

# Green Infrastructure Statement

DOC 11

Development of National Significance

## Alaw Môn Solar Farm

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

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## **1. INTRODUCTION**

- 1.1 This Green Infrastructure Statement has been prepared on behalf of Wylfa Green Limited (“The Applicant”) to accompany a Development of National Significance (DNS) application to the Welsh Ministers for the proposed installation of a solar farm, with a generating capacity of approximately 160 Mega-Watts (MW), and energy storage facility with associated infrastructure, works and access (“the Proposed Development”) on land west of the B5112 and land located 415 m to the south of Llyn Alaw, 500 m to the east of the small hamlet of Llantrisant, and 1.5 km to the west of the village of Llannerch-y-Medd, Anglesey (“the Site”). The Site is located within the administrative area of the Isle of Anglesey County Council (IACC), with the DNS application to be made to Planning and Environment Decisions Wales (PEDW).
- 1.2 The Green Infrastructure Statement is prepared with inputs from BSG Ecology.
- 1.3 This Green Infrastructure Statement first provides an overview of the Site and Proposed Development (Section 2), before detailing relevant considerations on policy, Biodiversity Net Benefit and the ‘DECCA framework’ alongside the step-wise approach (Section 3), a Green Infrastructure Assessment is then undertaken detailing how green infrastructure has been considered and applied in the development of the Alaw Môn Solar Farm proposals (Section 4) with the Green Infrastructure Statement then concluded (Section 5).
- 1.4 The Green Infrastructure Statement has been prepared in the context of Planning Policy Wales (ed. 12, February 2024) requiring (paragraph 6.2.12) that such a statement “should be submitted with all planning applications”.

## **2. THE SITE AND PROPOSED DEVELOPMENT**

### **The Site**

- 2.1 Alaw Môn Solar Farm is located near Llantrisant on the Isle of Anglesey in North Wales and extends to approximately 268 hectares (ha) of land.
- 2.2 The Site is located approximately 500 m to the east of the small hamlet of Llantrisant and approximately 1.5 km to the west of the village of Llannerchy-medd. It is also to the west of the B5112.
- 2.3 The Site is irregularly shaped. Within the central part of the Site, several farm houses and associated buildings at Nantanog are present, which are encompassed by, but located outside of, the Site boundary.
- 2.4 The Nantanog Site of Special Scientific Interest (SSSI) is designated for its nationally important geological exposure and is partly within the Site boundary. The Site is approximately 415 m south of Llyn Alaw, which is designated as a SSSI. A Local Wildlife Site (LWS), Cors y Bol, is present in the western part of the Site.
- 2.5 The Site boundary is adjacent to the Scheduled Monument at Cors-y-Bol Round Barrow on the north-western Site boundary. The Site is also approximately 1.3 km to the west of the Scheduled Monument at Y Werthyr Iron Age Hillfort.
- 2.6 The Site comprises approximately 55 individual land parcels in predominantly pastoral agricultural use, being currently utilised for grazing purposes. Some of the agricultural fields are bound by hedgerows. The cable route predominantly forms the public highway to the point of connection at the National Grid Wylfa substation.
- 2.7 The Site is intersected by three Public Rights of Way (PRoW) and the National Cycle Route (NCR) 5 is adjacent to the Site. Other PRoW are nearby to the Site.
- 2.8 The Site is further described within the Environmental Statement and accompanying reports.

### **The Proposed Development**

- 2.9 The DNS application is submitted for:

“Construction of a ground-mounted solar photovoltaic farm and associated energy storage facility, together with associated landscaping, works, infrastructure and access”

- 2.10 It is anticipated that the electricity generating capacity of the Proposed Development would be approximately 160 MW. All associated plant and equipment together with associated development (such as cabling, CCTV and fencing) is included within the proposals. An energy storage facility and 132 kV Substation also forming part of the Proposed Development. The proposal would operate for a time limited period of up to 40 years prior to decommissioning.
- 2.11 The Proposed Development will connect to the electricity network via the National Grid Substation at Wylfa Nuclear Power Station.
- 2.12 The Proposed Development is further described within the Environmental Statement and accompanying reports.

### **3. BACKGROUND POLICY, BIODIVERSITY NET BENEFIT, THE ‘DECCA FRAMEWORK’ AND THE STEP-WISE APPROACH**

#### **Planning Policy Wales**

3.1 Planning Policy Wales (ed. 12, February 2024) details at paragraph 6.2.12-15 that:

*“A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal... The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step wise approach has been applied.*

*There are multiple ways of incorporating green infrastructure, depending on the needs and opportunities a site presents, and the green infrastructure assessment should be referred to, as appropriate, in order to ascertain local priorities ...*

*Development proposals should be informed by the priorities identified in green infrastructure assessments and locally based planning guidance ...”.*

3.2 This Green Infrastructure Statement is provided in the context of the PPW and details the relevant considerations on green infrastructure.

#### **Other Policies and Plans**

3.3 IACC does not currently have adopted or standalone green infrastructure plan(s) or supplementary planning documentation/guidance, of the style detailed within the PPW, but will likely develop such details as a replacement Joint Local Development Plan is prepared. No green infrastructure areas are designated. Details within the current Joint Local Development Plan (July 2017) and supporting maps approach considerations of green infrastructure and, for example, constraint maps detail sensitive areas for protection and enhancement which are of relevance.

3.4 While not using the term “green infrastructure” policies consistent with the approach is also in line with the Anglesey and Gwynedd Joint Local Development Plan Policy AMG 5 which states that “Proposals must protect and, where appropriate, enhance biodiversity that has been identified as being important to the local area”. The Development will also “protect, retain or enhance trees, hedgerows or woodland”, as required by strategic Policy PS 19.

- 3.5 The Council has a corporate biodiversity plan (2021 – 2022) which mostly relates to Councils duties and proposed biodiversity actions in their own activities.
- 3.6 Additionally, the Council have a Local Biodiversity Action Plan (2002/2003) which while dated remains of relevance. The landscape strategy includes the protection, enhancement and/or creation of habitats that are included within the Anglesey Biodiversity Action Plan (including scrub, woodland, ponds, hedgerows, cloddiau); the proposed habitat measures are likely to benefit local priority species referred to in the Anglesey Biodiversity Action Plan (including barn owl, song thrush, great crested newt and bats, such as noctule and common pipistrelle).

#### **Natural Resources Wales Area Statements**

- 3.7 Planning Policy Wales (ed. 12, February 2024) details at paragraph 6.2.6 that:

*“Green Infrastructure Assessments should also draw from the evidence base provided by NRW’s Area Statements and Nature Network Maps, Well-being Assessments and locally and regionally collected green infrastructure data and mapping already underpinning local authority approaches to green infrastructure... The Green Infrastructure Assessment and outcomes should also be given early consideration in development proposals, and inform the design and implementation of projects”.*

- 3.8 To apply this policy to the proposed development, relevant locally-based planning guidance about green infrastructure, including any priorities identified in available Green Infrastructure Assessments is presented below, together with reference to strategic level guidance available from Natural Resources Wales (NRW).
- 3.9 The North West Wales NRW Area Statement covers the Alaw Môn Solar Farm Site and wider Anglesey area, Conwy and extending southwards to encompass much of Snowdonia (‘Eryri’) National Park.
- 3.10 The Area Statement process is detailed through work undertaken by NRW since 2018 and a series of engagements events with various stakeholders held to develop themes for further consideration. Two cross cutting themes during the development of the Area Statement identified were ‘ways of working’ and ‘climate and nature emergency’. A series of maps provide details on broad habitats, protected areas and national forest inventory are provided. Other relevant factors such as demographics and deprivation are also mapped. The ‘ways of working’ and ‘climate and nature emergency’ themes detail ways in the themes are being considers by NRW and local stakeholders, detailing amongst other matters, what success may

look like and how sustainable management of natural resources may be actioned aligning with policy and aspiration.

### **Biodiversity Net Benefit and the 'DECCA framework'**

- 3.11 The Section 6 Environment (Wales) Act 2016 requires planning authorities to seek to maintain and enhance biodiversity in the exercise of their functions. This means that development should not cause any significant loss of habitats or populations of species (not including non-native invasive species), locally or nationally and must work alongside nature and it must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems.
- 3.12 A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and long-term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site. The step-wise approach (outlined below) is the means of demonstrating the steps which have been taken towards securing a net benefit for biodiversity. In doing so, planning authorities must also take account of and promote the resilience of ecosystems, in particular the following attributes, known as the DECCA Framework. DECCA refers to:
- Diversity,
  - Extent,
  - Condition,
  - Connectivity; and
  - Adaptability to change.

### **Step-wise approach**

- 3.13 A step-wise approach is required to demonstrate the steps which have been taken towards securing a net benefit for biodiversity; in summary this involves avoiding and retaining important features, minimising impacts, ensuring that habitat connectivity and favourable conservation status of species is maintained, providing additional mitigation, and building in ecosystem reliance to deliver a net benefit. This approach is illustrated in Figure 1 (PPW, ed 12., February 2024).





Figure 1. Step-wise approach.

#### 4. GREEN INFRASTRUCTURE ASSESSMENT

4.1 Tables 4.1 and 4.2 demonstrate how the step-wise approach, to securing a net benefit to biodiversity, has been integrated into the project design and explains how the DECCA principles have been achieved.

4.2 Table 4.1 details relevant considerations to the step-wise approach.

Step-wise approach	How this has been integrated
Involves avoiding and retaining important features	<p>Statutory designated sites have been avoided. Nantanog SSSI, which is within the Site, is avoided and protected with buffers, which have been discussed and agreed with NRW. Other SSSIs are more distant and will not be affected. Cors y bol Local Wildlife Site (LWS) is adjacent to the Site; this has been avoided and development is separated from the Site by a buffer areas. Further details are set out in the Environment Statement (ES) Chapter 8.</p> <p>Baseline surveys within the Site (as detailed in the ES Chapter 8) have been used to identify habitats within the Site, the majority of the site includes species poor, heavily grazed grassland.</p> <p>Existing ecological features (hedgerows, woodland, wetland habitat and scrub) within the Site have been retained and incorporated into the design of the Development; impacts on these features will be avoided.</p>
Minimising impacts	<p>An Ecological Impact Assessment has been carried out (as detailed in the ES Chapter 8), which has identified mitigation requirements. These measures involve inherent design mitigation (including a 50m-wide buffer to Pond 11 to provide an open area of grassland for birds around the pond, which will be grazed/mown on a regular rotation, to maintain short-sward, open habitat conditions suitable for grazing wildfowl. The nearest solar PV panels will be over 50m from the edge of the pond), and also habitat creation (which is discussed in more detail below).</p>
Ensuring that habitat connectivity and favourable conservation status of species is maintained	<p>New habitats will be created (woodland, grassland, scrub, and ponds) throughout the Site, around the proposed solar PV arrays (the areas are described in Table 4.2 below and shown in the accompanying Drawings).</p> <p>This will increase the diversity of habitats within the Site and will provide habitats for a variety of species including birds, bats, great crested newt and amphibians.</p> <p>Additional ponds will be created, in clusters, surrounded by areas of longer grassland and scrub, which will increase the suitability of the Site for amphibians, increase the network of ponds available. These habitats will be managed to ensure they reach the desired condition and maintain their value for wildlife for the 40 year lifespan of the Development (as detailed in the Outline Landscape and Environment Management Plan (LEMP)).</p> <p>The Development’s landscape strategy has been designed to buffer and reinforce the existing features, and to improve habitat connectivity within the Site.</p>

Step-wise approach	How this has been integrated
	To help understand the degree of habitat improvement incorporated into the scheme, an indicative Biodiversity Net Gain calculation has been carried out (as detailed in the Alaw Mon Biodiversity Gain Assessment). The indicative assessment concluded that, post-development, there will be a significant increase in habitat units (197.77 habitat units; a 31.94 % gain in habitat units) and a significant increase in hedgerow units (24.17 units; a 41.53 % gain in hedgerow units).
Providing additional mitigation	It also includes precautionary mitigation to avoid impacts on protected species including: timing of construction work to avoid impacts on nesting birds, and wintering birds, precautionary measures to avoid the risk of impacts on great crested newts (a very small population is present in one pond), and timing of ongoing management operations. Bat boxes, bird boxes, hibernacula will also be incorporated into the design and maintained.
Building in ecosystem reliance	Given that the Development's landscape strategy has been designed to buffer and reinforce the existing features, and to improve habitat connectivity within the Site it is therefore considered likely to also increase ecosystem resilience within the Site, by increasing habitat area, linkages and opportunities for wildlife in various areas of the Site.

Table 4.1: Step-wise approach.

- 4.3 Table 4.2 details considerations of the DECCA attributes and how the principles have been achieved.

DECCA attributes	How these has been achieved within the Development's design
<i>Diversity</i> : underpins biodiversity, resilient ecosystems, their functioning and the delivery of ecosystem services. More diverse ecosystems are more resilient to external influences. Strategic planning and individual development proposals should avoid negative impacts on biodiversity by considering how biodiversity assets can be maintained and enhanced	The fields within the Site support heavily-grazed improved grassland or species-poor semi-improved grassland. This grassland will be retained within the solar PV arrays, other areas of the Site will be protected and enhanced through the Development's landscape strategy. Existing ecological features (hedgerows, woodland, wetland habitat and scrub) within the Site have been retained and incorporated into the design of the Development. New habitats will be created (woodland, grassland, scrub, and ponds) throughout the Site, around the proposed solar PV arrays. This will increase the diversity of habitats within the Site.
<i>Extent</i> : strategic planning and individual development proposals must avoid loss in the extent of biodiversity and incorporate	The landscape strategy for the Development has been designed to complement and strengthen the existing ecological features, which are largely defined by field

DECCA attributes	How these has been achieved within the Development's design
<p>measures to appropriately maintain and enlarge existing habitats, through habitat restoration and creation with adjoining and nearby areas, green infrastructure features and networks.</p>	<p>boundaries and adjacent features around the Site's periphery. These features are buffered within the design, throughout the Site with new areas of habitat; linkages between habitats both within and around the Site will be improved. Examples of improvements are given within the bullet points below. Given the scale of the Development, this means that the design will include:</p> <ul style="list-style-type: none"> <li>6.21 ha of new woodland planting,</li> <li>1.69 ha of new native scrub planting,</li> <li>6.85 ha of meadow grassland,</li> <li>52.59 ha Grassland around the perimeter develop a taller sward, with some tussocks allowed to develop,</li> <li>4,304 m of additional hedgerow (both infilling gaps and new sections of hedgerow),</li> <li>14 (0.23ha) of new ponds and wetland/marginal vegetation.</li> </ul> <p>Existing grassland will be retained within the solar PV arrays.</p>
<p><i>Condition:</i> Ecosystems and biodiversity assets need to be in a healthy condition to function effectively, to deliver a range of important ecosystem services and be more resilient to external influences. Good condition requires sufficient scale and functioning natural processes or appropriate management to provide structural complexity and sustain diverse mosaics of habitats. Strategic planning and individual development proposals must not compromise the condition of ecosystems. Planning for and securing the long-term management of retained habitats is key to maintaining condition.</p>	<p>Ecological features adjacent to the Site will be buffered from the Development, and new habitats (meadow grassland and scrub) to be created in these areas, which are currently heavily grazed pasture. The buffer areas around the retained features will therefore improve in ecological condition through the implementation of the Development's landscape strategy. Additional ponds will be created, in clusters, surrounded by areas of longer grassland and scrub, which will increase the suitability of the Site for amphibians, increase the network of ponds available. These habitats will be managed to ensure they reach the desired condition and maintain their value for wildlife for the 40-year lifespan of the Development. Details will be set out in the Outline LEMP.</p>
<p><i>Connectivity:</i> take opportunities to develop functional and physical connectivity of biodiversity and ecological networks within and between ecosystems and across landscapes, building on existing connectivity and quality and encouraging habitat creation, restoration and appropriate management, Individual development proposals should</p>	<p>The Development's landscape strategy has been designed around the existing ecological features, which are largely defined by field boundaries and adjacent features around the Site's periphery. These features are buffered and strengthened within the design (i.e. hedgerow gapping up, new hedgerows, and creation of meadow grassland in buffer areas adjacent to field boundaries) meaning that linkages between habitats both within and around the Site will be improved.</p>

DECCA attributes	How these has been achieved within the Development's design
<p>identify and incorporate measures which enable appropriate links to be made between the site and its surroundings so as to improve connectivity.</p>	<p>Additional ponds will increase the suitability of the Site for amphibians, by increasing the network of high-quality ponds available.</p> <p>The most suitable habitat for birds is primarily restricted to the field boundaries; the creation of new hedgerows and buffering of existing hedgerows with meadow grassland, together with new woodland and scrub planting, will increase the value of the Site for birds and a range of other wildlife through the provision of additional foraging resources and cover.</p>
<p><i>Adaptability to change:</i> resistance and recovery from pressures arise when the attributes of ecosystem resilience – diversity, extent, condition and connectivity of ecosystems - are in good condition. Strategic planning and individual development proposals should identify impacts to the ecosystem resilience attributes of biodiversity</p>	<p>The Development's landscape strategy has been designed to buffer and reinforce the existing features, and to improve habitat connectivity within the Site. It is therefore considered likely to also increase ecosystem resilience within the Site, by increasing habitat area, linkages and opportunities for wildlife in various areas of the Site.</p>

Table 4.2: DECCA attributes

- 4.4 An Outline LEMP has been prepared and accompanies the DNS application which sets out the management and monitoring will be carried out over the 40 year life of the scheme. Implementation of a Final LEMP, via Condition, will ensure that the habitat and landscape enhancements are delivered as proposed, and the management is review and adjusted as required.
- 4.5 The Landscape Strategy is detailed within the accompanying drawings.

## 5. CONCLUSION

- 5.1 This Green Infrastructure Statement has been prepared to support the installation of a solar farm, with a generating capacity of approximately 160 Mega-Watts, and energy storage facility with associated infrastructure works and access on land west of the B5112 and land located 415 m to the south of Llyn Alaw, 500 m to the east of the small hamlet of Llantrisant, and 1.5 km to the west of the village of Llannerch-y-Medd, Anglesey, Anglesey.
- 5.2 This document provides in sufficient detail relevant considerations on policy, Biodiversity Net Benefit and the 'DECCA framework' alongside the application of the step-wise approach taken in the development of the Alaw Môn Solar Farm proposal.
- 5.3 In summary, as demonstrated above step-wise approach has been followed and the principles of the 'DECCA framework' have been achieved within the Alaw Môn Solar Farm design: the landscape strategy has been designed to improve habitat connectivity within the Site, through protecting existing habitat features, and enhancing these through strengthening hedgerows, providing additional connected areas of scrub, grassland and ponds within the layout. These features will be managed and monitored out over the 40 year life of the scheme. The approach is considered to align closely with the requirements of Planning Policy Wales (ed. 12, February 2024).
- 5.4 This approach is also in line with the Anglesey and Gwynedd Joint Local Development Plan Policy AMG 5 which states that; "Proposals must protect and, where appropriate, enhance biodiversity that has been identified as being important to the local area". The Development will also "protect, retain or enhance trees, hedgerows or woodland", as required by strategic Policy PS 19.'
- 5.5 The Planning Policy Wales objectives are considered met.
- 5.6 It is therefore concluded this Green Infrastructure Statement, prepared in in the context of Planning Policy Wales, has provided in proportionate detail the approach taken in the development of the Alaw Môn Solar Farm proposals through consideration of the step-wise approach and Green Infrastructure Assessment.



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