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27/07/2021

Annwyl Syr/Madam / Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING ACT 1990 THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (WALES) REGULATIONS 2016**

**BWRIAD / PROPOSAL: CONSTRUCTION OF A SOLAR FARM AND ENERGY STORAGE HYBRID FARM, TOGETHER WITH ALL ASSOCIATED WORKS, EQUIPMENT AND NECESSARY INFRASTRUCTURE**

**LLEOLIAD / LOCATION: ELWY SOLAR ENERGY FARM, THE ROE, ST ASAPH**

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 22/06/2021.

**We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding protected landscapes and flood risk. If this information is not provided, we would object to this planning application. Further details are provided below.**

**We also advise that based on the information submitted to date, conditions regarding protected species should be attached to any planning permission. Without the inclusion of the conditions we would object to this planning application.**

**Protected Landscapes**

The development is located approximately 3.5km from the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB).

NRW's landscape planning advice relates to the development's potential impact on the Clwydian Range and Dee Valley AONB's setting and its special qualities – Tranquillity, Remoteness, Wildness, Space and Freedom.

We advise that further information should be provided in order to make an informed judgement on the scheme's likely effects on the AONB.

There are elements of the glint and glare assessment that need clarifying, and this has a bearing on the visual assessment set out in Section 5 of the Environmental Statement (ES). Please see Appendix 1 for our specific requirements.

The judgements leading to the assessment of effects on the setting of the AONB (views and special qualities) need some clarification for us to be able to advise that the assessment and its conclusions are appropriate.

The Bodelwyddan Key Strategic Site and extension to the St Asaph Business Park has been factored into the cumulative assessment baseline. However, it is unclear as to what the in-combination effect with the solar farm would look like and how this might affect the AONB setting.

The above has a bearing on the adequacy of the planting proposals put forward to mitigate visual effects. At this stage we cannot discount the need to consider other options such as the amendment of the development layout to allow space for tree planting along the site's eastern boundary.

## **Flood Risk**

The site lies partially within Zone C1 as defined by the Development Advice Map (DAM) referred to under Technical Advice Note (TAN) 15 Development and Flood Risk (July 2004). The site lies partially within the historical flood outline associated with the 2012 event for the Afon Elwy. The application has been supported by a Flood Consequences Assessment (FCA) (ref: BR-629-0008, Calibro, May 2021).

The FCA identifies the Afon Elwy, which flows to the east of the site, as the primary source of flood risk. The FCA has considered a range of scenarios, including defended and breach scenarios. The key event for assessing compliance with A1.14 of TAN15 is the 1% AEP (Annual Exceedance Probability) breach event with an allowance for climate change. The FCA shows that in the worst-case breach scenario event ('Breach 2'), flooding of the site is expected. The FCA states that flood depths are generally below 0.3 m, however maximum depths are in excess of 1 metre.

The FCA states that the elements of development located within the 1% AEP breach event with an allowance for climate change extent are some solar panels, some small substations and the site yard compound. In order to mitigate the flood risk posed in a breach event, the FCA states that the panels and substations will be raised at least 300 mm above the predicted flood level for the 1% AEP breach event with an allowance for climate change. Within the site compound, the containers, office and welfare facilities would be sited 300 mm above ground level, which is above the predicted flood depths at this location. The panel stanchions and foundation pads for the substation containers would also be designed to withstand the predicted flood velocities. Appendix G shows the contoured breach flood levels

and proposed design levels across the site. We are satisfied that these measures would adequately mitigate the identified flood risk from the Afon Elwy.

The FCA does not fully assess the flood risk from Pengwern Drain, which flows along the western boundary of the site. However, the mitigation measures identified, consisting of panels being sited at least 10m from top of bank and 600 mm above surrounding ground level, are considered acceptable.

The FCA has confirmed that no ground reprofiling will be required to deliver the proposed mitigation measures, with the exception of some small raised platforms for the substations. We are therefore satisfied that the proposal is unlikely to adversely impact on flood risk elsewhere.

In respect to A1.15 of TAN15, the FCA has considered the 1% AEP breach event with a 75% allowance for climate change. This is considered to be acceptable in the absence of breach outputs for the 0.1% AEP event. Flood depths are shown to exceed 1 metre for parts of the site, and flood velocities are shown to reach 0.6 to 1.0 m/s. These figures exceed the tolerable conditions outlined in Table of A1.15 of TAN15. We recommend you consider consulting other professional advisors in order to provide further comments relating to access and egress matters.

We are satisfied with the mitigation measures outlined within the FCA, and have no concerns in this respect, subject to the mitigation measures outlined within the FCA being secured through appropriately worded conditions.

#### Access and maintenance

However, we do require further information to be submitted in respect to access arrangements. In respect to access for Pengwern Drain, which is a designated Main River, we have previously advised that we will require an unobstructed 8 metre easement to be provided from the top of bank level, which should be free from any structures, including fencing. This is to ensure that we are able to undertake maintenance activities under our permissive powers effectively. The layout plan included in the FCA (ref: P19-2023\_15 Rev J) shows the proximity of fencing to Pengwern Drain. Whilst this is well away from the watercourse for most of the site, there is a section of fencing closer to the watercourse, adjacent to the battery storage compound. It is difficult to judge the distance from the top of bank to the fencing based on the plan, so we require confirmation that this section would also provide an 8 m unobstructed easement. We advise that the plan is updated to show the proposed 8 metre access easement.

Our operations team will require a meeting with the applicant/developer in due course in order to discuss access arrangements/induction and to discuss our working practices moving forward. We would point out that the 8-metre easement is a standard requirement to allow us to undertake maintenance under our permissive powers, which is prioritised on a risk-based approach. It should be noted that the landowner/occupier has duties as a riparian owner and can maintain watercourses on their land provided relevant assents are

in place. The document [\*A guide to your rights and responsibilities of riverside ownership in Wales\*](#) provides some further guidance in respect to the responsibilities of riparian owners.

As the site is located next to Pengwern Drain, a bespoke Flood Risk Activity Permit (Environmental Permitting Regulations England & Wales, 2016) may be required for any works in, over, under or near a main river or within a flood plain. Further advice and guidance is available on our website.

## **Protected Species**

### Great Crested Newts (GCN)

We consider the GCN population at St Asaph Business park is likely to be one of national importance. Paragraph 6.4.32 of the Environmental Statement (ES) acknowledges the importance of the area as a stronghold for GCN.

The proposal has the potential to cause disturbance to GCN and/or loss or damage to their resting places. GCN and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitat Regulations) and are classed as a material consideration for planning under the provisions of Technical Advice Note 5: Nature Conservation and Planning (TAN5).

In our opinion, construction of the proposal is likely to cause a breach of species protection legislation. We therefore advise that construction is carried out under derogation licence issued by NRW.

The ES also states that the detailed measures will be set out in a Construction Environmental Management Plan (CEMP). We agree that detailed GCN Reasonable Avoidance Measures (RAMs) should be set out in a CEMP which should be agreed to the satisfaction of the determining authority, as suggested in draft condition 12 of the Draft Conditions supporting document.

Condition 1: Construction Environmental Management Plan (CEMP) - No development shall commence until a CEMP has been submitted to and approved in writing by the determining authority. The CEMP should include:

- Detailed RAMS that address potential impacts of construction (and maintenance) works on protected species (GCNs, bats, otters)
- Details of appropriate measures to control any Invasive Non-Native Species (INNS) on site; and measures that aim to prevent INNS being introduced to the site for the duration of construction and operational phases of the scheme.
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.

The CEMP shall be implemented as approved during the construction and operational (maintenance) phases of the development.

**Justification:** A CEMP should be submitted to ensure necessary management measures are agreed prior to commencement of development and implemented for the protection of the environment during construction

We note the submitted biodiversity plan (reference Foy, D, (2021). Elwy Solar Farm, St Asaph, Denbighshire: Environmental Statement Appendix 6.7: Biodiversity Management Plan. Pegasus Group and Avian Ecology. We understand that this report was updated following representations from NRW 9 October 2020.

Our comments were as follows for the Biodiversity Management Plan (BMP);

- Aims and objectives for each identified ecological feature (habitat/species)
- Monitoring key performance indicators (KPIs). GCN monitoring to be carried out annually. Methodology to accord with and reported through the online Wales GCN Monitoring Scheme<sup>3</sup>.
- Details to demonstrate security of long-term management – it may be appropriate for this to be secured through a section 106 agreement, which includes a bond.
- Details of contingency prescriptions, including invasive species and/or introduction of fish
- Details of Ecological Compliance Audit and reporting requirements
- Details of licensing or competencies for individual management prescriptions

In our opinion, Version 5 of the BMP has not appropriately considered our advice. We therefore wish to repeat our advice that the plan is unsatisfactory in respect of all of the points listed above, and subsequently advise that the following condition is attached to any planning permission;

Condition 2: Biodiversity Management Plan (BMP) - No development shall commence until a revised BMP has been submitted to and approved in writing by the determining authority. The BMP shall be implemented as approved during the construction and operational phases of the development.

**Justification:** To ensure that an approved BMP is implemented, which protects species (GCNs, bats) affected by the development.

We consider the submitted proposals demonstrate that it is not likely to be detrimental to the maintenance of the favourable conservation status of the local population of great crested newts, provided any subsequent consent is subject to the provisions of both planning conditions and obligations.

Therefore, we advise that the below condition should be attached to any planning permission granted for this development;

Condition 3: GCN Conservation Plan - No development shall commence until a GCN Conservation Plan has been submitted to and approved in writing by the Local Planning Authority. The Conservation Plan shall include, but not necessarily be limited to :

- Build upon the principles outlined in the ecological report (Foy, D, 2021; Biodiversity Management Plan)
- Submission of further details and associated plans concerning GCN avoidance and mitigation measures including, but not limited to: fence design, specifications and locations; considerations of access issues (including PROW if applicable); monitoring and maintenance requirements; and supervised removal. Submission to include proposed timescales and reporting requirements;
- Submission of a long term site management (throughout the duration of operational and decommissioning phases of the proposal) that includes defined aims and objectives; habitat management prescriptions; contingency measures if fish or invasive non-native species (INNS) are detected; proposals that are capable of being implemented in the event of failure to undertake or to appropriately undertake identified or contingency actions; site liaison and wardening; licensing requirements for undertaking habitat management and surveillance; current and any proposed changes to the freehold tenure of the ecology ; persons or bodies responsible for undertaking management and surveillance together with required skills and competencies; reporting requirements; and proposed dates for updating or revising the management plan
- Details of timing, phasing and duration of construction activities and conservation measures
- Timetable for implementation demonstrating that works are aligned with the proposed development
- Ecological Compliance Audit, including key performance indicators (see below)
- Persons responsible for implementing the works
- Post construction monitoring and record dissemination throughout the operation and decommissioning phases of the proposal. All ponds (including SUDS water bodies) to be added to the Wales Great Crested Newt Monitoring Scheme, (see [Cofnod](#)) with individuals/bodies being identified as being responsible for monitoring and reporting works. Methodology shall include annual abundance counts and Habitat Suitability Index (HSI) assessments. Each water body, including SUDS ponds, shall be individually numbered on site.
- Submission of a biosecurity risk assessments for construction, operation and decommissioning phases of the proposal;

The Conservation Plan shall be carried out in accordance with the approved details.

This advice applies to the proposal in its present form. If the plans are changed in ways that may affect GCN on this site, a revised ecology report that takes account of such changes should be submitted to support the application. Please consult us again if any updated or

revised ecology report concludes that the proposal is more likely to have an adverse impact on the GCN population and/or alters the detail or implementation of mitigation or compensation measures.

Please also note that any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

NRW would refer the Planning Authority to the letter from the Welsh Government to Chief Planning Officer's dated 01 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

### Bats

Table 6.8 of the ES identifies that bats are likely to be using the site for foraging and/or commuting. Table 6.8 also states that a number of trees have moderate-high bat roosting potential within the site. Bats and their breeding and resting places are protected under the Habitat Regulations.

Paragraph 6.5.24 of the ES states that important bat habitats (both for roosting and/or commuting/foraging) are to be retained and protected as part of the development. Paragraph 6.5.27 also states that suitable buffer for bat habitat from any lighting used during construction will be set out in the CEMP.

We also note that the operational facility will not be lit (apart from emergency lighting associated with the battery storage facility) to avoid illuminating flight-lines and foraging areas used by bats (paragraph 6.6.2). Paragraph 6.6.32 of the ES also states that bat roost provision will be made through the inclusion of a minimum of fifteen bat roost boxes on mature trees.

In view of the information provided in the ES, and provided that detailed RAMs (particularly lighting) are provided in the CEMP (see condition 1), then we consider that the development is not likely to be detrimental to the maintenance of the population of bats at a favourable conservation status in its natural range.

### Otters and Water Voles

The ES states that no otter or water vole presence was identified during the surveys undertaken on site. Paragraph 3.2.8 of the BMP states that two existing ditch crossings require refurbishment to accommodate access tracks, and therefore pre-commencement surveys will be undertaken. Should these protected species be found then appropriate RAMS would be required. We advise that details of RAMS (including pre-commencement surveys) should be set out in the CEMP and agreed as a condition of any planning permission (see Condition 1).

Provided the above measures are implemented, then we consider that the development is not likely to be detrimental to the maintenance of the populations of otters or water voles at a favourable conservation status in their natural range.

### Hazel Dormouse

Paragraph 6.4.25 of the ES states that there are nine records of hazel dormice (most recently from 2013), of which three records were within 2km of the site and two (dating from 2005) were from within the site boundaries. Hedgerows and woodland habitat around the site provide potentially suitable habitat for this species. Hazel dormice and their breeding and resting places are protected under the Habitat Regulations.

Paragraph 3.2.14 of the BMP states that “*minor hedgerow/scrub clearance works may be required for access purposes/grid connection*” but concludes that RAMS will be sufficient to avoid impacts on hazel dormice. We agree with the conclusion of the BMP and advise that detailed RAMS should be set out in the CEMP (see Condition 1).

We also note paragraph 3.2.13 of the BMP which states “*it is proposed that additional hedgerows will be planted and existing hedgerows (especially those considered to be defunct) will be enhanced through infill planting of native woody hedgerow species, thereby providing enhanced habitat connectivity for hazel dormice*”. The habitat planting proposed is shown on Figure 6.8 of the BMP. Paragraph 4.2.7 of the BMP also states that “*additional nesting provision will be provided through the provision of a minimum of fifteen dormouse nest boxes*”. We agree with the mitigation and enhancement measures outlined in the BMP and advise that they are implemented via Condition 2.

Provided the above measures are implemented then we consider that the development is not likely to be detrimental to the maintenance of the population of hazel dormice at a favourable conservation status in its natural range.

### **Pollution Prevention**

We concur with draft condition 12, and therefore advise that detailed pollution prevention measures, identifying how relevant Guidelines for Pollution Prevention and best practice will be implemented, should be set out in the CEMP (see condition 2). The development will need to be carried out in accordance with Waste Duty of Care and Environmental Permitting Regulations. In the event of the construction phase causing an environmental pollution incident, NRW should be contacted. The contractors should produce and adhere to an Environmental Incident Response Plan.

We advise that the CEMP should provide detailed pollution prevention measures with regard to the battery storage units. We note that the ES considers the risk of a major accident. A fire at the battery storage area could result in contaminated run off to the nearby ground and watercourses. The design of the battery storage areas should minimise the escape of contaminated fire water into the environment. The CEMP should include detailed measures of industry best practice with respect to addressing risks of pollution incidents from battery storage.

There is a potential for sediment run-off during the construction phase. For a project of this scale, it is recommended that pollution prevention equipment is on site to deal with any issues that arise. For example, hessian screens to contain sediment from entering the ditches/watercourses in the area, or absorbent pads and booms in construction vehicles to contain any spillage of fuels, oils and lubricants.

Any facilities for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be 110% of the capacity of the tank, all filling points, gauges, vents and sight glasses must be located within the bund. Associated pipework should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge downwards into the bund, refuelling should be supervised at all times and preferably located on an impermeable surface.

### **Protected Sites**

We note that the nearest protected sites to the development are Coedydd ac Ogofau Elwy a Meirchion Site of Special Scientific Interest (SSSI) and Elwy Valley Woods Special Area of Conservation (SAC), which are approximately 1.7km to the south. We advise that we have not identified any pathway for effects on the SAC. We also advise that the proposal will not damage the SSSI interest.

Table 6.5 of the ES refers to the Liverpool Bay Special Protection Area (SPA) and the Dee Estuary SPA/Ramsar sites located approximately 5.8km and 8.8km respectively north of the development. We have reviewed Appendix 6.1 Technical Ornithological Appendix of the ES and consider that there is no functional link between the development site and the SPA's.

From the information provided, we consider that the proposal is not likely to have a significant effect on any SSSI, SAC, SPA or Ramsar site.

Our advice may change should modifications be made to the development prior to the determination of the application. If there are any changes to the development which may affect the consideration of potential environmental impacts, please consult us again before you determine the application.

### **Other Matters**

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

**Garmon Lewis**

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning  
Cyfoeth Naturiol Cymru / Natural Resources Wales

## APPENDIX 1

<b>ES Glint and Glare Study</b>		
ES report section	NRW review	Further information / Clarity request:
<p><u>3.1 Guidance and Studies</u>            “Published guidance shows that the intensity of solar reflections from solar panels are equal to or less than those from water. It also shows that reflections from solar panels are significantly less intense than many other reflective surfaces, which are common in an outdoor environment.”</p>	<p>Photo Viewpoint 9 appears to illustrate flood water in the Vale. It has a noticeable lighter colour and contrast with the landscape backdrop and catches the attention of the viewer.</p> <p>If the solar development has the same solar reflection qualities as water, then the development has the potential to be evident to conspicuous within AONB views.</p>	<p>We advise clarity should be provided on the effect on AONB views. The effect described does not correlate with the low impact significance assessed by this report.</p>
<p><u>4.4 AONB Receptors</u>            “It is understood that views of the proposed development within an ANOB are only possible for pedestrians at approximately 3.9 kilometres or further from the panels. Views at the closest location to the proposed development are shown in ‘Viewpoint 9’ of the photomontages 5. No AONB receptors have therefore been taken forward for geometric modelling.”</p>	<p>It is unclear as to why none of the AONB receptors have been taken forward for geometric modelling.</p> <p>If this is due to distancing, we would expect a statement to explain the reasoning.</p> <p>Another reason could be due to the angle of view from viewpoint 9, and factors such as intervening vegetation, position and height relative to the solar farm development. Again, we would expect a statement to clarify the reasoning.</p> <p>Please confirm that all AONB viewpoints have been reviewed as they sit at a variety of different elevations and angles</p>	<p>We advise that further reasoning should be provided or that all AONB views should be assessed within a Geometric Reflection Calculation table.</p>

	<p>relative to the proposed development.</p> <p>Viewpoint 10 photograph shows that quite an extensive area of the development would be visible above vegetation.</p>	
<p><u>Appendix D - Glint and Glare impact significance definitions</u></p> <p>Appendix D describes a Low Impact Significance as: "A solar reflection is geometrically possible however any impact is considered to be small such that mitigation is not required e.g. intervening screening will limit the view of the reflecting solar panels."</p>	<p>The assessment concludes (section 4.4) that effects upon the AONB from Glint and Glare would be Low.</p> <p>See AONB Viewpoint 10. Intervening vegetation has no discernible affect because of the elevated position of this viewpoint.</p>	<p>We advise that clarification should be provided as to how the assessment judgements for AONB views have been reached.</p>
<p>Appendix D sets out a clear assessment process for Road receptors and Dwelling receptors</p>	<p>There is no process for assessing visual impacts upon people in the countryside. This adds to uncertainty as to rigorousness applied to assessment of effects on AONB views.</p>	<p>We advise that clarification should be provided as to how the assessment judgements for AONB views have been reached.</p>

<b>ES section 5 Landscape and visual report</b>		
ES report sections	NRW review	NRW requirements
5.2 Assessment approach methodology	<p>Please provide narrative descriptions of what the viewer would expect to see for each of your visual magnitudes of change: High, Medium, Low and Negligible. This makes the rationale behind professional judgements a little more transparent.</p>	<p>We advise that a magnitude of visual effects table with a narrative description for each class of magnitude should be provided.</p>
5.2.25	<p>This section has not taken into account issues raised within our response dated 09/10/2020. This is however picked up later at section 5.6 on cumulative effects</p>	

Section 5.2.26	This section has not taken into account issues raised within our response dated 09/10/2020. This is however picked up later at section 5.6 on cumulative effects	
5.2.28 Legislative and Policy Framework	PPW edition 11 section 6.3.5 notes that the statutory duty includes the consideration of activities within the setting of designated landscapes	Amend 5.2.28 accordingly. This also needs to be reflected in section 5.34.3.
Limitations to the Assessment 5.2.44 Last bullet point: "The Proposed Development is of a long-term nature (up to 37 years) therefore all effects are assumed to be temporary unless otherwise stated."	<p>We consider this statement makes light of the duration of assessed effects and may attempt to lessen the weight given to the development effects. Up to 37 years is a long-term period. Several revisions of the Denbighshire LPD will take place with the solar development potentially being a characteristic element of the Vale of Clwyd landscape baseline.</p> <p>In regard to safeguarding the setting of the AONB the long-term nature of this development will factor in strategic planning decisions about locations potentially suitable for future growth.</p>	
Viewpoints 5.3.73 and Table 5.5 Selected Viewpoints	6 of the assessed viewpoints (8 to 13) lie within the AONB. We consider this range of viewpoints is sufficient to assess the visual effects.	
Consultation 5.2.26 3 <sup>rd</sup> bullet point Development visibility from Y Foel to be factored into the detailed planting proposals. - The planting plan has considered visibility from the AONB. Mitigation is limited to	<p>The statement suggests there is a reluctance to adjust the solar farm layout to allow AONB mitigation to be incorporated.</p> <p>With reference to photomontage Viewpoint 10, the site's hedgerow boundary with the A525 corridor provides no real containment to the scale of development</p>	Subject to further detailed review of any new information provided by the applicant, we may advise that tree planting should be provided along the site's eastern boundary to improve the development's

the extent of the redline boundary and available developable area.	<p>proposed within elevated views from the AONB.</p> <p>The benefit of increased tree canopy cover is illustrated by the semi-wooded effect of hedgerow trees adjacent to the site.</p>	visual integration with the setting of the AONB.
Viewpoints 5.3.73 and Table 5.5 Selected Viewpoints	6 of the assessed viewpoints (8 to13) lie within the AONB. We consider this range of viewpoints is sufficient to assess the visual effects.	
5.4.67 “there is lack of specific guidance on assessing LANDMAP aspect areas in the context of solar farms” .	<p><a href="#">Natural Resources Wales / Using LANDMAP in Landscape and Visual Impact Assessments GN46</a></p> <p>GN46 was written in response to tall structures. Whilst some elements of the guidance aren’t relevant to solar farms i.e. the typical extent of search and study areas for tall structures, the process of using LANDMAP with the Guidelines for Landscape and Visual Impact Assessment (GLVIA) remains the same for all types of development.</p> <p>The assessment of effects upon LANDMAP aspect areas is a local landscape issue and not within NRW’s DPAS remit, we therefore provide no comment on the ES findings.</p>	The consultant should ensure they have applied the methodology included in GN46 appropriately.
The visual effects on AONB views and effects upon AONB special qualities and correlation with the Glint and Glare Assessment	The landscape and visual section provides a narrative description of the visual context. It doesn’t explicitly draw upon the findings of the Glint and Glare assessment.	If the solar farm were to have similar visual characteristics as a body of water in the landscape, then the effects on AONB views and special qualities would need to be revisited.
Cumulative effects on the AONB 5.6.23	We will review this section once we have received further information.	

Summary of visual; and in combination visual effects on the AONB	It would be useful to draw the assessment together within a table similar to Table 5.9	We advise that this should be provided to clarify assessment judgements.
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<b>ES section 5 Landscape and Visual Figures</b>		
Figure number	NRW review	NRW requirements
Figure 5.7 Landscape designations and visual receptors plan (P19-2023_24)	This figure has been incorrectly named LDP on the DNS website.	Amend website reference
Figure 5.7	O/S 1:25,000 maps show Y Foeland Moel Maenefa in the AONB to be statutory open access land.	Amend Figure 5.7
Figure 5:10 AONB viewpoints 8 to 14	The extent of the development area is not clearly labelled, making it difficult to consider the development's position in the landscape and likely magnitude of change.	A thin redline boundary (or similar) marking the visible area of the site would be helpful.
Figure 5.11 Detailed planting proposals	Once we have received further information clarifying the visual aspects of the scheme, we will need to undertake a further detailed review of the planting proposals. If we identify visual issues and consider this can't be appropriately mitigated, it is likely that we will be advising an amendment to the developments layout so that tree planting can be accommodated along the site's eastern boundary. Tree planting within the highway verge of the A525 might be an option to consider.	Factor in the potential for tree mitigation planting in the site layout plan.
Photomontage Viewpoint 10 From Y Foel	The Bodelwyddan Key Strategic Site set out in the Adopted LDP 2016- 2021, is a	We advise that further information should be provided to ensure a full

	<p>major planned change to the landscape baseline.</p> <p>The extension to St Asaph Business park is also a sizeable area.</p> <p>Figure 2.1 Schemes Considered in the Assessment of Cumulative; We advise the building developments set out in Figure 2.1 should be modelled in the photomontage baseline and the solar farm cumulative image. It would be reasonable to assume the future housing development would have a similar appearance, pattern and colour to Rhuddlan and St Asaph.</p>	<p>understanding of the in-combination effects of developments upon the setting of AONB.</p>
<p>Viewpoint 11 Moel Maenefa Additional Photomontage</p>	<p>Figure 2.1 Schemes Considered in the Assessment of Cumulative; We advise the building developments set out in Figure 2.1 should be modelled in the photomontage baseline and the solar farm cumulative image.</p>	<p>We advise that further information should be provided to ensure a full understanding of the in-combination effects of developments upon the setting of AONB.</p>