



Glöyn Byw | Butterfly Solar Farm

Environmental Statement

Scoping Direction Response Schedule

Prepared for

RWE

RWE Renewables UK

September 2025
3456-01



Document Control

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Table 1: Scoping Direction Response Schedule

| ID | Reference in Scoping Report | Issue | Comment | Applicant Response |
|---|-----------------------------|--------------------------------|---|---|
| EIA Scoping Summary- Aspects scoped out by the Applicant | | | | |
| ID.1 | 4.3.2 – 4.3.10 | Traffic and Transport | PEDW agrees that this can be scoped out and welcomes that a Construction Traffic Management Plan (CTMP) will be submitted with the application. PEDW advised the Applicant to liaise directly with the LPA for comments on traffic and transport. | Noted. The Applicant has liaised directly with WCBC (correspondence is provided within the Transport Statement) and this discussion informed the approach to the Transport Statement (provided as a standalone report, prepared by Axis, 2025). |
| ID.2 | 4.3.11 – 4.3.14 | Air Quality | PEDW highlights NRW's concerns and advises the Applicant to liaise directly with NRW to agree if air quality can be scoped out. | The Applicant has engaged with NRW directly through the submission of an Air Quality Technical Note (Appended to the ES). NRW has subsequently confirmed that Air Quality can be scoped out of the ES. |
| ID.3 | 4.3.15 | 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. | Noted. |
| ID.4 | 4.3.16 – 4.3.20 | Geology and Soils | The Applicant's attention is drawn to comments made by the LPA regarding this issue. The Welsh Government's (WG) Agriculture Directorate highlighted the need for a detailed ALC survey and a soil management scheme. Given the level of information provided by the SR, it is not possible to agree to scope out Soils at this stage. | A detailed ALC report (provided as a standalone report, prepared by Reading Agricultural Consultants, August 2025) and an Outline Soil Management Plan (provided as a standalone report, prepared by Askew Land and Soil, September 2025) has been prepared. |
| ID.5 | 4.3.21 – 4.3.24 | Flood Risk and Water Resources | NRW disagree that Flood Risk and Water Resources should be scoped out of the ES, the Applicant's attention is drawn to their comments. NRW advise that a screening exercise should be completed to determine if a Water Framework Directive (WFD) Regulations 2017 compliance assessment would be needed to inform the application. NRW state that consideration of how the cable route interacts with the water environment, and whether cable | The Flood Consequence Assessment and Drainage Assessment have been updated in light of NRW's comments. A Baseline and Preliminary Water Framework Directive Compliance Assessment has been undertaken (provided as a standalone report, prepared by WaterCo, September 2025). A Water Features Survey has been undertaken (reported in the Baseline and Preliminary Water Framework Directive Compliance Assessment). |

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| | | | trenches could impact water features (e.g. streams, springs) is needed and require a water feature survey to be completed along the cable routes and around the array areas. | |
| ID.6 | 4.3.25 – 4.3.26 | Material Assets and Waste | It will be necessary to address Material Assets and Waste in a proportionate manner in relevant chapters. The draft Construction Environmental Management Plan (CEMP) should also be included as a technical appendix to the ES. | Noted. The Outline CEMP is submitted with the application (provided as a standalone report, prepared by Axis, September 2025). |
| ID.7 | 4.3.27 | Climate Change | PEDW agree that Climate Change can be scoped out as a standalone chapter and addressed in the relevant sections of the ES. | Noted. Climate change is appropriately addressed in relevant chapters. |
| ID.8 | 4.3.28 – 4.3.29 | 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.8 | 3.3.7 | Major accidents and disasters- Battery safety | The proposed development should include adequate measures to ensure that an isolated fire would not become widespread and lead to a major incident. The SR states that a Battery Safety Management Plan (BSMP) will be implemented, PEDW welcomes this. | Noted. The topic of Major Accidents and Disasters is discussed in detail in Volume 2, Chapter 4.0 of the Environmental Statement. An Outline Battery Safety Management Plan is submitted with the application (provided as a standalone report, prepared by Abbott Risk Consulting, September 2025). |
| ID.9 | 4.3.30 – 4.3.31 | Lighting/Glare | PEDW agrees that lighting can be scoped out. | Noted. A Glint and Glare Assessment has been prepared (provided as a standalone report, prepared by Pager Power, September 2025). The assessment of glint and glare has been undertaken to assist the design of the development, particularly the layout of the solar arrays and the landscaping required around certain areas of solar array. |

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| Landscape and Visual Impact Assessment | | | | |
| ID.10 | | Clwydian Range and Dee Valley (CRDV) National Landscape | NRW highlight that their advice is related to the landscape character and visual amenity of the CRDV National Landscape (Area of Outstanding Natural Beauty) and its setting, and the statutory purpose of the designation to conserve and enhance its natural beauty. | Noted. |
| ID.11 | 6.15 | Landscape and Visual Impact Assessment (LVIA) | NRW agree with the general approach for the LVIA set out in the SR. They add that the guidance mentioned in the SR should be used together with 'Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment GLVIA3 Technical Guidance Note LITGN-2024-01' (August 2024). | Noted |
| ID.12 | Figures 6.2 a-d | Study Area and Zone of Theoretical Visibility (ZTV) | NRW notes that the boundary of the proposed search and study area for the LVIA and ZTV does not extend sufficiently to reach the CRDV National Landscape and therefore advise that the search and ZTV study area should be extended to include the CRDV National Landscape. PEDW recommends the applicant liaises directly with NRW and the LPA to agree an appropriate ZTV range and study area, ensuring this is clearly justified in the ES. | Advice on the scope of the LVIA was discussed with the Council at the pre-application stage. The Applicant has liaised directly with NRW to agree the LVIA study area and ZTV extents. As a result, ZTV mapping has been extended to over 10m from the solar array areas and viewpoints in the CRDV National Landscape have been assessed. |
| ID.13 | Table 6.1 | Viewpoints | As there is no ZTV data for the CRDV National Landscape and no viewpoints currently proposed from within it, NRW are unable to rule out whether the statutory landscape may be affected. Therefore, if additional ZTV data indicated potential visibility of the site from within the CRDV National Landscape, NRW advise that viewpoints from within the National Landscape should be included in the LVIA to assess effects on the landscape and its setting, | As above, the Applicant has liaised directly with NRW. Extended ZTV mapping has been produced and viewpoints in the National Landscape have been assessed as part of the LVIA. |



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| ID.14 | 5.7 Appendix 6.1 Figure 5.1 | Cumulative Effects | NRW welcome the proposed inclusion of a cumulative assessment and agree with the methodology set out in Section 5.7 of the Scoping Report and Appendix 6.1: LVIA methodology. NRW concur with the 2.5 km study area for cumulative effects as shown in Figure 5.1. | Noted. |
| Biodiversity | | | | |
| ID.15 | | | PEDW did not receive any comments from Wrexham CBC regarding Ecology. The Applicant is advised to liaise directly with the LPA for advice on ecology. | The assessment of biodiversity has been undertaken in accordance with pre-application advice received from WCBC and PEDW. |
| ID.16 | 7.2.11 | Key Habitats | PEDW highlights that although the 1990 guidelines are quoted in NRW's response, NRW have previously confirmed they endorse the Handbook for Phase 1 habitat survey | Noted. Methods for surveys are detailed within the Ecology ES Chapter. |
| ID.17 | 2.1.30 | Protected Sites | NRW identify potential impacts to the Johnstown Newt Sites SAC and Stryt Las a'r Hafod SSSI in relation to disturbance to Great Crested Newt; potential habitat loss associated and grid route options; air quality; and pollution. As the site is within the catchment of the River Dee and Bala Lake SAC, NRW highlight that under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments. It is therefore advised that as part of any future planning application submission, sufficient details of the proposed method of foul drainage are provided to inform the Habitats Regulations Assessments (HRA) or to confirm whether or not any additional wastewater would be discharged from the site. | Assessment and further information is provided in Chapter 5.0 of the Environmental Statement. A report to inform a HRA (with regard to Johnstown Newt Sites SAC and River Dee and Bala Lake SAC) is appended to Chapter 5.0 of the Environmental Statement. |

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| ID.18 | 7.1.8 | Protected Species | NRW advise that the site should be assessed to determine the presence of protected species and that targeted species surveys are undertaken for all species scoped in. | Baseline ecological surveys have included extended habitat survey, breeding bird survey, non-breeding bird survey, bat survey and great crested newt eDNA survey The extended habitat survey is considered sufficient to identify additional features such as badger. |
| ID.19 | 7.4.25 – 7.4.29 | Great Crested Newt (GCN) | The Applicant's attention is drawn to NRW's comments in Appendix 1 where they include a list of resources which the Applicant is advised to consider when assessing the impact on GCN in the ES. NRW note that Section 7.4.8 of Appendix 7.4: Great Crested Newt Presence or Absence (eDNA) Survey Report states that the Johnstown Newt Sites SAC and underlying Stryt Las a'r Haffod SSSI is located immediately adjacent to the cable route and therefore will be scoped into the assessment. The SR states that appropriate mitigation for any work within the SAC buffer would be proposed. NRW advise that clarification should also be provided in respect of any works proposed within or bordering the SAC/SSSI associated with the grid route options. | Additional resources noted. Limitations to great crested newt eDNA surveys are provided in Appendix 5-4. All surveys were undertaken within the appropriate season, however a precautionary approach has been taken throughout the assessment. Impacts to Johnstown Newt SAC and Stryt Las a'r Haffod SSSI are identified within this Chapter and as Appendix 5-7: Information to Inform a Habitats Regulations Assessment Report. This considers all works, including those associated with cable route works. |
| ID.20 | 7.2.37 – 7.2.39 | Bats | NRW welcome the approach set out in the SR. | Noted. |
| ID.21 7.4.33 | D.21 7.4.33 | Otter | NRW highlight that Otter is a feature of the River Dee and Bala Lake SAC. Section 7.4.33 of the SR states that no suitable watercourses for otter are located within the site. However, NRW note that no consideration appears to have been given to the use of | Otter scoped in to the assessment |



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| | | | ponds as otter foraging habitats. PEDW direct that otter are scoped into the ES. | |
| ID.22 | 7.4.36 | Dormouse and Water Vole | NRW agree with the rationale set out in the SR to scope out Dormouse and Water Vole from the ES. | Noted. |
| ID.23 | 7.2.28 – 7.2.33 | Ornithology | <p>NRW raise the following concerns in relation to the Breeding Bird Survey (Appendix 5.2). The habitat on site is suitable to support Barn Owl. Barn Owl was also identified within the desktop survey, however, the species was not considered in the SR. NRW therefore advises that impacts on Barn Owl should be fully considered in the ES. This should include a species-specific survey during the breeding season and a robust mitigation/enhancement package. For further details, see NRW's comments in Appendix 1. Barn owl are therefore scoped into the ES.</p> <p>NRW highlight that Table 1 showing the 2022 breeding bird survey results (Appendix 1 of Appendix 5.2) features the column "status" which appears to relate to breeding status, however, no definitions/criteria have been provided within the report as to how the breeding status for each species was derived. NRW advise that this should be provided within the ES to enable the impacts of the scheme on breeding birds to be fully assessed.</p> | Barn owl are specifically assessed within Chapter 5.0 of the Environmental Statement. |
| ID.24 | | Conservation Status | NRW advise that the ES should consider significance (both alone and in combination) and, where applicable, conservation status. In respect of conservation status, NRW advise that consideration is given to current conservation status (CCS), and demonstration of no likely detriment to maintenance of favourable | Noted. |



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| | | | conservation status (FCS) during construction, operation and decommissioning phases of the scheme. | |
| Noise and Vibration | | | | |
| ID.25 | Chapter 8 | Noise and Vibration | PEDW agree with the approach to scope Noise and Vibration into the ES and welcome that the Applicant will liaise with Wrexham CBC Environmental Health Officers to agree noise sensitive receptors, noise criteria and assessment methodology. | Noted. |
| Historic Environment | | | | |
| ID.26 | | Assessment methodology | n their response in Appendix 1, Cadw state that they agree with the contents of the chapter in regard to the proposed assessment methodology. | Noted. |
| ID.27 | Section 9.4.2 | Legislation | Cadw highlight that The Historic Environment (Wales) Act 2023 was enacted on the 4 November 2024. This has replaced The Ancient Monuments and Archaeological Areas Act 1979; The Historic Environment (Wales) Act 2016 and The Planning (Listed Building and Conservation Areas) Act 1990. Cadw adds that the Levelling Up and Regeneration Act 2023 and the Public Services (Social Value) Act, 2012 are not relevant in regard to the historic environment in Wales: However, similar provisions are made in the Well-being of Future Generations (Wales) Act 2015. | Noted. |
| ID.28 | Section 9.4.23 | Surveys | Cadw note that no further surveys are currently proposed, however, it is noted that geophysical surveys are being conducted on the site and it may be necessary for archaeological evaluations to be carried out in order to establish to verify the extent, and significance of possible archaeological features that have been identified. Cadw add that these evaluations | An assessment of the geophysical surveys is provided within Chapter 7.0 of the Environmental Statement. |



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| | | | would need to be carried out prior to the completion of the EIA so that their results can be incorporated into that document and the impact of the proposed development on the historic environment can be fully considered. | |

