

PEIR Addendum

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Future Energy Llanwern Limited

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Appendix A: FEL 1001-170 Rev 03

Appendix B: Outline Bird Mitigation Area Management Plan (oBMAMP)

Appendix C: Technical Note to Re-Consultation - Ecological and Ornithological Assessment

1.0 Introduction

1.1 Reason for re-consultation

- 1.1.1 This document supports the re-consultation on a change to the Proposed Development prior to submission of the Development Consent Order application.
- 1.1.2 The change relates to the inclusion of additional land to the proposed order limits set out in the PEIRS and S42 Consultation. The additional land would be used for land management for the purpose of mitigating impacts upon skylark, curlew and lapwing. No additional built development is proposed within these areas, which would remain in agricultural use and be managed to provide suitable habitat for skylark, curlew and lapwing.
- 1.1.3 The change is proposed in response to consultation received through the statutory consultation process and in particular, feedback received by Natural Resources Wales (NRW) in respect of the details set out in the Ornithology chapter of the Preliminary Environmental Information Report (PEIR).
- 1.1.4 As the proposed change represents the inclusion of additional land to the proposed order limits as set out in the PEIR and S42 consultation, the applicant considers it appropriate to undertake a supplementary, targeted consultation covering the precise change and its relevance to the wider PEIR. This targeted consultation should be read alongside the PEIR and all relevant environmental effects of these changes have been considered and covered through this document.
- 1.1.5 The additional areas proposed for inclusion are shown below at Figure 1 and Figure 2. The total extent of the order limits now cover an area of 597.8 Ha. The plan at Appendix A shows the full extent of these areas in the context of the order limits.
- 1.1.6 There are no other significant changes to the DCO application that constitute the need for additional, targeted consultation. Any other changes to the DCO design implemented in response to PEIR / s42 Consultation are considered minor and therefore addressed as part of the main ES and outlined in the applications design change register for full transparency. Such changes are to be anticipated following the S42 consultations as the applicant responds to the feedback received in the process.

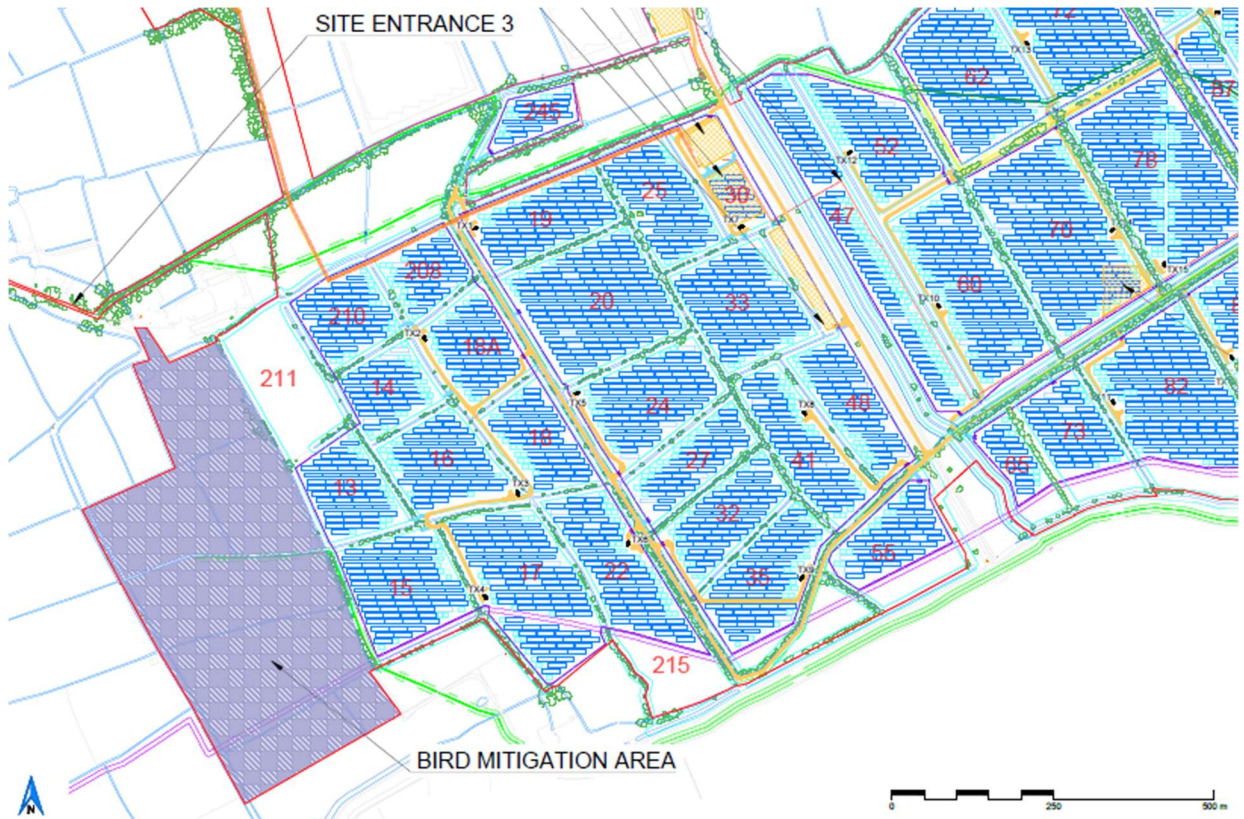


Figure 1 Western Bird mitigation area shown in purple

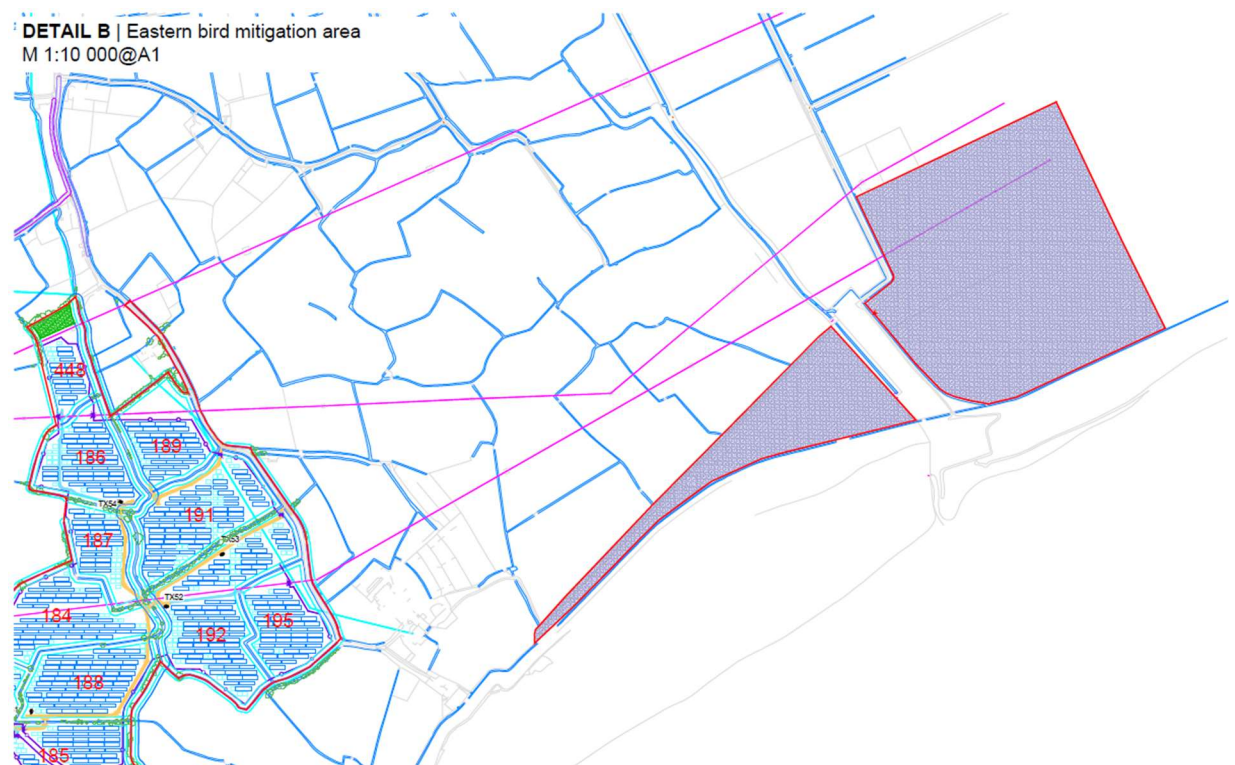


Figure 2 Eastern bird mitigation area

1.2 Scope of re-consultation

- 1.2.1 The re-consultation will cover the proposed use of additional land to be included within the DCO order limits in order to allow comment on these new areas of land prior to submission of the DCO application.
- 1.2.2 No actual development is proposed in the above bird mitigation areas, only changes to the proposed land management to be undertaken alongside the wider proposal. The full details of the proposed land management are set out in the Outline Bird Mitigation Area Management Plan (oBMAMP) and are summarised in section 3 of this report. The amendments represent an increase to the bird mitigation land being proposed alongside the proposed development.
- 1.2.3 The scope of documents being consulted upon therefore comprises the following:
- PV Layout Plan - FEL1001-100 06 showing the additional bird mitigation land being included in the revised DCO Order Limits. No other changes are being proposed.
 - The Bird Mitigation Strategy prepared by technical specialists justifying the reason for selecting the land and area being proposed.
 - This Covering Note on Re-Consultation
- 1.2.4 The documents have been circulated to key consultees and uploaded to the Project website at <https://www.futureenergyllanwern.co.uk/>

2.0 Proposed Amendments

2.1 Bird Mitigation Plan

- 2.1.1 The overarching aim of the proposals is to provide suitable alternative habitat for ground nesting birds to mitigate the loss of ground-nesting habitat as a result of the Proposed Development. This will provide additional area to that already included within the DCO boundary. These areas will comprise a mosaic of grassland habitats known to be used by the target species, broadly:
- Open grassland with good visibility.
 - Shallow wet pools e.g. grips with some bare patches for foraging.
 - Removal/ reduction in height or extent of hedgerows (excluding outer boundary hedgerows) to reduce potential predator perches and to increase line of sight across the areas to improve their attractiveness for breeding birds. It is proposed that an additional 2.06km (0.53ha) of hedgerow will be removed to provide open fields.
 - Precise hedgerows are yet to be determined but this removal would be within the two bird mitigation areas themselves and not on the perimeters of these blocks in locations adjoining third party land
- 2.1.2 On-going management will be in line with the other dedicated bird mitigation areas in the DCO boundary, focusing on creation a varied sward and grassland habitat mosaic with nesting and foraging features for skylark, curlew and lapwing; management as an extensively grazed pasture with low stocking rates with removal/ reduction in grazing during the key breeding period; and removal/ reduction in the suitability of potential predator perches.
- 2.1.3 Full details of the proposals are set out in the accompanying Bird Mitigation Plan which accompanies this re-consultation.

3.0 Summary of PEIR disciplines

3.1 Scope of relevance to other PEIR Assessments

- 3.1.1 The table below sets out the relevance of the amended plans to the other PEIR Disciplines which have been assessed. Where applicable, the table explains why certain disciplines are unaffected by the change and are therefore not relevant to this supplementary consultation.

Table 3.1: Assessment of proposed change against PEIR Disciplines

PEIR Discipline	Relevance to the amended plans being consulted upon
Description of Development	The Description of Development remains relevant to the proposed development. It is noted that the current PEIR chapter already includes reference to ‘environmental mitigation and enhancement areas’. The proposed incorporation of additional land now extends the DCO order limits, west and east, to 597.8 Ha (increased from 547.69 hectares Ha). The additional land is located in two blocks, one to the west of the order limits as set out in the PEIR and the other to the east of these. The block to the west is adjoining the previous PEIR boundary whilst the block the east is located approximately 375m away at its closest point. The additional land is in agricultural use, used for a combination of cattle and sheep grazing. These land uses would continue alongside the proposed land management. The additional land would only be used for ecological mitigation and there would be no change to the field pattern, access arrangements, or change to the use class of the land.. The fundamental development proposal remains the construction, operation, maintenance and decommissioning of Future Energy Llanwern, a ground mounted solar farm with a generating capacity of over 350 MW for a temporary period of 40 years.
Alternatives and Design Evolution	The proposed mitigation areas were assessed for their suitability, noting the characteristics required. The selected areas offer the opportunity to provide improved habitat for the bird species due to their specific character and their potential for improvement. They are located nearby and adjacent to the site boundary and are located at either end of the development spreading the range of mitigation areas available to the species. They represent optimal conditions for the proposed use and although alternative areas were considered in the vicinity of the site, these were found to comprise smaller, irregular fields which were less suitable and could not be

	enhanced to the same level for mitigation purposes.
Legislation and Policy	The same Policy and legislative context applies to the inclusion of the additional land as that which has already been cited through the PEIR. The change does not engage any new Policy or guidance which has not already been referenced. The land remains inside the two local authority boundaries of Newport City Council and Monmouthshire County Council.
EIA Methodology	The proposed change is consistent with the EIA methodology described in the PEIR and the mitigation hierarchy entailed by the process. It is noted that efforts have already been made to avoid fields with higher counts of breeding Lapwing and so the proposal for additional mitigation follows the first principle of avoidance before mitigation.
Greenhouse Gases	The proposed mitigation would not introduce any new form of sola development, including solar panels which might off-set fossil fuel sources whilst also having an embodied impact of their own. The proposals are just for land management and although some hedgerow removal is proposed, this would be compensated for through scrub planting, resulting in a negligible change in the potential for Carbon sequestration. The full impacts of this change would be fully assessed through the EIA.
Cultural Heritage and Archaeology	The field patterns of the proposed mitigation areas would be unaltered as a result of the development and the proposed maintenance of grip drainage features may provide a net benefit to the historic landscape character above baseline conditions. Some, targeted hedgerow removal may be required which would open up the landscape, in line with the historic landscape character. The total quantum of hedgerow losses was not detailed under the PEIR but a worst case scenario was assumed. Full details will be resolved through the final Environmental Statement (ES). The maintenance of grip drainage features would help to preserve another historic landscape character feature. There would be no excavating or piling works with the potential to impact upon below ground archaeology in these areas. They would remain in agricultural use, albeit with a controlled land management regime in place to optimise conditions for ground nesting birds.
Ecology	As the proposed change is most relevant to Ecology and Ornithology, these impacts are covered in a standalone Technical Note provided at Appendix C to this document.
Ornithology	
Water	The proposed mitigation measures would not impact directly upon the water

Environment	environment, most notably the reens and ditch habitats. The additional land would not introduce any features, which would impact or be impacted by flood risk. The removal of hedgerow would have the potential to reduce a build up of debris in the reens and ditches (which is why it is proposed as a standalone enhancement measure elsewhere on the site). The total quantum of hedgerow losses was not detailed under the PEIR and a worst case scenario was assumed. Full details will be resolved through the final Environmental Statement (ES). The maintenance of grip drainage features would support a healthy, functioning drainage system which has historically functioned on the Gwent Levels.
Landscape and Visual Amenity	No additional development is proposed as part of the amendments. The prevailing landscape character would remain intact as the area would be preserved as open agricultural land with the existing field pattern maintained. The management of the additional areas could entail the loss of 2.06km of hedgerow but this would be contained within the areas themselves with no hedgerows being removed on the perimeters of these areas. These perimeters benefit from strong hedgerow boundaries and consequently, their retention would ensure that the wider hedgerow removal would not increase the visibility of the proposed solar farm from key vantage points. The additional areas would continue to be experienced as open, agricultural landscape. Both areas would be visible from the Wales Coast Path, and there is a public footpath running through the western area. The impacts upon these receptors would be limited as the environment here would still be conceived as a rural, agricultural landscape. Full assessment of landscape and visual impacts will be carried out through the EIA, including viewpoint assessments from the PROW network.
Glint and Glare	It is not anticipated that there would be any change to the preliminary assessment of Glint and Glare impacts assessed through the PEIR. The proposals do not introduce any new infrastructure or development and would not open up new vistas between the site towards sensitive receptors for the purposes of the assessment.
Noise and Vibration	The new mitigation land will not introduce new or different noise and vibration activities otherwise experienced on site and therefore the proposals would not entail any new noise and vibration impacts, besides the negligible noise caused through the adaptive land management techniques proposed to optimise the site for ground nesting birds which are set out in the oBMAMP (Appendix B). The areas are not situated in such close proximity to residential dwellings that the proposed activities would cause any

	meaningful impacts. The EIA will include a full assessment of noise and vibration impacts covering all identified receptors in the vicinity of the site.
Socio-economics	The proposed amendments would not cause any negative social or economic impacts over and above those already assessed through the PEIR. The current agricultural land use would continue alongside the proposed adaptive land management which would be set out in the DCO application, with full details secured by requirement. Conversely the amendments represent an increase in proposed landscape works which provide additional economic opportunity for local contractors.
Transport and Access	No new vehicular access are proposed during construction and operation and no additional construction traffic movements would be generated as a result of the change. The proposed land management during construction and operation would entail some vehicular movements but these would be no different and comparable to current agricultural use activities of these areas, and would occur over such a period of time that any change would be imperceptible on the local highway network with no material increase in traffic intensity.
Ground Conditions	The land in the proposed mitigation areas would remain in an agricultural use and the proposed mitigation measures would not introduce any activities that significantly change the physical or chemical nature of the land or ground conditions. No materials would be stored on the proposed mitigation areas and no development would occur within them.
Other Environmental Topics	The following additional environmental topics were assessed through the PEIR: • Human Health and Population • Telecommunications, Television Reception and Utilities • Waste • Major Accidents and Disasters • Heat and Radiation The proposed land management would not introduce any new or different significant effects over and above those already assessed through the PEIR in respect of these disciplines.

Cumulative Effects and Interactions	There would be no increase in the scale or form of proposed development as a result of this change. The proposed mitigation areas would not introduce new forms of development and would only represent a net benefit when compared with the ornithology and ecology impacts which have previously been assessed through the PEIR.
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4.0 Summary

4.1 Overview

- 4.1.1 Targeted post-PEIR consultation is generally appropriate where design changes are material but localised in effect. The key objective is to ensure consultees have a fair opportunity to comment on matters that could influence the final DCO application while maintaining a clear and auditable link between consultation feedback, design evolution and the final Environmental Statement.
- 4.1.2 This re-consultation has been undertaken to seek views on the proposed inclusion of additional land within the Development Consent Order (DCO) Order Limits for the purpose of delivering enhanced bird mitigation. The proposed amendment responds to consultation feedback received during the statutory consultation process, particularly in relation to the ornithological assessment, and would increase the overall DCO Order Limits to 597.8 hectares. No additional built development is proposed within these areas, which would remain in agricultural use and be managed to provide suitable habitat for skylark, curlew and lapwing.
- 4.1.3 The proposed land management measures are intended to supplement the existing mitigation strategy by creating and maintaining high-quality breeding and foraging habitat for ground-nesting birds. The measures include the establishment of a diverse grassland mosaic, management of grazing, maintenance of wet features, and selective hedgerow management to reduce predator perches. Full details of the proposed management are provided within the accompanying Bird Mitigation Strategy.
- 4.1.4 The assessment confirms that the proposed amendment does not alter the nature or scale of the Proposed Development and would not give rise to any significant new environmental effects beyond those already reported within the Preliminary Environmental Information Report (PEIR). While the amendment is principally relevant to the Ecology and Ornithology assessments, the review of all other environmental topics concludes that the proposals would have negligible or no additional effects beyond those reported in the PEIR. The amendment therefore represents a targeted enhancement to the project's environmental mitigation in response to stakeholder feedback, without changing the fundamental characteristics of the Proposed Development.
- 4.1.5 Following this re-consultation, any feedback received will be fully reviewed and addressed in the ES and the DCO application.