Candwr Solar Farm

Pre Application Consultation

Environmental Statement

Appendix 2.4 EIA Scoping Direction Response Summary

2 July 2026

TotalEnergies

1 Appendix 2.4 – EIA Scoping Direction Response Summary

1.1 Introduction

1.1.1. This document forms Appendix 2.4 of the Environmental Statement (ES) prepared on behalf of the Applicant. The ES presents the findings of the Environmental Impact Assessment (EIA) process for the for the construction, operation and decommissioning of Candwr Solar Farm, a ground mounted solar photovoltaic (PM) farm approximately 46 Mega Watts (MW) with all associated works, equipment and necessary infrastructure (the "Proposed Development") on land at Court Farm, Ponthir, Monmouthshire (the "Application Site").

1.1.2. This document provides a schedule of all the comments made by PEDW, with details of how these comments have been addressed within the EIA or reported in the ES. **Table 1.1** details the responses.

Table 1-1 : EIA Scoping Direction Response Summary

ID	Reference in Scoping Direction	Matter	Comment	Applicant Response
ID.1	3.	Proposed Development	The proposal as described in the SR is for installation and operation of ground mounted solar photovoltaic arrays with all associated works, equipment and necessary infrastructure on the Application Site. The proposed installed generation capacity is up to 46 MW. Further information is available in section 2.2 of the SR. The scope of the EIA should include all elements of the development as identified in the SR, both permanent and temporary, and this Scoping Direction is written on that basis	The Applicant notes this comment. All elements of the Proposed Development infrastructure (permanent and temporary) as identified in the **EIA Scoping Report** (**Appendix 2.1**) is considered and assessed in the ES.
ID.2	3.	Proposed Development	In the ES, any maps, drawing and illustrations that are proposed to describe the project should be designed in such a way that they	The Applicant notes this comments and plans adhere to this.

			can be overlaid with drawings and illustrations produced for other sections.	
ID.3	3.	Proposed Development	In line with the requirements of Regulation 17 and Schedule 4 to the 2017 Regulations, any reasonable alternatives considered should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed the choices made.	**ES Chapter 4 – Proposed Development and Alternatives** considers reasonable alternatives, including location, design and technologies, and environmental effects have informed the choices made.
ID.4	5.	Environmental Impact Assessment Approach	The Applicants should satisfy themselves that the ES includes all the information outlined in Schedule 4 of the 2017 Regulations. In addition, the Applicant should ensure that the Non- Technical Summary includes a summary of all the information included in Schedule 4. Consider a structure that allows the author of the ES and the appointed Inspector and Decision Maker to readily satisfy themselves that the ES contains all the information specified Regulation 17 and Schedule 4 of the 2017 Regulations. Cross refer to the requirements in the relevant sections of the ES, and include a summary after the Contents page that lays	The Applicant has considered Schedule 4 of the 2017 Regulations and is satisfied the ES includes all necessary information. A **Non-Technical Summary** is provided with the application, summarising the ES in non-technical language. The ES is set out in separate chapters. **ES Chapter 1 – 4** are opening chapters setting out the

			out all the requirements from the Regulations and what sections of the ES they are fulfilled by.	methodology, application site baseline context, the proposed development description and alternatives. Eight environmental technical chapters are provided that assess any likely significant effects in relation to the Proposed Development. A summary chapter is provided at the end of the ES to recap on the ES and outline residual effects and mitigation measures. A glossary and references chapter is additionally provided. Therefore, the ES contains all the information specified in Regulation 17 and Schedule 4 of the EIA Regulations. **Appendix 2.3- EIA Regulations Conformity** sets out requirements from the EIA Regulations and what sections of the ES they are fulfilled by.
ID.5	5.	Environmental Impact	As the assessments are made, consideration should be given to whether standalone topic	The Applicant notes the comment. The structure of the ES, including

		Assessment Approach	chapters would be necessary for topics that are currently proposed to be considered as part of other chapters, particularly if it is apparent that there are significant effects and a large amount of information for a particular topic.	whether environmental topics are addressed within standalone chapter, assessments appended to the ES or as standalone technical assessments submitted outside of the ES supporting the wider planning application has been kept under review throughout the assessment process. The Applicant has had regard to the nature, scale and characteristics of the Proposed Development, the extent of baseline information available, and the likelihood of significant environmental effects. Additionally, the Applicant has had due regard to PEDWs EIA Scoping Direction (**Appendix 2.2**). Where topics are not anticipated to give rise to likely significant effects or are closely interrelated with other disciplines, they have been assessed proportionately within the ES.
ID.6	5.	Environmental Impact	There may also be topic areas scoped out of the ES where the developer may wish to	The Applicant notes the comment and confirms that this approach has

		Assessment Approach	include application documents that sit outside of the ES and provide information that will support their consultation(s) and the decision-making process. The developer is encouraged to liaise with key consultees regarding non-ES application documents which are not a legislative requirement of the DNS regime.	been adopted in the preparation of the application documentation. A number of topic areas which are not required to be assessed as part of the ES, either due to the absence of likely significant environmental effects or because they fall outside the scope of the EIA Regulations, are nevertheless supported by standalone application documents. These documents have been prepared where appropriate to inform consultation and to assist the decision-making process. Key stakeholders and consultees have been engaged with during the preparation of the application, as relevant, and this engagement is documented in the assessments
			Schedule 4 of the 2017 Regulations states that the 'baseline scenario' is "A description of the relevant aspects of the current state of the environment" (emphasis added). The	The Applicant confirms the baseline conditions of the current state of the environments have been considered and documented in **ES Chapter 3 – Application Site**, and in all ES

			baseline of The ES should reflect actual current conditions at that time.	Technical Chapters (5-12) in the opening sections of the chapters.
ID7.	5.1	Baseline	In line with the requirements of Regulation 17 and Schedule 4 to the 2017 Regulations, any reasonable alternatives studied by the Applicant should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed the choices made.	**ES Chapter 4 – Proposed Development and Alternatives** considers reasonable alternatives, including location, design and technologies, and environmental effects have informed the choices made.
ID8.	5.2	Reasonable Alternatives	It is worth bearing in mind that under the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations") unless it can be clearly shown to the Welsh Ministers that the project would have no adverse effect on the integrity of any designated sites, it would have to be shown that there is no feasible alternative solution. Further advice regarding the Habitats Regulations is provided in the final chapter of this Scoping Direction.	Information to inform the HRA is presented in **Appendix 6.8** of the ES and provides the Competent Authority with ecological information regarding the Proposed Development with respect to its potential, either alone or in-combination with other projects, to result in a Likely Significant Effect (LSE) upon the qualifying features of European sites in the UK (i.e. those which form part of the National Site Network); and, where a LSE cannot be ruled out, whether the Proposed Development would have an adverse

				impact on the integrity of the designated site. Four European sites were identified for screening, namely the River Usk SAC; and the Severn Estuary SPA, Ramsar site and SAC. All four European sites were assessed at stage 1: potential for LSE. This stage determined no LSE for the following protected sites/ qualifying features: River Usk SAC (habitats), Severn Estuary SPA (all listed features), Severn Estuary Ramsar site (habitat and ornithological features) and Severn Estuary SAC (all listed features). These protected sites/ qualifying features were screened out and no Appropriate Assessment (AA) is required. For River Usk SAC (fish and otter) and Severn Estuary Ramsar site (fish) it was not possible to conclude no LSE and these protected areas/

				qualifying features were taken forwards to stage 2: AA. The AA found that, following the inclusion of mitigation, an adverse effect on the integrity of the River Usk SAC and Severn Estuary Ramsar site would not occur as a result of the Proposed Development. As well as investigating potential impacts for the Proposed Development alone, in-combination impacts were also assessed. Cumulative schemes identified were considered to be sufficiently distanced from River Usk SAC and Severn Estuary Ramsar site such that there would be negligible impacts following implementation of embedded mitigation. No adverse in-combination effects on site integrity were concluded. As such, the Applicant does not consider that it is necessary to progress to consideration of

				alternative solutions or the tests associated with derogation under the Habitats Regulations.
ID9.	5.3	Currency of Environmental Information	For all environmental aspects, the applicant should ensure that any survey data is as up to date as possible and clearly set out in the ES the timing and nature of the data on which the assessment has been based. Any study area applied to the assessments should be clearly defined. The impacts of construction, operation and decommissioning activities should be considered as part of the assessment where these could give rise to significant environmental effects. Consideration should be given to relevant legislation, planning policies, and applicable best practice guidance documents throughout the ES.	The Applicant notes the comment, and all survey data is as up to date as possible. Timings and nature of data are set out in the 'Assessment Approach' section of technical ES chapters and/or in supporting appendices. Study areas are clearly defined and set out in individual technical chapters. The study areas applied to each assessment have been defined having regard to the nature of the receptor, the characteristics of the Proposed Development, and the potential pathways for effects to occur. As such, study areas are not uniform across the ES but instead vary between technical disciplines to ensure that each assessment is

				proportionate and appropriately focussed. The Applicant confirms the construction, operation and decommissioning phases have been considered in the ES where these have the potential to give rise to likely significant environmental effects. Some ES technical chapters have scoped out certain phases where it has been demonstrated that they would not give rise to significant environmental effects. All ES technical chapters set out in the 'Assessment Approach' section legislative, policy and guidance framework the assessment adheres to.
ID10.	5.3	Currency of Environmental Information	The ES should include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in	**ES Chapter 2- EIA Assessment Scope and Methodology** sets out the overarching methodology for the ES setting out a general criteria clearly distinguishes effects that are 'significant' from 'non-significant'

			individual aspect assessment chapters. Where professional judgement has been applied this should be clearly stated.	effects. However, it is recognised that the criteria used to define sensitivity, magnitude and significance will vary between environmental disciplines, reflecting the differing characteristics of receptors, impact pathways, and established guidance for each topic. As such, each technical chapter sets out its own topic-specific methodology, including the criteria used to determine the significance of effects, where this differs from or builds upon the overarching framework set out in **ES Chapter 2- EIA Assessment Scope and Methodology.** Any departures from the general methodology, including the application of professional judgement, are clearly described and justified within the relevant technical chapters.
ID11.	5.3	Currency of Environmental Information	The ES topic chapters should report on any data limitations, key assumptions and difficulties encountered in establishing the	The Applicant notes the comment and limitations and assumptions are set out in the 'Assessment

			baseline environment and undertaking the assessment of environmental effects.	Approach' section of technical ES chapters and/or in supporting appendices.
ID12.	5.4	Cumulative Effects	In accordance with Schedule 4, Paragraph 5(e) of the 2017 Regulations, the ES should include a description of the likely significant effects of the development on the environment resulting from "the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance to be likely affected or the use of natural resources". The Planning Inspectorate's guidance for Nationally Significant Infrastructure Projects – Advice on Cumulative Effects Assessment sets out a staged process for assessing cumulative impacts which the Applicant should follow when preparing the list of projects for inclusion in the ES:https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulativeeffects- assessment	The Applicant notes the comment. A comprehensive cumulative effects assessment (CEA) has been undertaken in accordance with Schedule 4, Paragraph 5(e) of the EIA Regulations 2017, set out within individual technical ES chapters under section heading 'Cumulative Effects'. The ES includes an assessment of the likely significant effects arising from the Proposed Development in combination with other existing, approved and reasonably foreseeable projects, taking into account environmental constraints and sensitivities within the study area, including areas of particular environmental importance and the use of natural resources.

			The Applicant should ensure that relevant schemes identified are addressed in the ES using the tiered approach set out in the Advice. There may be other types of development that could have cumulative impacts with the proposal, and it should not be assumed that the consideration of cumulative impacts can be restricted to other renewable energy proposals. Effects deemed individually not significant from the assessment, could cumulatively be significant, so inclusion criteria based on the most likely significant effects from this type of development may prove helpful when identifying what other developments should be accounted for. The criteria may vary from topic to topic. Best practice is to include proportionate information relating to projects that are not yet consented, dependent on the level of certainty of them coming forward. All of the other developments considered should be documented and the reasons for	The cumulative assessment has been undertaken in line with relevant guidance. The selection of schemes for inclusion within the cumulative ensures that the assessment captures those developments with the potential to give rise to cumulative effects, including developments outside of the renewable energy sector where relevant. The cumulative assessment considers the potential for effects which may be individually not significant to become significant in-combination. The approach to the cumulative assessment is set out in **ES Chapter 2- EIA Assessment Scope and Methodology,** with further detail provided within the relevant technical chapters justifying their inclusion or exclusion within the

			inclusion or exclusion should be clearly stated. Professional judgement should be used to avoid excluding other development that is close to threshold limits but has characteristics likely to give rise to a significant effect; or could give rise to a cumulative effect by virtue of its proximity to the proposed development. Similarly, professional judgement should be applied to other development that exceeds thresholds but may not give rise to discernible effects. The process of refinement should be undertaken in consultation with NRW, Cadw and other consultees, where appropriate. The scope of the cumulative assessment should be fully explained and justified in the ES.	assessment as each environmental discipline may have a different zone of influence setting out inclusion within the cumulative assessment. On this basis, the Applicant is satisfied that the cumulative effects assessment is robust, proportionate and compliant with the requirements of the EIA Regulations and relevant guidance.
ID13.	5.5	Mitigation	Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured (through legal	The Applicant notes the comment. The ES sets out mitigation measures for each individual ES technical environmental chapter in a clear and proportionate manner, including embedded mitigation (i.e. measures incorporated into the design of the Proposed Development) and

			requirements or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.	additional mitigation required to avoid, reduce or offset potential adverse effects. The mitigation measures are described in detail in ES technical chapters under 'Mitigation, Enhancement and Residual Effects' and, where appropriate, within supporting appendices and management plans. An assessment of residual effects following the implementation of mitigation measures is included in this section. This ensures that the conclusions of the ES are based on a clear understanding of the effectiveness of the proposed mitigation and the extent to which it reduces potential impacts, with many topics demonstrating that residual effects are reduced to negligible or not significant levels following mitigation. The ES also clearly identifies how mitigation measures will be delivered and secured, set out within individual ES technical environmental chapters

				and in **ES Chapter 13 – Summary**. The Applicant has engaged with relevant statutory consultees throughout the EIA and application process to inform the development of mitigation measures.
ID14.	5.6	Population and Human Health	The Applicant should ensure that the ES addresses any significant effects on population and human health, in light of the EIA Regulations 2017. This could be addressed under the separate topic chapters or within its own specific chapter.	The Applicant note the comment. Potential effects are considered proportionately across ES technical chapters/ appendices, and an Outline CEMP. The topic is therefore scoped into the ES but not as a separate chapter.
ID15.	5.7	Transboundary Effects	Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The ES should address this matter as appropriate.	The Applicant acknowledges the requirement set out in Schedule 4, Part 5 of the EIA Regulations. The potential for transboundary effects has been considered as part of the EIS. Having regard to the nature, scale and location of the Proposed Development, it is not anticipated that the Scheme would give rise to likely significant transboundary effects. The Proposed

				Development is located wholly within Wales and is not of a type or scale that would result in environmental effects extending beyond the UK. On this basis, the Applicant has not identified any likely significant transboundary effects that would require further assessment within the ES as set out in **ES Chapter 2 – EIA Assessment Approach and Scope**. This conclusion is considered to be proportionate and appropriate to the characteristics of the Proposed Development.
ID16.	5.8	Topics Scoped In but not subject to a standalone chapter	For such topics it may be helpful to users of the ES if it includes a summary table that signposts the chapters where these matters are addressed.	A summary table is included in **ES Chapter 2 – EIA Assessment Approach and Scope** identifying environmental topics scoped out of the ES and not subject to standalone chapters.
ID.17	Table 1 (ID.1)	Defining the scope of the project	PEDW notes TCBC's concerns in their response regarding the description and of the proposed development for EIA purposes. Whilst TCBC advise that the project should	The Applicant notes the comment. The Applicant has considered the relevance of the case law cited by TCBC, including R (Ashchurch Rural

			include the operations of the water treatment works, having considered the case law quoted in their response (R (Ashchurch Rural Parish Council) v Tewkesbury Borough Council [2023] EWCA 101) I do not consider the solar farm to have a standalone purpose or to be an enabler of the water treatment works as it is currently functioning without it. As advised by TCBC, this should be justified in the introduction of the ES.	Parish Council) v Tewkesbury Borough Council [2023], in determining whether the Proposed Development should be defined more widely to include the operation of Dŵr Cymru Welsh Water Court Farm Treatment Works. Having regard to this case law and the principles established therein, the Applicant has considered whether the solar farm and Dŵr Cymru Welsh Water Court Farm Treatment Works form part of a single project for the purposes of the EIA, including whether there is any functional dependency or enabling relationship between them. The Applicant concludes that the Proposed Development (the solar farm) does not constitute an enabler of, nor is it functionally interdependent with Dŵr Cymru Welsh Water Court Farm Treatment Works. Dŵr Cymru Welsh Water Court Farm Treatment Works is an

				existing, standalone operation that is capable of continuing to operate independently of the Proposed Development. The solar farm does not form an integral part of the water treatment works, nor is it required to facilitate its operation. Accordingly, Dŵr Cymru Welsh Water Court Farm Treatment Works does not form part of the Proposed Development as defined for EIA purposes and is not included within the scope of the application or the ES. The ES therefore assesses the environmental effects of the solar farm as a standalone project, consistent with the development for which consent is being sought. This approach aligns with established EIA principles that require the assessment to focus on the development as applied for, and to avoid speculative or hypothetical

				assessment of separate or unrelated development. **ES Chapter 4 – Proposed Development and Alternatives** sets out this information.
ID.18	Table 1 (5.1)	Population	PEDW agrees that a standalone chapter is not required, but Population should be addressed in appropriate chapters of the ES. This topic is therefore scoped into the ES, but not as a standalone chapter.	The Applicant note the comment. Potential effects are considered proportionately across ES technical chapters/ appendices, and an Outline CEMP. The topic is therefore scoped into the ES but not as a separate chapter.
ID.19	Table 1 (5.2)	Human Health	PEDW agrees that a standalone chapter is not required and that Human Health should be addressed in appropriate chapters of the ES. The SR states that construction activities will be appropriately controlled to an acceptable level through the adoption of a Constriction Environmental Management Plan (CEMP), it is recommended that this is included as a technical appendix to the ES. This topic is	The Applicant note the comment. Potential effects are considered proportionately across ES technical chapters/ appendices, and an Outline CEMP. The topic is therefore scoped into the ES but not as a separate chapter.

			therefore scoped into the ES, but not as a standalone chapter.	
ID.20	Table 1 (5.3)	Ground Conditions and Land	PEDW and NRW agree with the reasoning set out in the SR to scope out Ground Conditions and Land.	The Applicant notes this comment and Ground Condition and Land is scoped out of the ES. A Phase 1 Geoenvironmental Desk Study is submitted as a standalone document outside of the ES supporting the planning application.
ID.21	Table 1 (5.4)	Water Environment	Given that the majority of the site is within Flood Zone 1 and no built development is proposed in Flood Zone 2 or 3, NRW considerers a Flood Consequences Assessment outside of the EIA process to be appropriate, therefore fluvial flooding can be scoped out of the ES. MCC agree and advise that this is acceptable mitigation from a flood risk perspective. MCC add that any SuDS attenuation or infiltrating features should not be built within flood zones unless the individual features are designed to receive the additional flow from the catchment. The Applicant's attention is drawn to MCCs comments regarding SuDS.	A Flood Consequence Assessment assessing fluvial, tidal, surface water and small watercourses, groundwater, reservoir and sewer food risk is appended to the ES (**Appendix 9.1 – Flood Consequence Assessment and Surface Water Drainage Strategy Report**). As shown in **Appendix 9.1** of the ES, SuDS within the proposed surface water drainage strategy are not proposed within flood zones. **Chapter 9- Water Environment** of the ES considers the potential

			CSOG, F. Bromfield and S. Williams raise concerns regarding increased impermeable ground surface as a result of the development and the impact of surface water runoff on the Candwr Brook. They consider the proposed impermeable hard surface area and disruption to natural drainage patterns will lead to more frequent and severe flooding downstream in Ponthir. The Applicant should address these comments in the ES and liaise with the Lead Local Flood Authorities (LLFAs). The Applicant's attention is drawn to NRW's advice in the response in Appendix 1 regarding high voltage fluid filled cables have the potential to result in contamination/pollution of groundwater. NRW refer to the information that should be included with a planning application and guidance/resources. TCBC advise that the following assessments should be scoped into the ES and should inform and consider how during construction and operation surface after would not affect	effects during both the construction and operational phase of the development including on surface water drainage patterns and water quality which have a residual effect of Negligible (not significant). The Applicant can confirm that proposed cables used will not be fluid-filled, only dry XLPE cables have been specified, with cable joints also being dry. This type of cable provides total environmental immunity and zero impact to the local environment and location of installation. As such, the cables will not have the potential to contaminate groundwater. Discussions are ongoing with Torfaen County Borough Council regarding water feature surveys and water management plans.

			the water quality that leads to the River Usk and Severn: • Water Feature Survey • Water Management Plan • Pollution Prevention Measures • Restoration Hydrology and pollution are therefore scoped into the ES.	
ID.21	Table 1 (5.4)	Transport and Access	NCC highlight that there may be potential significant effects related to transport and access during construction and decommissioning due to the nature of the local highway network. It is noted that the SR suggests standalone technical reports, including a Construction Traffic Management Plan (CTMP), that will be prepared to assess transport impacts, however, NCC raise concerns in regard to the assessment of impacts prior to identifying routes, a construction programme, likely traffic generation profiles, enabling and mitigation measures.	All three local authorities advised that further information is required to assess the impact of the development. An **Outline Construction Traffic Management Plan** (CTMP) has been prepared as part of the wider DNS application and is included as an Appendix to the Environmental Statement. The CTMP addresses the following points raised by the local highway authorities of NCC, MCC and TCBC as well as other third party groups and individuals:

			NCC consider there to be insufficient information to rule out significant impacts as suggested by the SR. They add that the extent of highway requirements is not known at this stage and should be considered cumulatively to other impacts. NCC state that they would not accept that it can be assumed that highway impacts are insignificant until the TA and CEMP have been completed, and mitigation measures agreed. In terms of HGV movements during construction, NCC suggest that more information will be required regarding prolonged peak activity and more detailed profile of movements to ascertain the true impacts as averages will not demonstrate a true representation. MCC suggest further transport and access related points for consideration in their response in Appendix 1. They include that it would be useful to include contingency planning for adverse weather, road closures or other disruptions common in rural areas within the CTMP. They also suggest what they	- Construction Programme (details as accurate as possible but ultimately indicative at this early stage in the DNS process). - Forecast vehicle trip generation during the construction and operational phases. - Mitigation measures to limit impact on the local highway network during the construction phase, supported by empirical evidence in the form of traffic surveys. - Delivery and operational hours. - Details of contingency planning for unforeseen circumstances e.g. adverse weather, road closures and emergency situations.

			consider to be the most appropriate primary access routes consideration in their response in Appendix 1. MCC advises the applicant to consider timings of deliveries to avoid peak traffic flows to minimise further congestion of the proposed routes. Detailed analysis of all traffic movements will be required. TCBC agree that transport and access should be scoped in. They state that traffic surveys will be necessary to assess direct, indirect and cumulative impacts upon the existing road networks and cycle paths. TCBC add that traffic assessments should include all routes that were considered and reasons why those routes have been discounted. Both TCBC and NCC require details of vegetation that would be removed to allow vehicles to access the site, TCBC adds that the location of the proposed compound need to be fully justified to demonstrate how their siting have reduced traffic movements. NCC add that other measures needed to provide access routes are not known at this stage but	- Details relating to the proposed site access arrangements including any vegetation loss. - Number and locations of site construction compounds; and - Proposed construction traffic routing including assessment of other potential routes.

			could impact further hedge row, drainage culverts, congestion, public rights of way users etc TCBC include that hours of operation will need to be outlined within the Transport chapter, and that the ES should consider construction and operational phases, along with a draft CEMP that considers matters of dust, noise and smell. The applicant's attention is also drawn to the 'Access options Assessment Report' included in Appendix 1, prepared on behalf of "Protect Candwr and Ponthir Countryside Group" (PCPCG). This assessment should be considered when selecting construction vehicle routes and site access. A number of Interested Parties raise concerns in their responses included in Appendix 1. The Applicant's attention is drawn to these comments in regard to Transport and Access. Their concerns relate to the impact of HGV traffic during construction along country lanes for residents, highway safety and amenity use etc.	

			The applicant's attention is also drawn to comments from K. Jackson which includes concerns related to each of the proposed routes. These comments should be considered during the route selection process. Transport and Access are therefore scoped into the assessment, due to insufficient information, unless robust justification or evidence of agreement the relevant Local Authorities is included in the ES. Any documents which contain mitigation measures to prevent potential significant effects such as a CTMP or CEMP should be included (even if in draft form) as technical appendices to the ES.	
ID.22	Table 1 (5.15)	Air Quality	There are concerns in regard to impact on Air Quality from HGV deliveries. NCC raises concerns if deliveries are made via the Caerleon Air Quality Management Area (AQMA). CSOG raise concerns regarding the AQMA, claiming that it is a prohibited route,as the	Air Quality has been scoped into the ES for the construction and decommissioning phases, specifically to assess the impacts of HGV deliveries on nearby sensitive receptors and along the proposed construction traffic routes. Since submission of the Scoping Report, the construction traffic route has

			road serves an infant's school, primary and secondary schools, amongst other services. TCBC note that the SR does not provide justification for its conclusion that there will be little impact on the Caerleon AQMA. Air Quality is scoped into the ES during construction and decommissioning phases, due to the impact of HGV deliveries on nearby sensitive receptors and the potential delivery route passing through the Caerleon Air Quality Management Area.	been amended and no longer passes through the Caerleon AQMA. The revised route passes through the St Julian's AQMA; however, NCC have indicated intentions to revoke this AQMA. The **ES Chapter 12 – Air Quality** assesses construction phase traffic flows against IAQM guidance and considers the sensitivity of receptors along the revised route. Mitigation measures, including a **Construction Traffic Management Plan** (CTMP), are secured to minimise effects on local air quality and ensure that significant adverse effects are not anticipated.
ID.23	Table 1 (5.16)	Noise and Vibration	Noise should be addressed in the relevant chapters, however, PEDW agrees that a standalone chapter for Noise and Vibration can be scoped out of the ES. The Applicant should note that this should be addressed in the CEMP. S. Williams raises concerns regarding operational noise emitted from inverters/ transformers and fans as well as pile driving	The Applicant notes the comment. Noise and Vibration is accordingly scoped out of the ES as a standalone chapter. A **Noise Assessment** (**Appendix 2.5**) is appended to the ES. Operational noise from relevant infrastructure components including inverters/ transformers and fans is included in the assessment. Due to

			on residential properties, this should be addressed in a proportionate manner in the ES, e.g. with reference to the relevant noise assessment / agreement with Environmental Health Officers.	the temporary timeframes and limited noise implications from construction equipment, the construction phase has been scoped out of the assessment. Construction noise will be controlled through the **Outline Construction Environmental Management Plan** controlling working hours, specification of appropriate plant and methods and standard best practice measures that will be used.
ID.24	Table 1 (5.17)	Climate	PEDW agree that Climate can be scoped out as a standalone chapter and addressed in the relevant sections of the ES. TCBC note that the impacts during construction should be assessed in relation to Climate. The applicant may wish to include a carbon balance assessment if they consider the development would have significant benefits in terms of carbon emissions. Climate is therefore scoped into the ES in a proportionate	The Applicant notes the comment. Climate is accordingly scoped out of the ES as a standalone chapter. A **Climate Change Assessment** (**Appendix 2.6**) is appended to the ES.

			manner, but not necessarily as a standalone chapter.	
ID.25	Table 1 (5.18)	Cultural Heritage and Archaeology	NCC comment that they consider there to be significant scope for changes in the setting of Heritage Assets near the site, however, Cadw agree with the approach set out in the SR to address issues relating to Cultural Heritage and Archaeology in separate reports, such as a heritage desk-based assessment, outside of the ES. S. Williams raises concerns in her response in Appendix 1 regarding her Grade II listed property and the potential impact on its stability as a result of pile driving and the impact on the setting of the historic asset. This should be addressed in subsequent heritage assessments. Cadw notes the scheduled monuments listed in their response in Appendix 1, which may have views to and from the proposed solar farm, will be assessed using the methodology outlined in Cadw's guidance 'The Setting of Historic Assets in Wales' (2017). Cadw agrees	The Applicant wrote to NCC on 6th March 2026 to confirm the proposed scope and methodology of the heritage setting assessments, but no response was received. As part of the heritage assessment, all designated historic assets within a minimum 3km radius of the Site have been subject to an appropriate and proportionate level of setting assessment in accordance with Cadw guidance. Selected assets have been progressed to Stages 2-4, and it has been demonstrated that parts of the Site contribute through setting to their significance, and that the Proposed Development may result in a degree of harm to that significance. Ms Williams' response is regarding the Grade II Listed Building of Little Creiggydd. This is one of the

			that the proposed methodology set out in the SR is appropriate. Cadw strongly recommends that the applicant consults Heneb: The Trust for Welsh Archaeology as well as the Local Authorities archaeological advisors, as to the need, extend and form of any additional archaeological evaluations that will be required to be carried out, in regard to the probable enclosure, identified in the geophysical survey. Cadw adds that the probable function and significance of this enclosure will need to be explained, along with the impact of the proposed solar farm on it, when the application for the development is determined. TCBC add that any assessments of impact upon specific heritage assets/landscapes will need to follow ASIDOHL (Assessments of the Significance of the Impact of the Development on the Historic Landscape) methodology. The assessment should also consider the impact upon the Twmbarlwm	selected assets that has been progressed to full, detailed setting assessment to understand the non-physical effects of the Proposed Development. It is beyond the technical scope and expertise of a heritage assessment to consider the potential for physical impacts (i.e. instability) arising from mechanical processes (i.e. pile driving). The Applicant consulted with Heneb over the course of 2025, to agree the scope and methodology of the heritage desk-based assessment and the geophysical survey; to agree the proposed mitigation by design for the probable enclosure identified by the geophysical survey; and to agree that no archaeological trial trench evaluation will be required either pre- or post-consent. The Applicant wrote to TCBC on 6th March 2026 to confirm the proposed scope and methodology of the heritage setting assessments, but no

			ancient monument, whilst likely to be low it is a matter to be considered. Given the above views of consultees, PEDW considers it to be premature to scope out Cultural Heritage and Archaeology. This topic is therefore scoped in depending on the results of the relevant assessments and views from Heneb.	response was received beyond an initial acknowledgement on 9th March 2026. ASIDOHL is deployed to when development is located within a Registered Historic Landscape, in order to assess the direct physical impact that development will have upon the asset. The present Site is not located within a RHL and so ASIDOHL is not required. The Twm-Barlwm Mound and Bailey Castle Scheduled Monument lies 8km to the west of the Site. Stage 1 setting assessment identified no potential for impact, and so it was scoped out of further assessment. On this basis, the Applicant considers that the scoping of built heritage within the ES is both necessary and proportionate, given the identified potential for setting effects on designated assets and the

				requirement for detailed assessment in accordance with Cadw guidance. In contrast, archaeological matters have been appropriately addressed through a programme of desk-based assessment, geophysical survey and consultation with Heneb, which has confirmed the nature and extent of archaeological interest within the Site and agreed that no further intrusive evaluation is required. The likely effects on archaeology are therefore well understood and can be suitably managed through embedded mitigation and standard planning controls, without the need for further assessment within the ES. Accordingly, the proposed approach reflects a proportionate EIA, focusing detailed assessment within the ES on those aspects of cultural heritage where there remains potential for significant environmental effects.

ID.26	Table 1 (5.19)	Risk of Major Accidents and Disasters	The applicant's attention is drawn to the fact that some solar panels are coated in PFAS (Per- and polyfluroalkyl substances) which can leach over time due to wear and tear. Should the panels proposed include this, appropriate measures need to be put in place to ensure that leaching of PFAS into the local environment does not occur and this should be address in a proportionate manner in the ES. In their response in Appendix 1, CSOG and S. Williams, raises concerns that should be addressed in the ES in terms of Risk and Major accidents. CSOG highlights the presence of a high-pressure gas main running through the site and a large water main crossing the site. PEDW advises the applicant to liaise directly with HSE and Dwr Cymru on this matter. Given these considerations, Risk of Major Accidents and Disasters is scoped into the ES, although not necessarily as a standalone chapter.	The Applicant notes the comment regarding the potential presence of PFAS (Per- and polyfluoroalkyl substances) in solar panels and the associated risk of leaching over time. The Applicant can confirm that the selection and specification of solar PV panels proposed as part of the Proposed Development do not contain PFAS. PFAS are fluorine-based chemical compounds, and none of the materials or components used in the composition of the solar panels contain fluorinated substances. As such, PFAS are not part of the panel materials or the manufacturing process. On this basis, there is no pathway for the release or leaching of PFAS from the proposed solar panels during the construction, operation or decommissioning phases of the Scheme. Consequently, no specific mitigation measures are required in respect of PFAS, and this matter is

				not considered to give rise to likely significant effects. In addition, utilities information and data for the Site has been sought (including gas mains, water/ sewage mains, electricity overhead and underground lines and telecoms) and the site layout has been designed accordingly and required buffers incorporated. The **Outline Construction Environmental Management Plan** sets out a construction methodology to ensure that all necessary stand-offs, protection measures and safe working practices are implemented. Risk of Major Accidents and Disasters is accordingly scoped out of the ES as a standalone chapter. A section setting out information on risk of major accidents and disasters is detailed at **ES Chapter 2 - EIA Assessment Scope and Methodology.**

ID.27	Table 1 (5.20)	Material Assets	It will be necessary to address Material Assets in a proportionate manner in relevant chapters. Material Assets is therefore scoped into the ES, although not necessarily as a standalone chapter.	The Applicant note the comment. Potential effects are considered proportionately across ES technical chapters/ appendices. The topic is therefore scoped into the ES but not as a separate chapter.
ID.28	Table 1 (5.21)	Waste	It will be necessary to address Waste in a proportionate manner in relevant chapters, especially given the decommissioning phase will be addressed in the ES. The CEMP should also be included as a technical appendix to the ES. Waste is therefore scoped into the ES, although not necessarily as a standalone chapter.	The Applicant note the comment. Potential effects are considered proportionately across ES technical chapters/ appendices, and an Outline CEMP. The topic is therefore scoped into the ES but not as a separate chapter
Landscape and Visual				
ID.29	6.1.14 – 6.1.44	Methodology	As suggested in the SR, the LVIA should be prepared in accordance with the Guidelines on Landscape and Visual Impact Assessment Third Edition (GLVIA3), NCC highlight that the Applicant should also consider the published Notes and Clarifications on the GLVIA3: https://landscapeinstitute.org/policypractice/	The LVIA has been prepared in line with GLVIA3 and other published guidance including clarifications and Technical Guidance Notes from the Landscape Institute. The full LVIA Methodology is included at **Appendix 5.1.**

			technical/assessments-standards/glvia3-panel/	
ID.30	6.1.45 – 6.1.46	Residential Visual Amenity Study and PRoW	TCBC disagree with the approach to scope out a Residential Visual Amenity Study and impact upon Public Rights of Way (PRoW). PEDW agree that these are important aspects that should be considered as these factors should have informed the siting of the proposed development. Furthermore, any PRoW diversion should be fully justified. A number of interested parties that responded to the consultation included concerns related too residential visual amenity. C. Thomas included in his response that the LVIA should include the effect of users of the footpath/lane network for amenity purposes in terms of their physical and mental wellbeing. (amenity benefits of the surrounding countryside). The applicant should liaise with relevant LPAs over the approach to the Residential Visual Amenity Study which should be included in the ES.	A separate Residential Visual Amenity Study has been conducted and appended to the **ES Chapter 5 – Landscape and Visual** as **Appendix 5.9**. This has assessed relevant residential receptors in the vicinity of the site as per the methodology outlined in the report. The RVAA has been prepared in line with guidance and best practice outlined in GLVIA3 and Landscape Institute TGN 02/2019. Visual effects on PRoW have been assessed through the visual assessment in the LVIA, and appropriate offsets have been designed into the layout of the proposed development to ensure effects are minimised where possible.

ID.31		Viewpoints	The Applicant should liaise directly with LPAs to agree viewpoints. Evidence of these discussions should be included in the ES. The applicant's attention is drawn to CSOG's response in Appendix 1, where they have included an independent Landscape ZTV of the area, which demonstrates concerns regarding the proposed viewpoints. They suggest that the viewpoints proposed in the SR do not include the most sensitive and impacted sites. C. Thomas has also provided the following comments in relation to viewpoints: • Location 9 in Appendix E needs to be divided by about 50yards to fully capture the view northwards and the view eastwards; • to capture the effect on the Candwr Brook valley, an additional viewpoint looking NE from the footpath exit at the rear of Pant-yr-eos farm; and the view in all directions from the middle of Field • Number 13, field gate and scale, needs an additional viewpoint here.	Viewpoints were agreed in discussion with all three LPAs, and additional views have been recorded from locations suggested both by the LPAs and third-party consultees. CSOG's ZTV showed less potential visibility than the original SZTV produced by the applicant that informed viewpoint selection. In addition, a LiDAR ZTV mirroring that of CSOG was produced to refine viewpoint selection. The SZTV and LiDAR ZTV are included in the report as **Figures 5.1 and 5.2** respectively. Additional viewpoints as requested have been selected and assessed where appropriate. Additional views that were not ultimately assessed in the Photoviews at **Appendix 5.7** have been included as Supplementary Views at **Appendix 5.8**.

			F. Bromfield raises concerns regarding impact on the character of the countryside, spoiling views from public rights of ways, and suggests that there should be key viewpoints from Llangybi Hill, the Usk Valley, and public footpaths to the north and east.	
ID.32		Photomontages	TCBC highlight the requirement to show photomontages including landscaping mitigations from base, year 5 and year 10 when landscaping has matured.	Photomontages for a select number of viewpoints have been produced as part of the LVIA at **Appendix 5.10**.
Ecology				
ID.33		Protected Sites	It is noted that TCBC state that the Impact on protected sites should be scoped in including potential impact of hydrological connectivity of the site with the River Usk SAC and the Severn Estuary. However, NRW agree with the reasoning to scope out the River Usk SAC/SSSI as set out in the SR. The applicant suggests that the water quality risks can be managed through appropriate stand-off from watercourses and adoption of standard good practice pollution control measures including a CEMP. PEDW concur with this approach and	As agreed during scoping; the River Usk SAC/SSSI is scoped out of the ES. However, for completeness and to provide confidence that the process has been followed for all relevant European sites the River Usk SAC has been included within the Information to Inform a Habitats Regulations Assessment (HRA). No main rivers are located within the Site. However, following advice from

			therefore the River Usk SAC/SSSI can be scoped out. NRW note that the sites/units of the proposed development are located either close to watercourses or on the sloping ground with various steepness and on average within 50m elevation, prone to erosion, sediment run-off and water pollution. NRW advise that a minimum buffer of 8m be left between proposed development and any main river. NRW acknowledge and welcome that a CEMP is proposed for the construction phase of development which we support, however, in addition they consider a Soil Management and Drainage strategy should be also in place for the operational phase of development. Any documents which contain mitigation measures to avoid significant effects should be included as technical appendices to the ES.	Monmouthshire County Council Flood Risk Team, a 7 m buffer has been applied to all ordinary watercourses within the Site, except in locations where watercourse crossings are proposed. An **Outline Soil Management Plan** and **Appendix 9.1 – Flood Consequence Assessment and Surface Water Drainage Strategy Report** are included within the application. Both documents will be updated to final position as part of detailed design and secured by condition and agreed with the Local Planning Authorities prior to commencement of development. The Severn Estuary SPA and Severn Estuary Ramsar Site are scoped into the Environmental Statement (ES), and information to inform a HRA has been provided. The information to inform the HRA is presented in **Appendix 6.8**.

			NRW welcome the intention to scope in potential impacts on the Severn Estuary SPA and Ramsar Site. It is noted that a Habitats Regulations Assessment with regards to the Severn Estuary SPA/Ramsar site is proposed. NRW advise that the HRA should be undertaken in relation to both terrestrial and marine protected sites having regard to both construction and operational stages of the proposed development. The Applicant's attention is drawn to NRW's comments in Appendix 1 regarding Habitat Connectivity and Resilient Ecological Network.	
ID.34		Protected Species	NRW advise that should protected species be confirmed, 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. NRW advise comprehensive descriptions of the habitats affected are included to support	**ES Chapter 6 – Ecology** provides the temporal nature of potential impacts on scoped in receptors. The ES chapter provides an assessment of the potential impacts on habitats that support ecological

			robust conclusions about their significance for the species. The applicant's attention is drawn to NRWs response in Appendix 1 for further advice regarding descriptions of affected habitats, favourable conservation status, site security of mitigation and compensation. NRW advocate that a conservation plan is prepared for relevant species and included as a technical Appendix to the ES. MCC note that whilst it is agreed that the operational impacts to many of the species associated with the watercourses on site can be scoped out EIA, there is potential for impacts during the construction phase through pollution events, this should be a consideration for the EIA.	receptors, including protected and notable species. No conservation plans have been assessed as required. Where relevant, the ES assesses the potential for pollution events to occur during the construction phase of the Proposed Development.
ID.35		Surveys	MCC highlight that where over 24 months have expired since the previous surveys were undertaken, update surveys will be expected to be submitted to inform the application unless sufficient justification can be provided.	The Applicant notes this comment - all surveys are currently in date.

ID.36		Local Biodiversity Interests	The Applicant should liaise with the local authorities in regard to Local Biodiversity Interests.	A biological record data request has been obtained from South East Wales Biodiversity Records Centre (SEWBReC) (Local Environment Records Centre (LERC) reference: 0256-148) and used to inform the assessment.
ID.37		Otter	NRW notes that the SR indicates that onsite watercourses and ditches have been assed as being suitable for otter use during the extended habitat survey and that no evidence of otter presence was identified in the surveys. NRW add that the scope of the surveys appears to have been limited. Whilst the SR proposes to scope otter out of the ES, unless results of surveys from September 2025 confirm otter presence, NRW advise that otter should be considered in the context of being an European Protected Species as well as a feature of the River Usk/ Afon Wysg Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI).	No signs/evidence of otter were recorded during the September 2025 surveys. Otter have been scoped in to **ES Chapter 6 – Ecology** for potential impacts during construction and decommissioning. Otter have been scoped out of the **ES Chapter 6 – Ecology** during operation as embedded mitigation measures, as detailed within the ES, will protect otter during operation. Deer fencing includes the provision for mammal gates; mammal gates will allow movement across the Site for otter and other mammals.

			NRW add that existing records show that otters are present in the Afon Lwyd (a tributary of the River Usk), which runs directly adjacent to Parcel 12 of the proposed development land. NRW also include in their comments that additional information is required in regard to the proposed deer-proof fencing as some do not allow for otter passage. NRW further advise that the impact assessment covers all stages of the proposed development on otters, including the potential for elements of the development to block or impede otter movement and subsequently increase road casualties.	
ID.38		Water Vole	NRW notes that the SR states that watercourses and ditches within the site were assessed as having suitability for water vole. No evidence of water vole presence was found; however, NRW advise that the scope of water vole surveys appears to have been limited to an inspection of areas likely to contain crossing points over water courses.	Surveys of crossing points, including 200m upstream and downstream of each crossing point, were undertaken. This is considered proportionate to the level of impact. Additionally, all watercourses within the Site that were hydrologically connected to a designated site for which otter is a qualifying feature

			Whilst the SR proposes to scope water vole out of the ES unless results of the September 2025 surveys confirm presence, NRW advise that as live sighting of a water vole exists on land directly adjacent to Parcel 8, the proposals have the potential to affect water voles and their habitats and NRW advise that this should be considered as part of any future assessment.	were surveyed. Consequently, all watercourses within the Site were surveyed. No signs of water vole or otter were identified during the surveys. One record of water vole was returned within the last 10 years, within 2km of the Site at the Boating Lake. The Site is hydrologically connected to the Boating Lake via the Afon Lwyd; however, the record is located approximately 4.3 km from the Site along the watercourse. Given that water voles do not typically range more than 200 m from the bank top, it is reasonable to conclude that, if the record relates to a water vole population, it is unlikely that this population are utilising the Site due to the considerable distance separating the two locations. The live sighting of water vole, raised by Natural Resource Wales (NRW),

				recorded adjacent to Parcel 8 is assumed to relate to the same record discussed between the Applicant and the LPA during the pre-consultation meeting, which was recorded at Court Farm Water Treatment Works in 2009. Given the age of this record, together with the absence of evidence during the current surveys, it is considered reasonable to conclude that water vole is no longer present within or adjacent to the Site.
ID.39		Dormouse	NRW notes that surveys found the hedgerows and woodlands within the site to have suitability for dormouse, however, no targeted dormouse surveys appear to be undertaken. The SR suggests that dormouse can be scoped out of the ES due to avoidance and mitigation measures, however, the report also suggests that some sections of hedgerow (potential dormouse habitat) would need to be removed to facilitate the development. It is noted that the quantity and location of	No confirmed records of dormouse were returned within 2km of the Proposed Development, in the last 10 years, by the local biological records centre. In addition, during pre-application consultation, the LPA advised that there are no known local populations of dormouse within the area. It is acknowledged, however, that this does not confirm the absence of dormouse.

			dormouse habitat clearance has not been confirmed. MCC add that if alterations to the scheme require the removal of sections of hedgerows it could result in significant delays in order to determine potential impacts to dormice. MCC also note the potential for operational impacts to dormice such as lighting. NRW advise that the proposals, along with breaks in habitat connectivity at hedgerow crossing points, have the potential to affect dormice and should be considered as part of any future assessments. Dormouse is therefore scoped into the ES.	It was agreed during pre-application discussions that, due to the minimal and localised nature of the proposed hedgerow loss, the precautionary assumption of dormouse presence would be adopted. Accordingly, precautionary working methods would be implemented during hedgerow removal to avoid adverse impacts on dormouse. Furthermore, the limited extent of hedgerow removal would not result in the loss of function of suitable habitat, fragmentation of habitat connectivity, or severance of dormouse populations, should the species be present. Dormouse has been scoped into **ES Chapter 6 – Ecology**, as requested by NRW.
ID.40		Bats	The SR states that there are trees within the site that offer suitable habitat for roosting bats. NRW agree with the approach to scope	Ground Level Tree Assessments have been undertaken on all areas of proposed vegetation clearance and a 5m buffer. Trees with suitability to

			in foraging and commuting bats for construction and operation. PEDW acknowledges MCCs stance that surveys prior to determination can be scoped out, however, PEDW's stance is that to properly establish the baseline, once it has been identified which potential roosts may be affected, surveys should be undertaken and included as part of the ES at the point of submission. NRW highlight that lighting during construction of the development, as well as lighting at the proposed permanent substation compound, has the potential to impact on bats and their tree roosts. Therefore, roosting bats should also be scoped into the Environmental Statement.	support bats have been identified. All PRF-M trees have been avoided and those classified as PRF-I will be subject to soft-felling under ecologist supervision. Assessments of bats is found at **ES Chapter 6 – Ecology**.
ID.41		Ornithology	It is noted that breeding and non-breeding birds are to be scoped into ES. NRW and MCC welcome the approach to breeding birds and advise details of appropriate mitigation, compensation, and enhancements for any likely	Enhancement measures for birds have been included within the ES and **Outline Landscape and Environmental Management Plan** and this includes enhancement measures for barn owl.

			significant effects identified should be provided along with appropriate enhancements. The applicant's attention is drawn to NRWs comments in Appendix 1 for further detail particularly regarding enhancements for Barn Owl. MCC agree that the non-breeding bird surveys should inform the impact of the operational scheme on Severn Estuary RAMSAR and SPA features. TCBC highlight that the glint and glare assessment should also assess flight path of bats and birds.	The Severn Estuary SPA and Ramsar site have been scoped into **ES Chapter 6 - Ecology** and included within the Information to Inform a HRA (**Appendix 6.8**). It has been hypothesised that the glare from photovoltaic panels can result in birds confusing a solar farm for a lake, which could affect waterbirds passing overhead by attracting the birds, potentially disrupting migration or leading to collision. However, although this may occur in certain arid areas, a research review did not find strong evidence for the 'lake effect hypothesis' (Anderson et al, 2025). Furthermore, the panels themselves would have a non-reflective coating and would have fixed tilt to the south, which would limit the occurrence of glare As detailed within **Chapter 4 – Proposed Development and Alternatives** no permanent lighting

				would be required across the Site; temporary mobile task lighting may be required for maintenance during periods of low light, however, this would be brought onto Site for short periods of time and would not be used routinely. The substation would have inward facing security lighting installed. This would be operated with passive infrared detectors or would be turned on manually for maintenance in low light conditions or in the event of an emergency. As a result, artificial lighting levels will remain low and intermittent. Therefore, significant glint and glare effects are not anticipated, and no adverse effects on bats are predicted as a consequence of the proposed lighting scheme. A sensitive lighting strategy would be secured via the **Outline Construction Environmental Management Plan** ensuring that features of value for foraging and

				commuting bats are not subject to additional lighting during the operational lifetime.
Glint and Glare				
ID.42		Glint and Glare	NCC and PEDW agree with the approach set out in the SR. CSOG highlight the potential impact of glint and glare on helicopters landing at the Grange Hospital. F. Bromfield highlights that seasonal variation and glint/glare implications for nearby dwellings and road users should be considered in the assessment.	The Applicant notes the comment. Helicopters landing at the Grange Hospital helipad are assessed in **ES Chapter 7 – Glint & Glare**. Additionally, the assessment accounts for the potential difference in vegetation screening levels throughout the year.
Agricultural Circumstances				
ID.43		Agricultural Land Classification (ALC) and BMV Policy	NCC agree with the approach to assess agricultural impact. LQAS advise that they have previously engaged with the applicant's surveyor to agree the methodology for the ALC survey. LQAS confirm that the areas agreed have been surveyed in detail.	The **Agricultural Land Classification Survey** (**Appendix 8.1**) has been validated by LQAS and therefore form an agreed basis for assessment of the effects on land quality. The Welsh Government's Land Quality

			The Applicant's attention is drawn to LQAS comments in Appendix 1 regarding compliance with BMV policy. BMC agricultural land is scoped into the assessment.	Advice Service (LQAS) comments in respect of policy in Planning Policy Wales and the Dear Chief Planning Office (DCPO) letter of 1st March 2022 are noted and are addressed in **ES Chapter 8 – Agricultural Circumstances**, in particular 8.2 and 8.4.
ID.44		Infrastructure and potential impacts on soil functions	LQAS highlight that the type, location and level of infrastructure proposed as part of the development will need to be fully detailed for the assessment. The Assessment should include detailed information on the total number, depth and spacing of piles installed; the extent of cable trenching and if any imported fill materials used (e.g. cement bound sand), track extent type and location, inverter pads number and locations and areas for construction compounds, etc. LQAS add that the assessment will need to provide detailed information on the methodology for the installation and decommissioning of the infrastructure and,	The comments of LQAS are noted. The potential effects on soils and agricultural land quality as a result of the construction works are considered in depth in **ES Chapter 8 – Agricultural Circumstances**. This includes a description of the construction, operation and decommissioning phases and works.

			considering the soils on site, how any likely impacts have been assessed and avoided.	
ID.45		Soils	LQAS highlight that the proposal is likely to have significant impact upon the important services of mineral, organo-mineral and peat soils and functions and therefore must be assessed. LQAS require a soil management scheme to be prepared by the applicant which is informed by the baseline and considered as part of the ES process. LQAS disagrees with the applicant's statements regarding soil impacts and reversibility of the development at decommissioning as this is not evidenced. Therefore soils, soil functions and services are scoped into the assessment.	The potential for adverse effects on soils is considered in detail in **ES Chapter 8 – Agricultural Circumstances**. This draws on detailed information about soils derived from the ALC and soils mapping. In addition, an **Outline Soil Management Plan** is provided with the application, setting out best practice to minimise the effects of the construction, operation and decommissioning phases on soils.