Iechyd Ynys Môn, Cynllun Datblygu Lleol ar y Cyd Môn a
Gwynedd a Deddf Llesiant Cenedlaethau'r Dyfodol mewn perthynas â llunio'r
asesiad o'r effaith ar iechyd (HIA) ar gyfer y prosiect hwn.

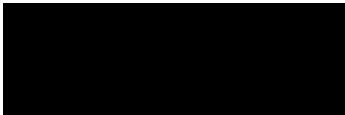
Rhaid i unrhyw HIA ystyried poblogaethau sy'n agored i niwed, a grybwyllir yn benodol yn nhabl 7-54, gan gynnwys grwpiau ffoaduriaid, teithwyr, grwpiau BME ac ati, yn ogystal â'r gwasanaethau y mae'r grwpiau hyn yn dibynnu arnynt y gallai'r prosiect effeithio arnynt, megis ysgolion, cartrefi gofal a chyfleusterau gofal iechyd. Nodir hefyd y bydd asesiad o anghenion iechyd yn cael ei gynnal, yr ydym hefyd yn ei ystyried yn gam cadarnhaol ac yn arf defnyddiol ar gyfer asesu'r anghenion iechyd lleol a fydd yn llywio datblygiad y prosiect.

Ymhellach, rydym wedi ein calonogi gan unrhyw brosiectau sy'n lliniaru effeithiau newid yn yr hinsawdd trwy leihau dibyniaeth ar danwyddau ffosil a symud i ffynonellau ynni adnewyddadwy fel solar, gwynt, llanw ac ati, cyn belled â bod yr allyriadau sy'n gysylltiedig ag adeiladu a chynnal a chadw'r safle yn cael eu cadw i'r lleiafswm a'u gwrthbwysu gan hirhoedledd y prosiect.

Fel y nodwyd, mae Iechyd Cyhoeddus Cymru yn gweithio'n agos gyda byrddau iechyd ledled Cymru. Gan fod y prosiect hwn wedi'i leoli ym Mwrdd Iechyd Prifysgol Betsi Cadwaladr (BIPBC), gallwn weithio gyda'r Cyfarwyddwr Iechyd y Cyhoedd yn BIPBC i'w wneud yn ymwybodol o'r prosiect ac unrhyw bryderon iechyd a all godi o'r prosiect. Mae'n bosibl y bydd rhai agweddau ar y datblygiad sy'n ymwneud ag iechyd y boblogaeth y gellir eu cyfeirio'n uniongyrchol at y Cyfarwyddwr Iechyd y Cyhoedd, fel yr arweinydd ar gyfer materion iechyd y cyhoedd lleol.

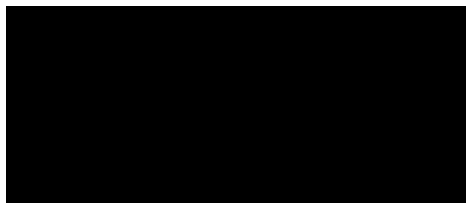
Gobeithiwn fod yr ymateb hwn wedi bod yn ddefnyddiol a chroesawn ohebiaeth ar unrhyw bwyntiau o eglurder neu bryderon a godwyd.

Yn gywir,



Gwyddonydd Iechyd Cyhoeddus Amgylcheddol

Cymeradwywyd gan



Prif Arbenigwr Iechyd Cyhoeddus Amgylcheddol

Ar ran y Gwasanaeth Iechyd Cyhoeddus Amgylcheddol yng Nghymru

[1https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+tatements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Plannin+g+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658](https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+tatements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Plannin+g+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658)



UK Health
Security
Agency

Environmental Hazards and Emergencies Department
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Cardiff Metropolitan University
Western Avenue
Cardiff, CF5 2YB

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Your Ref: EN010156
Our Ref: 64782

Ms Emma Cottam
Senior EIA Advisor
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

7th December 2023

Dear Ms Cottam

**Nationally Significant Infrastructure Project
Application by Lightsource bp who are promoting for Lightsource SPV 204 Limited
(the Applicant) for an Order granting Development Consent for the Prosiect Maen Hir
(the Proposed Development)
Scoping Consultation Stage**

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the consultation documents, we do not have any specific comments at this stage.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA's predecessor organisation Public Health England (PHE) produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

It should be noted that Public Health Wales (PHW) is the national public health agency in Wales who will take the lead in health and wellbeing considerations

We hope the information provided is useful and would welcome discussions to clarify any specific concerns or enquiries you may have.

Yours sincerely

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

¹
<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>