

Agreed Natural Resources Wales Meeting Notes

Development of National Significance
Pre-Application Consultation

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

October 2023



Alaw Môn Solar Farm: Natural Resources Wales (NRW) DPAS meeting

BSG Project Ref: P20-947

23 June 2021, 3-5pm (via Teams)

Attendees:

Rhys Jones (NRW, Planning Case Officer)
Raymond Roberts (NRW, Lead Policy Advisor: Geodiversity)
Matthew Ellis (NRW, Senior Species Officer)
Patrick Lindley (NRW, Ornithologist)
Rob Styles (Enso Energy, Project Developer)
Guy Miller (BSG Ecology, Principal Consultant Ecologist)
Roger Buisson (BSG Ecology, Associate Director (Ecology))
Ben Lewis (Barton Willmore, Infrastructure and Energy Planning Consultant)
John Markwell (Barton Willmore, Landscape Architect)

Minutes

1. Project background

Rob Styles, Enso Energy, gave an overview of the project:

Alaw Môn Solar Farm (the 'Site') is located in the centre of Anglesey to the east of Llantrisant village, centred at Ordnance Survey (OS) grid reference SH 38304 83896.

The Site is approximately 300 hectares in extent. The proposed development is a ground-mounted solar photovoltaic (PV) farm and energy storage facility, together with associated infrastructure.

The array locations are not currently fixed; however initial layout designs are being devised to take account of ecological constraints including designated sites (see below) and existing habitat features including hedgerows, scrub, ponds, and watercourses.

The grid connection route would utilise the existing highway and therefore is unlikely to give rise to any significant ecological impacts.

Guy Miller, BSG Ecology, provided an overview of the ecological character of the Site:

The Site supports large areas of improved grassland, with some localised areas of acid, neutral and marshy grassland. Fields are typically separated by hedgerows with field boundary trees and fences; ditches and walls are also present.

To the west of the Site boundary (outside the Site) is an area of fen, marshy grassland and scrub that forms part of the Cors-y-Bol Local Wildlife Site (LWS). Within the Site boundary is the Nantanog Site of Special Scientific Interest (SSSI), a geological SSSI, and c. 400m to the north of the Site is Llyn Alaw SSSI, which is a large mesotrophic open waterbody.

Ponds are present within the Site and in the surrounding landscape (initially c.30 ponds were identified within the Site boundary and a 250m radius beyond

	<p>this during the desk study); the ponds are quite variable, including small field ponds and larger constructed fishing ponds.</p> <p>The survey work to date has involved:</p> <ul style="list-style-type: none"> • Extended Phase 1 habitat survey (spring summer 2020/21) • Great crested newt survey (spring summer 2020/21): Habitat Suitability Index Assessment (HSI) of all accessible ponds within 250m; eDNA survey of all ponds capable of being sampled within 250m of Site. A positive eDNA result was returned for one pond (Pond 7), this was subject to a Population Class assessment survey: one GCN recorded on one visit. • Bird survey – Breeding bird characterisation survey (three visits, April, May, June 2020) • Wintering survey – Nine visits October 2020-March 2021. • Desk study via Cofnod.
<p>2. Scoping response</p>	<p>NRW has provide a scoping opinion, via letter, dated 14 June 2021. The extracts below are key points from this letter that relate to ecology:</p> <ul style="list-style-type: none"> • <i>“The EIA for this development should include sufficient information to enable the determining authority to determine the extent of any environmental impacts arising from the proposed scheme on legally protected species.”</i> • <i>“With respect of Great Crested Newts, we advise that traditional surveys should be used to compliment eDNA surveys. A negative eDNA result should not be used to state that the species is absent.”</i> • <i>“The Nantanog SSSI lies within the development boundary, and has been designated for its geological interest.”</i> • <i>“The development is 423m from Llyn Alaw SSSI, which includes several species of over-wintering wildfowl; including whooper swan, shoveler and teal, and breeding tufted duck as its notified features.”</i> • <i>“The proposal has the potential to impact on mobile features (e.g. birds) of protected sites. We advise that any planning application should assess whether the proposed site is used (e.g. for feeding) by birds that form part of a designated feature of a SSSI or SPA i.e. assess whether the site is functionally linked to a SSSI/SPA. The ornithological survey work to date appears appropriate but more details regarding timing and results are required before it can be concluded whether further survey is required.”</i> • <i>“Greenland White-fronted Geese.. have been known to use fields in the vicinity of Llyn Alaw. We would therefore recommend that this is considered within the EIA.”</i> <p>These points were considered at the meeting, and a summary of the discussions is set out below.</p>

<p>3. Geology / Nantanog SSSI</p>	<p>Nantanog SSSI, a geological SSSI, runs through the Site. The SSSI is a narrow deep ravine with rock exposures.</p> <p>A fence line is proposed at the top of the ravine. There will be no infrastructure within the SSSI boundary. A buffer will be incorporated into the design. Providing that there is a sufficient buffer, and no physical work within the ravine or SSSI boundary, NRW does not have concerns in relation to impacts on the SSSI from the construction work. A 10m-wide buffer from the boundary of the SSSI was suggested, this was considered to be acceptable by NRW (Raymond Roberts).</p> <p>Raymond Roberts (NRW) advised that gorse and scrub encroachment is already an issue, as this obscures the interest features, and that fence could prevent grazing of the SSSI, which may lead to further scrub encroachment.</p> <p>An issue for design and site management would be to demonstrate how grazing could be maintained within the SSSI (it is currently grazed, but with the proposed fencing this could be prevented) and/or how scrub encroachment could be managed to maintain sufficiently open conditions. This would need to be picked up in the landscape environmental management plan.</p>
<p>4. Ornithological survey, report and assessment</p>	<p>The aim of the bird survey work was to a) characterise the breeding and wintering bird assemblage using the Site, and b) to identify whether there is evidence to suggest wildfowl species, for which the nearby Llyn Alaw SSSI is notified, use the Site.</p> <p>Guy Miller provided a summary of the work completed to date, which included visits to Llyn Alaw SSSI (the southern part of the Lake that lies closest to the Site).</p> <ul style="list-style-type: none"> • The breeding bird assemblage is mainly associated with scrub, hedgerows, and woodland. Very few birds nest in the open fields (two skylark territories and four meadow pipit territories were recorded across the entire site). • Whooper swan has not been recorded during the winter survey work. • Little activity (flocks of wintering birds, wildfowl) has been recorded from the majority of the Site. • Wildfowl have been recorded from a shallow pool near Nantanog: most species in small numbers, including teal (typically <8, but up to 15), but no shoveler; some larger numbers (c. 100+) of wigeon in the pool and margins. <p>Patrick Lindley stated the survey work sounded adequate in principle but that NRW would want to see breeding bird survey methods in further detail – a report is being prepared which will be provided to NRW in due course.</p>

	<p>NRW specified that they would like to have confidence in the survey and assessment work and its conclusions, and in particular would like to be able to scope out issues relating to:</p> <ul style="list-style-type: none"> Greenland white-fronted goose; NRW recommended that Dr Rachel Taylor (from the Echoes project/BTO) was consulted, as they are involved in a GPS satellite tagging project in Anglesey; and may have information that is relevant to the assessment. [NB consultation with Dr Taylor has taken place, 6/7/21; and the data gathered has been requested from the Echoes project so that it can be considered by the assessment; a summary of the outcome of this meeting can be provided to NRW once the record is accepted by all parties]. Chough; NRW recommended that Adrienne Stratford/Tony Cross was consulted, as she holds a database of chough records, including inland records for Anglesey). The purpose of this additional consultation would be to increase confidence in the assessment and rule out possible functional habitat links with Holy Island Coast SPA. [NB consultation with Adrienne Stratford has now taken place 6/7/21; no chough records are held for the development area or immediately surrounding areas. There are generally very few records from the “interior” of Anglesey, away from Parys Mountain and Llyn Traffwll]. Barn owl; details of survey work carried out and whether further specific survey is considered to required based on the risk of displacement disturbance to nesting birds, given legal protected afforded to nesting birds. [NB There are a few local records of this species, including a nest (2012) from a building c. 900m to the south; and a roost (2015) on the north side of Llyn Alaw. Most records date from 2005 and 2007, including two sightings within the Site. Habitat suitability for barn owl within the Site is considered to be limited by the lack of rough grassland habitat. No evidence of barn owl was recorded during the survey. There are buildings in the wider landscape, beyond the Site boundary, which have potential to be used by nesting barn owl, including the disused farm buildings at Nantanog. Further detail will be provided in the bird report]. <p>Action: GM to send draft Bird Survey Technical Report to NRW for comment.</p>
<p>5. Great crested newt eDNA survey</p>	<p>The NRW scoping response states: <i>“A negative eDNA result should not be used to state that the species is absent.”</i></p> <p>Given that this advice appears to vary from NRW published guidance in respect of eDNA and GCN and EPS Licensing, further clarification was sought from NRW in advance of the meeting: Rhys provided this via email on 15 June 2021:</p> <p><i>“Matt Ellis, our senior species advisor has responded to your query this morning and says:</i></p>

FYI - I have been chairing the Wales Amphibian and Reptile Link meeting today. Perhaps unsurprisingly eDNA was raised again. The below link from c.2014 was uploaded into NRW website. Since then, we have been reviewing the use and applications of eDNA. Revised guidance has been published and is awaiting publication on our website. We advise that eDNA surveys are undertaken in combination with the traditional survey techniques. Consequently, the below statement [i.e. the statement in the scoping opinion letter 14 June 2021] is correct. I advise that we could suggest that if uncertainties exist, the scheme is designed on a presumed precautionary basis with surveys in 2022 used to inform the detail"

Guy Miller explained that the eDNA survey work has returned negative results for all accessible ponds surveyed, except for one (Pond 7); where population class assessment survey has been subsequently completed: during six visits, one great crested newt was recorded at this pond, indicating a very small population within the Site. Many of the ponds within the Site and in the adjacent land have low scores based on Habitat Suitability Index assessment (i.e. they have poor suitability for great crested newt), and the negative eDNA results are considered to correspond with the HSI results.

NRW's current published policy is that eDNA survey is acceptable (<https://naturalresources.wales/media/3509/guidance-on-use-of-dna-sampling-of-great-crested-newts.pdf>). This states that: "*eDNA can have a better rate of GCN detection (99%) than a combination of conventional survey techniques (95%)*". This guidance is in relation to EPS licencing

Guy Miller: The results of the HSI assessment, eDNA survey and the Population Class Assessment survey are all considered to be consistent. These indicate that while great crested newt is present, it is very localised and occurs in very low numbers. The survey work has been carried out to an appropriate standard, based on current industry guidance, there is considered to be high confidence in this assessment.

Matt Ellis stated that NRW guidance is likely to change, and confirmed that a guidance paper has been drafted internally outlining the reasoning behind this. However, he was not able to release this to provide further context to the discussions.

The guidance on NRW's website currently states that "*NRW will accept samples taken between 15th April to 30th June*". However, Matt Ellis noted that there is potentially some concern relating to the reliability of results from later in the accepted survey period (particularly late June). [NB Following to the meeting, dates were checked, eDNA surveys were carried out as follows 3 June 2020; 13/14 May 2021].

Matt Ellis suggested that it would be helpful if the project could demonstrate how the current conservation status (CCS) of local great crested newt

	<p>population within the Site could be restored through the project via habitat restoration and enhancement work (e.g. pond enhancement, and other terrestrial habitat features – better grassland habitat, hedgerows and scrub), and that in his view this could avoid the need for any further survey. The rationale of this approach is that the CCS of GCN at various spatial scales is unfavourable. See <u>NRW Report No 259</u>. The aims of the Habitats Directive are to maintain or restore European habitats and species to favourable conservation status. Consequently, a restoration focus approach to conserving the great crested newt will be the approach required to demonstrating no detriment to the maintenance of the favourable conservation status of the species.</p> <p>The creation and management of habitat features suitable for great crested newt can potentially be incorporated into the design and will be factored into the ecological/landscape management strategy.</p> <p>A draft great crested survey report has been prepared, which will form a technical appendix to the Environmental Statement.</p>
6. Statement of Common Ground	It was confirmed that Rhys Jones would be the right contact in NRW for Barton Willmore (Ben Lewis) to liaise with respect to agreeing the SCG.
7. Resilience, planning policy relating to biodiversity	NRW stated that demonstrating general enhancement (i.e. that not relating to mitigation for protected species, or assessment relating to possible ornithological impacts relevant to the SSSI) would be an issue for Isle of Anglesey County Council, rather than NRW.

Minutes taken by Guy Miller, BSG Ecology

13 July 2021