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Design Review Report

Prosiect Maen Hir Solar Energy and Storage,
Ynys Môn Isle of Anglesey

DCFW Ref: 323

Meeting of 9th July 2024

Review Status	**CONFIDENTIAL**
Meeting date	9th July 2024
Issue date	19 July 2024
Scheme description	Renewable Energy Infrastructure
Scheme location	Ynys Môn Isle of Anglesey
Scheme reference number	N323
Planning status	Pre-planning/PINS DCO Submission

Key Points

- DCFW is supportive in principle of renewable energy generation and in supporting the Welsh Government, and the UK Government, to meet their policy ambitions in respect of decarbonising our power supplies.
- This project is of considerable scale and complexity - offering both considerable potential for long term benefits and wider value for regenerative land management, biodiversity and landscape management.
- A major opportunity exists for this project to set a best practice precedent which could inform and shape a strategic framework/plan for Ynys Môn, reflecting principles which can be used to guide and shape other initiatives over the longer term. We strongly encourage the client and project team to explore this with local stakeholders.
- The long-term but ultimately temporary nature of this project provides unique challenges and opportunities. Knowing that a landscape will be actively managed for a specific purpose for 60 years enables a long term view to be taken on soil quality, biodiversity, ecological systems, etc. In parallel there is an opportunity to design installations that can be removed in their entirety, reused or recycled, for example by avoiding use of concrete and ensuring that components can easily be separated into separate materials at the end of their design life. This could enable a legacy at the end of 60 years that is entirely positive: clean energy for 60 years and landscape in a healthier and more sustainable condition. Clear commitment to this would contribute significantly to creating a best practice precedent.
- A more compelling narrative is beginning to take shape as the project develops. This needs to be developed further, refined and clarified so that it be clearly communicated at the next stages for a range of audiences. The process of mapping and selection should be made clear in all communications and should reflect the wider opportunities as well as the options/influences for prioritisation.
- There is a clearer understanding of the relationship between policy set out in the relevant NPS, applicable to the DCO process, and that of the framework legislation in Wales, reflected in the Wellbeing of Future Generations Act which is embedded in planning policy at all levels – from Future Wales, planning Policy Wales, statutory

stakeholders and local guidance. Thought should be given to how the design principles reflect delivery against this range of policy and how they may inform or be used to govern requirements in delivery.

- The demands of technical requirements and standards, categorisation of landscape character, availability and appropriate land use, and the consideration of other factors, is complex and is informing prioritisation and the development of design principles. This process should be articulated.
- More detail is still required and would be beneficial on the proposed battery storage and as far as possible, associated National Grid infrastructure.
- The design principles need an explicit rationale. They should reflect delivery against policy; should address the scope of the generic and provide a framework for treatment of the special and/or particular areas. This should include land in use directly for the power generation as well as land not directly in that use, but which plays an alternative important role in achieving wider objectives. If the design principles are to be largely brought in to inform 'micro-siting' within fields selected by a wider constraint driven more technical process, this should be made much more explicit.
- Consideration should be given as to how the design principles are to be given 'weight' in the DCO consent and Requirements process. If a flexible parameters-based consent is to be sought, how will be design principles be used in delivery, by whom and when, and how will their use be enforced.
- The approach to project delivery, constructability and decommissioning offers a potential for exemplar practice which should be pursued. Long term considerations should be reflected in a commitment to a positive legacy including reuse and recycling of installation components, betterment in terms of landscape resilience, ecology and biodiversity, as well as the energy generated. This offers a unique opportunity to contribute to decarbonisation and net zero pathways and should be pursued.

Consultations to Date

This is the second Design Review with the Design Commission for Wales and was convened on Ynys Môn as part of the continuing project team consultation. A further review meeting is anticipated during the autumn after the first stage statutory consultation.

The Design Commission's comment remains confidential at this time. Whilst notice of the project is available publicly via a project website, detailed design processes and

assessment are not. The comment of the Commission on those processes will therefore remain confidential until statutory consultation commences.

This second report should be read in conjunction with the report from the first review meeting held in April 2024.

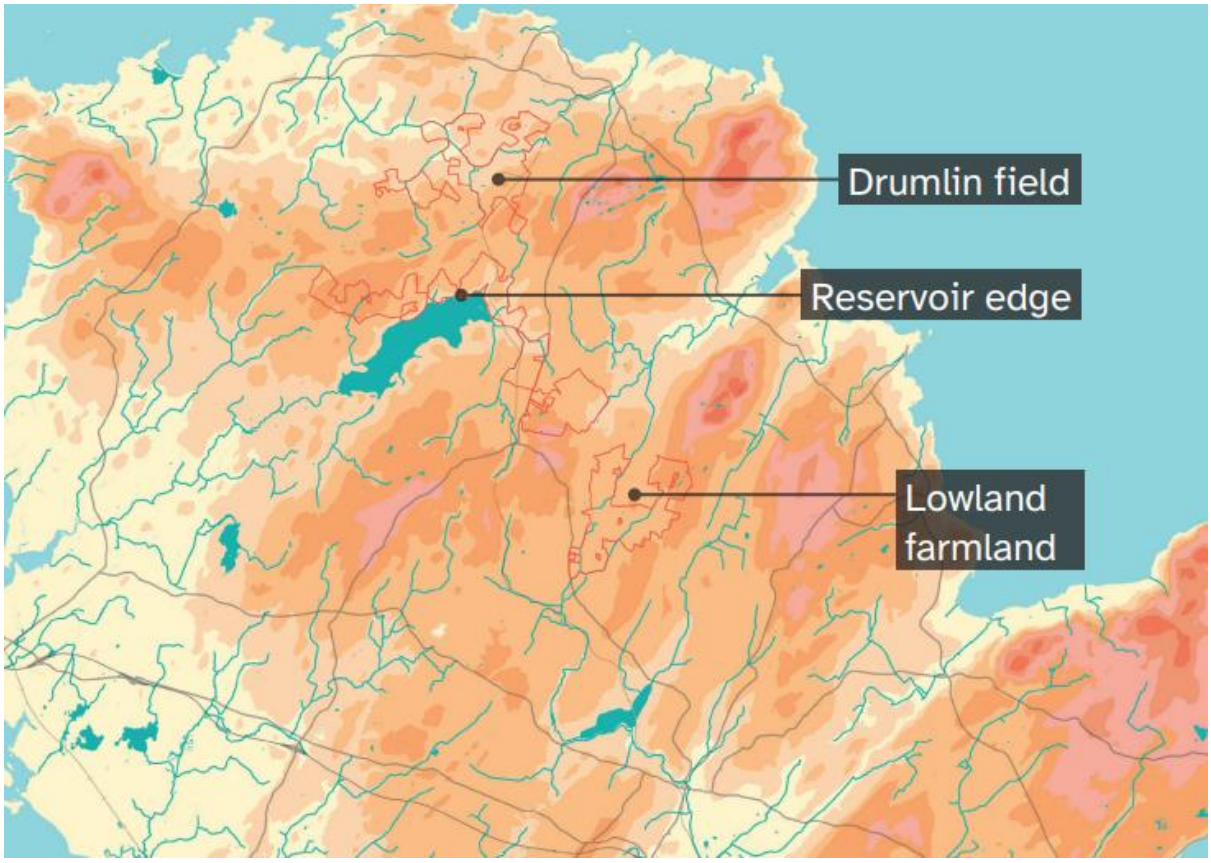
The Proposal

The Prosiect Maen Hir Solar Energy and Storage proposal is categorised as a Nationally Significant Infrastructure Project (NSIP) requiring a Development Consent Order (DCO) via the Infrastructure Planning Inspectorate. The Site is proposed for a solar generating station with a capacity of over 350MW, with energy storage.

Key elements include:

- Solar PV Arrays
- Project Substation
- Grid connections
- Battery Energy Storage System (BESS)
- Accesses
- Temporary construction compounds
- Enhancement and mitigation
- Community Solar PV Array (~5MW)

The project is intended to form a key part of the Isle of Anglesey Council's (IoACC) Energy Island Programme, which seeks to put the Island at the forefront of low carbon energy research, development, production and servicing, with the intention of bringing economic, community and environmental benefits.



Map showing the location, site and context for the project.

Context

The site is located in the north of the Island, comprising approximately 1,234 hectares (ha) of land, in four main land parcels. The northern parcel includes the former Shell site at Rhosgoch. The two central parcels border Llyn Alaw and Llandyfrydog, and the southern parcel lies to the north of Llangefni, all within the administrative boundary of the Isle of Anglesey County Council. The site and surrounding area contain a variety of landscape types covering four character areas: Amlwch and Environs, North West Anglesey, Dulas Bay Hinterland, and West Central Anglesey.

At this second review meeting it was evident that these distinct landscapes sit within a 10km area and bring considerable complexity to the project approach, and design decisions as to identification and treatment of high value areas, as well as considerable opportunity for a lasting, positive legacy in the form landscape recovery, resilience and regeneration. This is a key influence on the development and refinement of design principles, their weight in planning terms and their longer-term influence over the lifespan of the project. Considerable attention was given to this in the discussion and to the

previously highlighted creative tensions of policy and legislation which attend this project and its determination via the DCO process.

Main Points

The Design Commission welcomes the opportunity for further engagement with these proposals and this second meeting was helpful in setting out progress since the late spring and the stage at which the client and design team have reached in preparation for the Development Consent Order (DCO) application process. The project is one of scale and complexity. However it represents a considerable opportunity to contribute to renewable energy generation, to Ynys Môn's ambitious concept for the 'energy island' and to capture long term community benefits, not least a positive landscape legacy.

Currently, taking into account appropriateness of use for generation, proximity to National Grid Supply and connections points, and areas of sensitivity, sufficient land is available to meet project capacity at this scale.

Further work is being done to pursue opportunities to better link selection of land holdings – in part or in full - to key strategic objectives, over time and taking a long term view of the project lifespan and legacy. This work must be rigorously pursued so as to identify and communicate key wider opportunities and project benefits. There is at least a 60 year horizon in play and consideration of a positive project legacy is critical for delivering against policy, at all scales, and formulating design principles and perhaps an 'Island-wide' strategic plan which positively influences and shapes practice for delivery of this project and other initiatives which may come forward, as well as realising wider benefits and valuable legacy. This might form part of an appropriate boldness of approach, and we encourage the team to pursue this given the scale of the project and the land management that will be necessary, now and in the future.

A broader masterplan could be a valuable part of the local benefits that this project will need to offer. The influence of Welsh framework legislation enshrined in the Wellbeing of Future Generations Act and its integration in Welsh planning policy provides a useful context for realising this opportunity.

Design Principles

It became apparent during the review that the design principles per se were not being used to aid the strategic site selection, individual farm or land parcel selection, or in some cases the initial exclusion of certain fields or landscape features. The process of environmental constraint analysis undertaken to arrive at the current 'concept

masterplans' or 'development framework' layouts for each of the four current red lines appeared to be a more technocratic process, the criteria for which was not made available to the panel. It would be helpful to understand more around the role of design in its widest consideration in arriving at the initial areas presented on the day.

It would be helpful to clarify in future material the distinction between this site prioritisation exercise, and the produced design principles, making it clearer one was effectively a second stage and nested within the broader process. We would urge the team to ensure they retain a foot in the wider EIA process and that a language of environmental design linked to environmental outcomes is applied and used at this more strategic scale.

It was noted there are four distinct landscape areas each with different characteristics within the scope of the land areas identified for this project. The first stage of consideration as to their nature, appropriate use and treatment has resulted in early prioritisation (noted above) but there is much more to come. The value of local knowledge and experience informing the project evolution, in the form of contributions from multiple landowners is evident and offers further unique opportunities. This process should be articulated and drawn upon to help communicate the project benefits and inform a wider policy development piece across the island and with key stakeholders. This has also helped inform the commitment to capturing natural capital, enhancement of natural systems such as watercourses and wetland areas as well as methodologies for establishing design principles and ways in which they may be used to shape delivery.

Some areas can be appropriately addressed through more generic principles, appropriate across the project. Others will need specific principles which articulate and reflect specialness and the particular and assist prioritisation in key areas. This is a key task for the duration of the current design development stage and should be used to clarify and refine language for clear articulation and communication of project vision, objectives and outcomes – and align principles to each in a manner that they help form a framework for delivery.

The need for design development to explore (draw, test and design) the practical application of these principles is a key part of this stage and how they work for real locations selected from each of the identified landscape types, remains a key task. We would be particularly interested to explore how and when these principles 'bite' within the DCO process of applying for a parameters based broad consent for an order limit and key physical dimensions of the generating kit being deployed. For example, will they be used in detailed design post DCO as part of discharging requirements, effectively as micro-siting

criteria, or will they be passed to a design and build team to work with, and/or will they be used to refine the initial areas arising from the EIA based environmental constraints analysis undertaken.

Either way the design principles remain in key elements, integral to the design and project objectives, which in turn should reflect delivery against policy. In this regard we refer the team to our comment in the report form the April meeting, including identifying '*what stakeholders consider are the strategic landscape, visual and ecological objectives for this part of Ynys Môn. For example, to restore or conserve habitats or key views, or to encourage recreational access or most importantly, whether to accept or promote landscape change, or to actively work to avoid it. These objectives may not be common across the whole study area. From careful consideration of these, specific design principles should and could then be prioritised and more definitively developed'.*

In summary, consideration of the DCO process and taking every opportunity to 'lock in' design principles which can be useful in delivery and over the long term remains a key part of this work and communicating 'optimum' scenarios.

Design Development

The commitment to responding to the Welsh policy and legislative context is noted in terms of the Well-being of Future Generations Act; Welsh planning policy and guidance as well as priorities for Net Benefit for Biodiversity and the Welsh Government approach to solar arrays in the context of agricultural land.
https://www.gov.wales/sites/default/files/publications/2022-08/best-and-most-versatile-agricultural-land-and-solar-pv-arrays.pdf.
This forms part of the current work and selection process and remains a piece to be defined and described as to how it will work in practice.

In assessing the landscape setting the urgent need to address environmental degradation, and the damaging impact of many current agricultural land management practices on wildlife and water courses should be fully analysed. This analysis should consider how land management is to be undertaken during the lifetime of the project and what mechanisms may be put in place to enable flexibility and adaption. Establishing how solar farms could form part of a solution to these pressing problems could provide a compelling part of the advocacy for such major changes to the Welsh landscape.

As noted in the key points, the long-term but ultimately temporary nature of this project provides unique challenges and opportunities. Knowing that a landscape will be actively managed for a specific purpose for 60 years enables a long term view to be taken on soil

quality, biodiversity, ecological systems, etc. In parallel there is an opportunity to design installations that can be removed in their entirety and reused or recycled, for example by avoiding any use of concrete and ensuring that components can easily be separated into separate materials at the end of their design life. This could enable a legacy at the end of 60 years that is entirely positive: clean energy for 60 years and landscape in a healthier and more sustainable condition.

Stakeholders and strategic coordination

The process being undertaken with multiple landowners and stakeholders is ongoing and as part of the next stage should be articulated and reflected in communication and consultation process. This will be important to evidence it as well as to communicate the rationale and aid understanding for prioritisation and alignment with stated ambitions for wider long term benefits.

Next Steps

The Design Commission would welcome further engagement and recommends a further meeting after the first stage of statutory consultation, in mid/late autumn 2024. In preparation for the next meeting the Design Commission advises that the team should prepare drawn materials expressive of the design principles both generic and those that address specialness and particularity of landscape treatment; details of installation and constructability commitments and distillation of response to statutory consultation. We would also welcome greater consideration of the proposed battery storage systems and grid infrastructure and more specific proposals as to the proposed approach and treatment of the former oil tank storage depot at Rhos Goch, given its ecological sensitivity.

A Welsh language copy of this report is available upon request.

Attendees

Client:	Aaron Brown, Lightsource BP
Design Team:	Alister Kratt, LDA Robert French, LDA Kris Hindaugh, LDA Lewis Turner LDA
Local Authority:	No representatives of the local authority were present at this meeting. The local authority is a statutory consultee in the DCO process.
Observing:	No observers at this meeting

DCFW Design Review Panel

Chair:	Ewan Jones
Panel:	Simon Power - Lead Panellist Andrew Linfoot Simon Richards Carole-Anne Davies, Chief Executive, DCFW

Declarations of Interest

Panel members, observers and other relevant parties are required to declare ***in advance*** any interests they may have in relation to the Design Review and meeting Agenda items. Any such declarations are recorded here and in DCFW's central records.

Ewan Jones is co-chair of the DCFW Design Panel and has worked with LDA, in his capacity as Partner at Grimshaw, on several projects however there is no current professional relationship that has a bearing on this proposal.

Andrew Linfoot noted that Jacobs have worked with members of this team but that to the best of his knowledge there are no current relationship that have a bearing on this proposal.

Alister Kratt of LDA is a member of the DCFW Design Review Panel but was representing LDA at this meeting.

Aaron Brown of Lightsource BP is a former employee of Jacobs.