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Date/ Dyddiad: 12 August 2020

Dear Sir / Madam

Re: DNS EIA Scoping Direction, 3246727 Lluest y Gwynt Wind Farm

Post Scoping Response on behalf of Applicant

I write on behalf of the Applicant, Lluest y Gwynt Wind Farm Ltd, to acknowledge receipt of the EIA Scoping Direction on behalf of the Welsh Ministers and to respond to some of the matters raised. Our thanks for your efforts in issuing a Scoping Direction considering the onset of the pandemic and lockdown in late March.

On the whole we believe there is general agreement on the scope and requirements of the EIA process, and where matters are not addressed in this letter it is assumed by all parties that the provisions of the Scoping Direction will be complied with.

On those EIA matters for which further explanation or consultation is required with statutory parties, we have responded by adding a further response column in your Table 1: The Planning Inspectorate's Comments (pages 12 – 23) (attended to this letter) and any further matters raised by NRW, Ceredigion County Council and other consultees. In this table we seek to confirm precisely the nature of the environmental assessments to be undertaken; in some instances, we explain that further consultations have been precipitated between stakeholders to further confirm requirements and establish common ground on the methodologies to be applied to the EIA.

I look forward to further liaison with your Authority as this scheme moves forward.

Yours sincerely,

[REDACTED]

Michael Phillips
Principal Planning Consultant

Table of Responses to Welsh Ministers' Scoping Direction: Reference DNS 3246727:
Lluest y Gwynt Wind Farm, July 2020

ID	Referen	Issue	Comment	
	Description of the Development			
ID.1	4.5.1	Transport Access	The SR does not explain how access to the Proposed Development will be gained. Paragraph 4.5.1 refers to Section 5.7 Traffic and Transport which does not clearly provide this information.	The likely access to the site, which is currently under investigation, will be via either an existing access at Eisteddfa Gurig Farm from the A44 or a new site entrance point nearby. Either way improvement works will be required and construction with the Trunk Roads agency and Highways Authorities will be conducted from an early stage of the development.
ID.2	4.6.3	Peat Removal	For turbine foundations, paragraph 3.6.4 states that prior to excavation, peat will be lifted and carefully stored. The ES should make clear how much peat is expected to be removed for turbine foundations, or any other wind farm infrastructure.	Agreed – should peat deposits be identified that cannot be avoided construction methods and designs will be formulated to minimize losses, and to quantify any remaining losses that will inform elements of the Peat Management plan for site restoration.
ID.3	4.6.5	Crane Hardstanding	The SR describes the crane hardstanding areas but does not specify if these will be temporary during construction, or permanent throughout the operational lifetime of the development. The ES should specify which elements of the infrastructure will remain for the duration of the operational lifetime and give details of how areas will be restored where infrastructure is temporary.	Agreed

ID.4	4.6.11	Energy Storage	<p>The SR states that energy storage may be incorporate in the Proposed Development. See also Comment ID 56.</p> <p>The ES should include these parameters and define a worst case scenario. The assessment should be conducted in accordance with the parameters.</p>	Agreed
ID.5	4.6.12	Meteorological mast(s)	<p>The SR states that a meteorological mast or perhaps two will be required. The ES should clarify how many masts are required and the location subject to micrositing.</p>	Agreed
ID.6	4.6.15	Tolerance in micro siting	<p>Paragraph 4.6.15 states that the location of infrastructure will be identified in the application with a tolerance of up 100m. The Applicant is reminded that although a level of tolerance is accepted, the ES should be prepared using a clearly identified worst case scenario, as appropriate and that final design should not lead to greater likely significant effects than identified in the ES. The Inspectorate draws the Applicant's attention to NRW comment on the avoidance of deep peat at Appendix 1. It is understood that the Developer is not prepared to complete detailed ground investigation prior to submission. However, the Developer should conduct a peat survey to inform the design of the project and ensure that deep peat is avoided.</p>	Agreed

ID.7	4.8.6	Grid Connection	<p>The ES should consider the effects of the grid connection to the electricity network. Paragraph 4.8.6 states that the connection will not be part of the Proposed Development and that consent will be sought separately. However the Applicant is reminded that the environmental effects of the grid connection should be considered within the ES.</p> <p>If the intention is to apply for consent separately, it should be noted that following amendments to The Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016, an electric line above ground of up to 132kV associated with a DNS Generating Station is specified as a DNS in itself.</p>	Noted
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Aspects proposed to be scoped out				
ID.8	5.3.77	Dormouse Surveys	It is not agreed to scope out dormouse surveys at this stage. See Comment ID 31.	We propose that dormouse habitat suitability surveys are undertaken this summer (2020) to establish the potential for dormouse to be present across the site, and act accordingly based upon consultations with advisors on the results.
ID.9	5.3.87	Reptile surveys	It is agreed to scope out reptile surveys subject to avoidance measures being included in the ES.	Noted
ID.10	5.3.90	Great Crested Newts	It is not agreed to scope out Great Crested Newts surveys at this stage. See Comment ID 32.	Noted
ID.11	5.8.10	Flood risk	The Proposed Development does not appear to be located within an area at risk of flooding and as such a Flood Consequences Assessment may not be required. However, consideration should be given to the drainage of the Site and a drainage strategy presented in the ES.	Noted
ID.12	5.8.11	Coastal Flood Risk	It is agreed to scope out flood risk from the Coast.	Noted
ID.13	5.11.1	Ice Throw	It is agreed to scope out this aspect, subject to confirmation that there is sufficient distance between the turbine and potential receptors.	Noted
ID.14	5.11.5	Shadow Flicker	It is agreed to scope out this aspect, subject to confirmation that there is sufficient distance between the turbine and potential receptors.	Noted

ID.15	5.11.7	Health and Safety and Risk to human health	<p>The Applicant proposes to scope out Health and Safety and Risks to Human Health on the ground that they are not a land-use planning matter and that danger to human health arising from the construction and operation of wind farm scheme is rare. The Applicant is reminded that the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 requires the ES to include expected significant adverse effects of the development on the environment and population deriving from the vulnerability of the development to risks of major accidents and / or disasters which are relevant to the project concerned. The Inspectorate disagrees with the Applicant and confirms that these matters cannot be scoped out at this stage based on the limited information provided in the SR. Please see below comments on health and public safety.</p>	Noted
ID.16	5.11.8	Air Quality	<p>The Applicant proposes to scope out Air Quality on the basis that during operations the wind farm will not generate emissions, and that standard construction methods for dust suppression will be sufficient to ensure no significant impacts on air quality. However, the Inspectorate notes that the information provided to date does not consider whether there are nature conservation designated sites along the proposed construction traffic route which could be affected by the emissions generated by construction traffic, in particular HGVs. Additional information is required.</p>	Noted – for the avoidance of doubt details of construction activities and measures to control dust suppression / run-off will be set out in the ES.

ID.17	5.12.3	Tourism	<p>Paragraph 5.12.3 of the SR states that there is no evidence that wind farms detrimentally affect tourism, and that it is not anticipated that significant adverse effects to tourism would arise and as such it is proposed that an assessment is not warranted on this occasion. However, paragraph 5.12.9 states that the Socio-economic assessment will consider the effects on tourism and paragraph 5.12.15 states that the proposed development will be analysed within the socio-economic characteristics of the Study Area to identify the potential positive and negative effects on socio-economics, land use and tourism. Additionally, paragraph 5.12.19 states that anticipated impacts include potential negative impacts in terms of tourism and recreational activity and among businesses located in the area that meet the needs of tourists. Therefore, it is unclear based on the information provided in the SR whether a significant negative impact on tourism is anticipated. Thus, based on the SR, the Inspectorate cannot agree at this stage to scope out Tourism.</p>	<p>We acknowledge this inconsistency, and for the avoidance of doubt we confirm that the Socio-economic assessment will determine whether the potential effects of the development scheme to tourism are significant or not.</p>
		LVIA		
		<p>The Applicant is advised to consult the Snowdonia National Park Authority and Powys County Council regarding the LVIA chapter of the ES.</p>		
ID.18	5.2.15	Study Area	<p>The Inspectorate notes the Applicant's proposal to exclude turbines less than 50 m blade tip height from the cumulative assessment. The Applicant's attention is drawn to CCC's comment at Appendix 1 regarding the need to include all turbines more than 20 m blade tip height. Should the cumulative assessment exclude turbines with a blade tip height lower than 50 m, justification will need to be provided in the ES.</p>	<p>Noted – further consultations with CCC, PCC and SNPA will be undertaken to affect agreement on the cumulative sites for inclusion in the LVIA and wider EIA.</p>

ID.19	5.2.18	Significance Criteria	Paragraph 5.2.18 of the SR states that greater than moderate effects are more likely to be significant. The Applicant should identify all significant landscape and visual effects taking into consideration that moderate effects are usually consideration significant. The ES should justify significance criteria.	<p>Noted – the ES will set out in the EIA Methodology the approach to ascribing ‘significance’ to potential effects.</p> <p>In terms of the LVIA, the approach will approach will be to apply the impact matrix criteria, based on sensitivity of receptor and magnitude of effects, informed by the professional judgement by the landscape architect, as recommended in GLVIA 3.</p>
ID.20	5.2.37	Viewpoints	The Inspectorate notes the list of provisional viewpoints provided by the Applicant in the SR. It is noted that Snowdonia National Park is approximately 12 km north of the Proposed Development. Figures 5 and 6 provides the Zone of Theoretical View (ZTV) and show that the Proposed Development is likely to be visible from the southern part of the National Park, alone and in combination with other developments. It is noted that NRW and CCC have not commented on the provisional viewpoints included in the SR, at this stage. The Inspectorate recommends that the Applicant engages in discussion with the relevant authorities to consider whether additional/ amended viewpoints should be assessed in the ES, in particular with regard to the Snowdonia National Park.	Noted – further consultations with CCC, PCC and SNPA will be undertaken to affect agreement on the viewpoints for inclusion in the LVIA.
ID.21	5.2.40	Photo-montages	The Inspectorate notes that the Applicant is proposing to generate photomontages for each viewpoint. The Applicant is reminded that the ES should clearly explain the parameters used in the preparation of the photomontages i.e. turbines and other infrastructure dimensions, appearance and locations and that the parameters should be consistence with the worst case scenario used in the assessment.	Noted

ID.22	5.2.43	Night-time Visualisations	The Inspectorate draws the Applicant's attention to CCC's comment on night – time visualisations at Appendix 1 .	Noted – the Scoping Report sets out in section 5..2.42 – 43 that such effects will be assessed, inclusive of relevant visualisations.
ID.23	5.2.52	Cumulative Impacts	The SR provides a list of cumulative schemes to be considered in the ES at section 3.8. The Applicant's attention is drawn to NRW comment at Appendix 1 suggesting that the list provided is not up to date. The Inspectorate recommends that the Applicant engages with the relevant authorities, including Snowdonia National Park and Powys CC, to agree which schemes should be considered as part of the cumulative assessment. See also section 6.8 of this Scoping Direction.	The Inspectorate will understand that the palette of cumulative schemes in mid Wales is shifting regularly, and this is therefore a dynamic issue that we will seek to discuss with the consultees following baseline studies and prior to conducting the EIA.
Ecology and Nature Conservation				
ID.24	5.3.27	Baseline- Plynlimon SSSI	The Applicant's attention is drawn to NRW's comment (paragraph 15- Appendix 1) on the SSSI notable feature.	Noted
ID.25	5.3.31	Baseline – River Wye SAC	The Applicant's attention is drawn to NRW's comment (paragraph 16- Appendix 1) on the SSSI notable feature.	Noted
ID.26	5.3.33	Non Statutory Nature Conservation Designation	The Applicant is reminded that the two Roadside Verge Reserves identified are of county value.	Noted

ID.27	5.3.35 – 5.3.40	Habitats – grasslands	The Applicant’s attention is drawn to NRW’s comments (Appendix 1) with regard to grassland species and their enhancement by the lack of grazing on Site. The Inspectorate agrees with NRW that habitats of principal importance may be present on Site and that this should be investigated through Phase 2 National Vegetation Classification surveys (Paragraph 35 – Appendix 1) and that the results of the surveys should inform the layout of the Proposed Development.	Noted – the Phase 2 NVC and peat surveys will be scheduled once a more informed design of scheme, that has sought to avoid sensitive habitats, is formulated and these surveys can be more targeted.
ID.28	5.3.47	Modified bogs	The Applicant’s attention is drawn to NRW’s comment (Paragraph 20- Appendix 1) that modified bogs should be avoided where possible as they could be targeted for restoration.	Noted
ID.29	5.3.53	Peat survey	The Applicant’s attention is drawn to NRW’s alternative peat survey method presented at Appendix 1 . The ES should include justification of the survey methods used, where alternative methods exist. The Inspectorate agrees with NRW that peat should be measured deeper than 1.5 m, where present. Paragraph 5.3.55 states that peat depth surveys would be conducted 25 m either side of proposed tracks. The detailed methodology of the peat depth survey should be agreed with the relevant authority. For clarity, the ES should identify all survey points on a Figure to illustrate the extent of the peat survey.	Noted

ID.30	5.3.67	Bat Survey Methodology	The Applicant's attention is drawn to NRW's suggestion of an alternative bat survey methodology. The Inspectorate understands the Applicant is proposing to survey the Site following the Bat Conservation Trust (BCT) guidelines for a low value site and notes that NRW does not agree with this approach. The Applicant is recommended to liaise with NRW to ensure an agreement is reached on the level of surveys required to support the assessment. Any methodology used should be justified in the ES. The Inspectorate also notes that no Study Area is identified in the SR. The ES should clearly show survey Study Areas.	Noted
ID.31	5.3.77	Dormouse	The Applicant's attention is drawn to CCC's comment (Appendix 1) regarding the potential presence of dormice on Site.	Noted – see ID 8
ID.32	5.3.90	Great Crested Newts	The SR does not provide enough information to justify the exclusion of Great Crested Newts surveys. Waterbodies within 500 m of the permanent works and 250 m of temporary construction works (including access road and any off-site improvement, if necessary) should be identified and assessed for their amphibian suitability. Where suitable waterbodies are identified, presence/absence surveys should be conducted.	Noted – further habitat suitability surveys and evidence will be discussed with the nature conservation advisors.
ID.33	5.3.99	Cumulative Impact Assessment	The SR does not provide enough information to justify the exclusion of cumulative impact assessment, in particular taking into account that the provisional list of schemes presented in the SR may be incomplete. The SR acknowledges the potential presence of important habitats and species which could be significantly affected by the Proposed Development. Therefore, a detailed cumulative impact assessment is required to inform the ES.	Noted

		Ornithology		
ID.34	5.4.3	Target species	The ES should clarify which are target species as these are not clearly defined in the SR. The Applicant's attention is drawn to NRW comment (Appendix 1) on wintering and stop-over species. The SR does not provide enough information regarding how surveys targeting these species will be conducted. The Inspectorate also notes that the SR does not identify the Zone of Influence (Zoi) of the Proposed Development for target species.	Noted
ID.35	5.4.3	Vantage Points surveys	<p>The Applicant should be clear on the proposed vantage point survey effort and consider guidance from Scottish Natural Heritage¹ for hours surveyed per vantage point and season.</p> <p>The ES should identify the location and visibility arc of each vantage point. Further advice on vantage point surveys is provided in NRW's response.</p>	Noted
ID.36	5.4.11	Red Kite	The Elenydd–Mallaen SPA is within 2 km of the development site boundaries. The ES should consider whether the Site is functionally linked to Elenydd- Mallaen SPA. The Inspectorate draws the Applicant's attention to the NRW response at Appendix 1 with regards to Elenydd-Mallaen SPA. Considerations on the Habitat Regulations Assessment are reported at Section 8.1 of this Scoping Direction.	Noted
ID.37	5.4.21	Cumulative Impact Assessment	The SR does not provide enough information to justify the exclusion of cumulative impact assessment, in particular taking into account that the provisional list of schemes presented in the SR may be incomplete. Not enough information is provided in terms of the value of the Site for target species and functionality linked to Elenydd-Mallaen SPA at this stage. Therefore, a detailed cumulative impact assessment is required to inform the ES.	It was an expectation of the applicant that a cumulative impact assessment for ornithology would be a requirement of the EIA, and will be included.

Archaeology and Cultural Heritage				
ID.38	5.5.12	Methodology – pre- submission archaeological investigation	The SR is unclear on whether the Applicant is proposing pre-submission archaeological investigation. CCC’s response provided at Appendix 1 does not include the technical advice of Dyfed Archaeological Trust. The Applicant should endeavour to agree the assessment methodology with the statutory consultees and the Dyfed Archaeological Trust.	We propose that a desk-based assessment (DBA) supported by field reconnaissance will be undertaken to ascertain the archaeological potential of the site, and thereafter whether, in consultation with the archaeological curator and subject to the preliminary design of scheme, further more detailed investigations are required to inform the EIA.
ID.39	5.5.13	Baseline – peat	Baseline provided as part of the geology, hydrology and soils section indicates that the majority of the Site is underlain by slowly permeable wet and very acid upland soils with a peaty surface (Paragraph 5.8.12 of Appendix 1). No information is provided on the depth of the peat present on Site. It is noted that a peat depth survey is proposed to inform the ES (see above). The Inspectorate notes the potential for paleo-environmental impacts. The Applicant should consider whether a coordinated approach would be appropriate for investigating the peat present on Site in consultation with NRW and CCC to inform the baseline of the ES.	Noted

ID.40	5.5.35	Guidance and Assessment of Significance	The Inspectorate welcome the stated intention to ensure that the relevant guidance from Cadw is adhered to. The Inspectorate notes reference to the Design Manual for Roads and Bridges (DMRB) 2007 within this and other paragraphs within Chapter 8. The DMRB has been updated in 2019. The Applicant should use the most up to date guidance as part of the assessment.	Noted
ID.41	5.5.33	Mitigation	The SR does not provide details of the mitigation proposed should a significant impact arise. The Applicant is reminded that the ES should include a detailed set of mitigation measures, where required, along with a clear delivery strategy to be agreed in consultation with the relevant authorities.	Noted
ID.42	5.5.37	Residual impacts	The ES should contain a robust assessment to ensure that if significant residual impacts are identified there is enough evidence provided that these cannot be mitigated further.	Noted
Noise Assessment				
ID.43	5.6.27 & 5.6.33	Methodology	The Applicant should consider that the noise limits set in ETSU-R-97 are not a definition of significance. The Applicant is reminded of paragraph 3.2.8 of the Institute of Acoustic Good Practice Guide to the application of ETSU-R-97 (2013) which states that single lower fixed limits can be used where background noise levels do not vary significantly between amenity periods and night-time periods, with the agreement of the relevant authorities. The ES should demonstrate compliance with ETSU-R-97 and clearly explain how significant impacts are identified.	Agreed

ID.44	5.6.29	Survey Methodology	The Inspectorate notes that CCC Environmental Health Officer (EHO) has not responded to the consultation. Thus the Applicant is recommended to liaise with CCC to agree the background survey methodology.	Agreed
ID.45	5.6.34	Cumulative impacts	The Applicant is reminded of the detailed methodology set by section 5 the Institute of Acoustic Good Practice Guide to the application of ETSU-R-97 (2013) regarding the derivation of the appropriate lower fixed limits in the cumulative impact assessment. The ES should clearly identify all the relevant wind farms affecting the same receptors and the correct noise limits the proposal should comply with as part of the cumulative assessment, in agreement with the relevant authorities.	Agreed
Transport and traffic				
ID.46	4.5.1 and Section 5.7	Access	Paragraph 4.5.1 of the SR refers to Section 5.7 with regard of access to the Site. However, the Transport and Traffic Section does not include information on where access to the Proposed Development will be gained. Thus, it is unclear whether improvement works will be required. The ES should not only include route assessment but also explain whether additional works will be required during construction.	See response to ID 1.

Hydrology, hydro-geology and geology				
ID.47	5.8.10	Flood risk	The Proposed Development does not appear to be located within an area at risk of flooding and as such a Flood Consequences Assessment may not be required. However, consideration should be given to the drainage of the Site and a drainage strategy presented in the ES. The applicant should also be aware of the statutory SuDS regime, as referred to in section 8.3 of this Direction.	Agreed and noted
ID.48	5.8.18	Water Quality	This paragraph refers to Powys County Council. The Inspectorate believes this may be a typo.	Yes, this is a typographical error and should have read Ceredigion County Council.
ID.49	5.8.19	Groundwater Dependant Terrestrial Ecosystems (GWDTEs)	It is not currently known whether GWDTEs are present within the Proposed Development or its Zol. The Planning Inspectorate recommends that the hydrological assessment should clearly define the Zol of the Proposed Development and the ES should cross reference the ecological and hydrological assessments.	Agreed
ID.50	5.8.21	Significant Impacts	The SR is not clear on how significant impacts will be determined. The ES should clearly define how significance is established.	Noted
ID.51	5.8.27	Water Framework Directive (WFD)	The SR is not clear on whether a WFD assessment will be undertaken, but the Inspectorate advises that one should be completed.	Noted

ID.52	N/A	Mitigation Measures	The SR does not provide details of the mitigation proposed should a significant impact arise. The Applicant is reminded that the ES should include a detailed set of mitigation measures, where required, along with a clear delivery strategy to be agreed in consultation with the relevant authorities.	Agreed
ID.53	5.8.28	Residual impacts	The ES should contain a robust assessment to ensure that if significant residual impacts are identified there is enough evidence provided that these cannot be mitigated further.	Noted
ID.54	5.9.4	Peat	The Inspectorate welcomes that the ES will include a Peat Management Plan. The Applicant's attention is drawn to comment ID 29 regarding NRW comments (Appendix 1) on the proposed peat survey methodology. The Inspectorate recommends that peat depth should be investigated deeper than 1.5 m (ID 29) and that survey methodology should be justified in the ES. It would also be beneficial for the ES to include an indication of hydrological flows through the peat.	Noted – further consultations with NRW to be conducted in this regard.
Aviation and Telecommunication				
ID.55	No additional comment			N/A

Health and Public Safety				
ID.56	N/A	Energy Storage Capacity	<p>It is noted that the proposal may include energy storage capacity on Site. At this stage it is not clear which type of batteries are proposed. The Inspectorate notes that there is a potential fire risk associated with certain types of batteries such as lithium-ion and that safety measures are required in the design to minimise the risk of fire. The Inspectorate considers this to be part of the EIA process in line with Schedule 4 of the EIA Regulations (Wales) 2017. The Proposed Development should include adequate measures to ensure that an isolated fire would not become widespread and lead to a major incident. The Applicant may consider the submission of a Battery Safety Management Plan confirming that the risks are understood, accounted for and mitigated as far as practicable, in agreement with relevant consultees. The Applicant is reminded of the responsibilities set by the Regulatory Reform (Fire Safety) Order 2005. The ES should ensure that risks of accidents are accounted for and mitigated in line with Schedule 4.</p>	Noted
Socio- economics, Recreation and Tourism				
ID.57	No additional comment. See Comment ID 17.		N/A	

Additional Comments & Miscellaneous		
ID.58	<p>Climate</p> <p>The SR does not address the impact of the project on climate and the vulnerability of the project to climate change, contrary to the requirements of the EIA Regulations (Wales) 2017. It is however noted that paragraph 5.9.2 suggests the use of a carbon calculator tool, where appropriate. The Inspectorate would expect the ES to address the carbon costs of the proposed wind farm if developed on deep peat (i.e. greater than 0.5 m). The Applicant may consider submitting carbon calculations as part of the ES. There is currently no up to date Welsh guidance on wind farm development on peatlands. However, the Applicant may consider the planning advice prepared by the Scottish Government on wind farm developments on peat land.</p>	Noted
ID.59	<p>Waste</p> <p>The SR does not address the impact of generation and deposition of waste, contrary to the requirements of the EIA Regulations (Wales) 2017. However, the Inspectorate notes that the construction of the Proposed Development has the potential to generate waste which will require disposal in light of the proposal to win construction material on Site using borrow pits. Therefore, the ES should consider the generation and disposal of waste within an appropriate section.</p>	Noted

<p>Section 8.1</p>	<p>Habitat Regulations Assessment</p> <p>The Conservation of Habitats and Species Regulations 2017 require competent authorities, before granting consent for a plan or project, to carry out an appropriate assessment (AA) in circumstances where the plan or project is likely to have a significant effect on a European site (either alone or in combination with other plans or projects). The competent authority in respect of a DNS application is the relevant Welsh Minister who makes the final decision. It is the Applicant's responsibility to provide sufficient information to the competent authority to enable them to carry out an AA or determine whether an AA is required.</p>	<p>Noted</p>
<p>Section 8.2</p>	<p>Well-Being of Future Generations Act</p> <p>The Well-being of Future Generations (Wales) Act 2015 places a duty on public bodies to carry out sustainable development. It is the responsibility of the decision maker to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales. Under the Well-being Act, the planning system is required to deliver an improvement in all four aspects of well-being: social, economic, environmental and cultural. In order to demonstrate that appropriate consideration has been given to the Well-being goals and sustainable development principle in the decision-making process, public bodies are required to have regard to the 'five ways of working' contained in the Well-being Act. These require consideration of: involvement; collaboration; integration; prevention; and long term factors. It will be for each decision-making body to demonstrate how they have operated in this manner. Whilst not a legislative requirement, as part of the application documentation, the applicant may wish to consider submitting a statement to illustrate their view on how proposed developments contribute to the goals set by the Well-being Act.</p>	<p>Noted</p>

	<p>SUDs</p> <p>Whilst a separate legislative requirement from planning permission, the Applicant's attention is drawn to the statutory SuDS regime that came into force in Wales in January 2019. The requirement to obtain SuDS consent prior to construction may require iterative design changes that influence the scheme that is to be assessed within the ES and taken through to application. As such, it is recommended that the applicant contact the local SuDS Approval Body early on.</p>	Noted
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