



Craig y Perthi Solar Farm

Environmental Statement

Appendix 2.3 Scoping Direction Response Schedule

Prepared for



JBM Solar Projects 25 Limited

July 2023
3312-01-TA02-003



Document Control

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Table A2.3-1 Scoping Direction Response Schedule

ID	Reference in Scoping Report	Issue	Comment	Applicant Response
Description of the Development				
ID.1		Description	The proposed scheme should be described in detail in its entirety, and should cover construction, operation and de-commissioning phases as appropriate and include detailed, scaled maps and drawings.	<p>The Proposed Development is fully described in Volume 2, Chapter 4.0 of the Environmental Statement. This description includes all relevant components of the Proposed Development and manner in which they will be constructed.</p> <p>Scaled drawings have been included as part of the information provided for Pre-Application Consultation, which provide further details on specific elements for the Proposed Development. Furthermore, the Proposed Development is presented in a scaled graphic form on Volume 3, Figure 4.1 Illustrative Landscape Masterplan.</p>
ID.2		Magnitude of impact	All elements of the proposal (including substation, fencing, cabling etc) will need to be considered in the ES, especially regarding cumulative impacts. Different elements will have different impacts, especially on different receptors.	Each technical chapter of the Volume 2, Chapters 5.0 to 9.0 of the Environmental Statement includes an assessment of the likely significant effects of the Proposed Development on specific aspects of the receiving environment. Technical chapters explain how the Proposed Development may result in impacts, including those specific to that particular topic.
EIA Scoping Summary- Aspects scoped out by the Applicant				
ID.3	Table 4.1	Air Quality	PEDW agrees that this can be scoped out, considering that the transport routes proposed do not pass through known Air Quality Management Areas (AQMAs). Should the route change that it will intersect with an AQMA, then this would need to be proportionately assessed as part of the ES.	Noted.
ID.4	Table 4.1	Noise & Vibration	PEDW agrees that this can be scoped out, however the LPA raises that it would be prudent to consider the siting of switch gear and battery units in order to minimise the impacts of these on residential dwellings.	Noted. The siting of the battery storage containers and other onsite plant has been considered as an integral part of the design development process. Further information regarding the way noise impacts have been

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				prevented are included in the Volume 4, Appendix 3.2: Noise Assessment of the Environmental Statement.
ID.5	Table 4.1	Population and Human Health	PEDW agrees that a standalone chapter is not required, and that this topic can be appropriately addressed in other relevant chapters. As advised in Section 6.8 of this Scoping Direction, it may be helpful to provide a summary table in the ES that signposts where Population and Human Health is addressed.	Noted.
ID.6	Table 4.1	Geology and Soils	The Applicant's attention is drawn to comments made by the LPA regarding this issue; and that reversibility would need to be demonstrated. The Applicant is advised to consult directly with the LPA regarding how this matter should be addressed within the ES. Given the level of information provided by both the SR and the LPA, it is not possible to agree to scope out Soils at this stage.	The impacts on soil characteristics are considered in the Volume 2, Chapter 9.0 Hydrology and Flood Risk of the Environmental Statement. Control measures to be included in the finalised Construction Environmental Management Plan and Construction Traffic Management Plan, will reduce any impacts associated with soil compaction
ID.7	Table 4.1	Material Assets and Waste	PEDW agrees that this can be scoped out.	Noted.
ID.8	Table 4.1	Climate Change	PEDW Agrees that this can be scoped out as a standalone chapter with any benefits being included within the ES as appropriate and proportionate.	Noted. Climate Change is discussed in detail in Volume 2, Chapter 4.0 of the Environmental Statement.
ID.9	Table 4.1	Traffic and Transport	<p>The LPA does not agree that this element can be scoped out of the ES, due to the local road network being limited. However, no further information is provided by the LPA. PEDW therefore advises that further guidance is obtained from the LPA regarding this matter. Should this aspect be scoped out, the ES will need to proportionately explain the stance taken.</p> <p>It is therefore not possible to scope out Traffic and Transport at this stage.</p>	Noted. Further information has been provided within Volume 2, Chapter 4.0 of the Environmental Statement in relation to construction traffic, with a Construction Traffic Management Plan (CTMP) included as Volume 4 Appendix 4.2 of the Environmental Statement. The CTMP includes an Access Strategy as Appendix 2 to the CTMP, detailing how vehicles would access the development site, taking account of the suitability of existing access points, ensuring that any access options proposed are policy compliant and appropriate for the types of vehicles likely to use them.

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ID.10	Table 4.1	Major accidents and disasters – PFAS leaching	The applicant should note that some solar panels coated in PFAS (Per- and polyfluoroalkyl substances) can leach over time due to wear and tear. Should the panels proposed include this, appropriate measures need to be put in place to ensure that leaching of PFAS into the local environment does not occur.	Noted. The topic of Major Accidents and Disasters is discussed in detail in Volume 2, Chapter 4.0 of the Environmental Statement.
ID.11	Table 4.1	Major accidents and disasters- Battery storage	<p>A proportionate section on this aspect should be included in the ES.</p> <p>Major Accidents and Disasters is therefore scoped in to the ES, insofar as it relates to the proposed energy storage element.</p>	Noted. The topic of Major Accidents and Disasters is discussed in detail in Volume 2, Chapter 4.0 of the Environmental Statement.
ID.12	Table 4.1	Lighting	PEDW agrees that lighting can be scoped out.	Noted.
ID.13	Table 4.1	Glint and Glare	<p>The SR provides little information regarding the potential for glint and glare, especially considering that the site is within both Bristol and Cardiff Airport flightpaths.</p> <p>A glint and glare assessment will be required, and this should be incorporated into the ES in an appropriate location. It is therefore not possible to scope out Glint and Glare, given the limited information provided and the potential risks that the proposal could have.</p>	An assessment of glint and glare has been undertaken to assist the design development, particularly the layout of the solar arrays and the landscaping required around certain areas of solar array. The glint and glare assessment is included in Volume 4 , Appendix 3.1 of the Environmental Statement.
ID.14		Cumulative Effects	PEDW welcomes that cumulative effects will be assessed as part of the ES.	Noted.
ID.15	4.1.7	Route to farms	The SR states that the route to be utilised is already wide due to farm traffic. The Applicant is reminded that should any access tracks require widening, with the disturbance of hedgerows, vegetation and trees, that this should form part of the ES assessments.	Noted. All relevant vegetation loss has been reported within Volume 4, Appendix 3.3 Arboricultural Impact Assessment; and Volume 2, Chapter 5.0 Landscape and Visual Impact Assessment (LVIA).

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ID.16	4.1.9	Construction Traffic Management Plan (CTMP) and Transport Statement	PEDW welcomes that a CTMP and Transport will be prepared to support the application.	Noted.
ID.17	5.2.1	Cumulative assessment	As stated above, PEDW considers that cumulative effects should be assessed in line with NSIP Advice Note 17, and any deviation from that approach should be justified in the ES.	<p>Noted. However, given work previously undertaken with regard to previous applications DNS/3220457 (Rush Wall Solar Farm) and DNS CAS-01772-Z5P5D2 (Wentlooge Renewable Energy Hub), a sound starting point for considering cumulative schemes had been established. This is in line with regulation 17(4)(e) of the EIA Regulations, which states that an Environmental Statement “<i>must take account of other relevant environmental assessments required under Union legislation or any other provision of domestic legislation, with a view to avoiding duplication of assessment.</i>”</p> <p>Furthermore, additional developments have been included within this Environmental Impact Assessment, as described in Volume 2, Chapter 2.0 of the Environmental Statement.</p>
ID.18		Worst Case	It should be noted that the EIA will be prepared on a worst-case scenario basis; the worst-case may be different across each EIA disciplines (e.g. noise, ornithology, transport) and that different components of the proposed scheme can have different effects across different receptors.	Noted. Volume 2 Chapters 5.0 to 9.0 of the Environmental Statement highlight the aspects of the Proposed Development that are considered to give rise to likely significant environmental effects, with individual methodologies considering these impacts and receptors in a bespoke manner.
Landscape and Visual Impact Assessment				
ID.19	6.1.5	Photomontages	Any photomontages used should incorporate the whole proposal, not just the solar panels (e.g., substation buildings).	The photomontages have been produced according to the relevant Landscape Institute Guidance and include the whole proposal, as identified on the layout plans.

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ID.20	6.1.5	Viewpoint locations	The Applicant should liaise directly with the Council's Landscape Architect in order to establish whether the viewpoints set out in this section are appropriate, and whether additional sites should be selected.	Advice on the potential viewpoints to inform the LVIA was discussed with Newport City Council during the pre-application stage.
ID.21		LVIA	<p>Due to the lack of comment from the LPA regarding this matter, it is important that the Applicant liaises directly with them to ensure that the LVIA is compiled in a manner that is suitable.</p> <p>It is important to note that there are a number of DNS schemes within the vicinity, namely Magor Net Zero (DNS ref CAS-01960-J2H3X5) and Rush Wall (DNS ref 3220457) which may impact any visual study undertaken and should be considered as part of the assessment of cumulative impacts.</p>	<p>Advice on the scope of the LVIA was discussed with the Council at the pre-application stage.</p> <p>Magor Net Zero and Rush Wall have been considered in the assessment of cumulative effects.</p>
ID.22	6.1.68	Methodology	PEDW welcomes that the assessment will be done in line with the 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA) 3 rd Edition. Any deviation from this should be clearly explained in the ES.	The LVIA has been completed in accordance with GLVIA, the industry standard guidance.
ID.23		Residential Visual Amenity Study (RVIA)	<p>The SR does not mention whether a RVIA will be undertaken. PEDW therefore advises the Applicant to liaise directly with the LPA's Landscape Architects to ascertain if one is needed, and the scope of any potential study.</p> <p>Should a RVIA be required, this could form part of an appendix to the ES.</p>	The assessment of the effects on residential properties, including the nearby settlements as a result of the proposed development has been considered within the LVIA.
Biodiversity				
ID.24		LPA comments	Due to the lack of comment from the LPA regarding this matter, it is important that the Applicant liaises directly with them to ensure that the biodiversity chapter of the ES is compiled in a manner that is suitable.	The assessment of biodiversity has been undertaken in accordance with pre-application advice received from Newport City Council and ongoing consultation with Natural Resources Wales

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ID.25	Table 7.1	Survey Scope	consultation should be held with NRW and the LPA in order to ascertain this scope.	
ID.26	7.1.5 – 7.1.18	SSSI – Reen management and surveys	The Applicant's attention is drawn to NRW's comments contained at Appendix 1 regarding reen ditch surveys, and how they will be safeguarded and maintained. PEDW advises that the Applicant adheres to the information provided, including information contained under 'Grips and hydrology surveys' and 'Shrill Carder Bee'.	<p>Shrill carder bee surveys were completed in 2023. The aim of this survey was to ascertain whether shrill carder bee and suitable habitat is present within the assessment site. Impacts on this species are assessed in Volume 2, Chapter 6.0 of the Environmental Statement, with , with enhancement detailed in the LEMP.</p> <p>Ditch surveys within Gwent Levels – Redwick and Llandeenny SSSI were completed in 2021. A ditch enhancement plan will be included as an Appendix to the LEMP with the aim of bringing the majority f ditches within the SSSI boundary into favourable condition, as per NRW measures.</p>
ID.27		Grip and Hydrology	NRW notes under 'Grips and Hydrology' that the ridge and furrow landscape and gripped fields provide hydrological connections to the ditches and reens. It is therefore advisable that the ES includes an assessment of which fields within the site have a presence of the historic ridge and furrow system. PEDW agrees with this.	Further information is provided in Volume 2, Chapter 9.0 of the Environmental Statement.
ID.28	7.1.8	Otters	The Applicant's attention is drawn to comments made by NRW regarding the potential for otters to be using reens near the development site, and that further assessments are required.	Otter surveys have been completed in 2023. A report has been drafted and impacts on this species are assessed in the ES chapter, with mitigation detailed in the LEMP.
ID.29	Table 7.2	Consultation	PEDW welcomes that the Applicant will consult the LPA's Ecologist, NRW, Gwent Wildlife Trust and RSPB, given the sensitivities outlined in the SR.	RSPB have been consulted. NRW have been consulted through the scoping process. The LPA will be consulted once ecology surveys are complete.

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ID.30		Construction Environmental Management Plan (CEMP)	PEDW welcomes that the Applicant will provide a CEMP. Information on what is to be included in the CEMP is provided by NRW at Appendix 1.	Noted. Where relevant aspects have been considered as part of the Outline Construction Environmental Management Plan (CEMP), which will be refined as the assessment process progresses.
ID.31	7.1.32	Hedgerow maintenance and Trees	Any loss of trees or hedgerows should be clearly described and potential impacts on other receptors should be surveyed as necessary.	There will be some loss of hedgerow extent in Gwent Levels – Redwick and Llandeveyney SSSI areas as a result of ditch management. Surveys for other receptors, in particular dormice and great crested newt, have been completed.
ID.32		Great Crested Newts (GCN)	The Applicant's attention is drawn to comments made by NRW contained at Appendix 1 where it is noted that there are records of GCN within 2 km of the site, and advise that surveys consider all waterbodies within 250 m of the development site. As no information regarding the studies is provided, PEDW agrees with NRW's stance.	All accessible water bodies have been surveyed. The results of the eDNA surveys for GCN were negative in all instances, indicating that water bodies within the local area are likely to be devoid of GCN activity, and therefore likely significant effects are not envisaged.
			With the information provided, it is therefore not possible to scope out Great Crested Newts at this stage.	All accessible water bodies have been surveyed and once results are issued great crested newts can be either scoped out, or into, the impact assessment
ID.33		Hazel Dormouse	The Applicant's attention is drawn to comments made by NRW contained at Appendix 1 where it is noted that dormouse surveys should be undertaken.	Dormouse surveys have been completed in areas where there is potential for impacts to occur. Further information regarding dormouse surveys can be found in Volume 4, Appendix 6.3 Dormouse Survey Report.
ID.34		Improved access to new woodland	The Applicant's attention is drawn to comments made by NRW contained at Appendix 1 where it is noted that a new area of woodland has been planted, and therefore the scheme's mitigation and / or enhancement measures are explored to improve connectivity.	Further information regarding the enhanced ecological connectivity resulting from the Proposed Development is included in Volume 4, Appendix 4.3 Landscape and E This will be taken into account within the LEMP.
ID.35		Project scope	The SR does not note the impact that the cabling would have, and if this aspect were to be included in the proposal at this stage. If it is to be addressed, then the ES needs to contain studies carried out for all the site, including any cabling routes and surrounding areas.	The grid connection route has been considered in relation to biodiversity within Volume 2 Chapter 6.0 Ecology and Chapter 7.0 Ornithology of the Environmental Statement.

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ID.36		Ornithology surveys	The Applicant's attention is drawn to comments made by NRW regarding Ornithology. PEDW agrees with these comments.	Wintering and breeding bird surveys have been completed. A report has been drafted and impacts on this group are assessed in Volume 2, Chapter 7.0 of the Environmental Statement, with mitigation detailed in the Volume 4, Appendix 4.3 Landscape and Ecology Management Plan.
Cultural Heritage				
ID.37	8.1.24		PEDW welcomes that baseline data will be gathered from the sources identified, and that potential surveys will be discussed with GGAT as well as Cadw.	Noted. All surveys have been discussed with GGAT and Cadw as appropriate
ID.38		Survey walkover	The Applicant's attention is drawn to Cadw's comments that information produced as part of the Agricultural Land Classification assessment should also be reviewed as part of the desk based assessment, and the need to consult with Gwent Glamorgan Archaeological Trust (GGAT).	The preparation of the historic environment desk-based assessment (Volume 4, Appendix 8.1 of the Environmental Statement) included a review of the Agricultural Land Classification assessment. GGAT has been consulted as appropriate.
ID.39		Survey scope	Cadw notes that the assessment of historic assets should take place inside 3 km of the application area. The assets that should be considered are contained at Appendix 1, and further information relating to the stages that need to be carried out and included in the ES are contained within Cadw's response.	The assessment of designated historic asset utilises a study area extending 3 km from the application site boundary. The assessment incorporates the stages identified by Cadw.
ID.40		Stage 1 assessment	The Applicant's attention is drawn to comments made by Cadw stating that a stage 1 assessment should be carried out for all designated heritage assets. PEDW agrees with this.	A Stage 1 assessment has been undertaken for all designated heritage assets within 3 km of the application site boundary.

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ID.41		Gwent Levels Landscape of Outstanding Historic Interest (LHOI)	The Applicant's attention is drawn to comments made by Cadw where it is noted that a separate assessment will be undertaken with regards to the impact on the registered Gwent Levels Landscape of Historic Interest (LOHI), which will be in the form of an ASIDOHL1 report. It is noted that the Landscape Character Area has already been agreed which area is to be considered in the ASIDOHL2 study. This should be proportionately noted in the ES.	The ASIDOHL assessment is presented as Volume 4, Appendix 8.2 of the Environmental Statement.
Hydrology and Flood Risk				
ID.42	9.1.2	Flood Consequences Assessment (FCA)	PEDW welcomes that the application will be supported by an FCA, and that the ES will address any potential impact on the watercourses during development operation and decommissioning phases of the proposal.	Noted. The FCA is also supported by site-specific modelling
ID.43		Surface water management	The Applicant's attention is drawn to comments made by NRW contained at Appendix 1 detailing what the ES should contain regarding this matter.	This has been reflected in Volume 2, Chapter 9.0 Hydrology and Flood Risk, particularly the NRW Reen and Ditch Habitat Surveys
ID.44		Soil compaction	The Applicant's attention is drawn to comments made by the LPA regarding geology and water resources, and requests that the appropriate construction techniques are utilised to prevent compaction. PEDW agrees with this, and notes that additional information should be sought from the LPA and NRW as to how this can be achieved.	Soil compaction issues have been reflected in the ES chapter, with mitigation proposed
Other Considerations				
ID.45		PRoW	It is noted that on OS plans, as well on aerial photography there are a number of PRoW run through the site. The Applicant will need to ensure that if the scheme is approved, access is maintained all times. The Applicant should consult with the LPA's PRoW	There will be no temporary or permanent closure of any PRoW crossing the site. The Proposed Development would result in significant benefits for future users. Ongoing consultation will be held with the appropriate officers at Newport City Council.

ID	Reference in Scoping Report	Issue	Comment	Applicant Response
			Officers to ensure that the appropriate measures during construction and operation are adhered to.	
ID.46		Biodiversity enhancement	Whilst not part of the EIA process itself, in line with the Environment Act 2021 and Future Wales, the proposal should include biodiversity enhancement measures to provide a net benefit for biodiversity. This will need to be clearly included in all applications.	Biodiversity enhancement measures are discussed in detail in Volume 4, Appendix 4.3 Landscape and Ecology management Plan.