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09 October 2019

RENPLAN CONSULTING LTD - BEN LEWIS
OFFICE 207
THE HIVE
6 BEAUFIGHTER ROAD
WESTON-SUPER-MARE
NORTH SOMERSET
BS24 8EE

Dear Sir,

Re: PROPOSED INSTALLATION OF GROUND MOUNTED PV SOLAR PANELS AT LAND EAST OF THE A48 AND LAND SW OF TYCROES, ADJ TO CLAWDD DDU SOLAR FARM, TYCROES, AMMANFORD, SA18 3RE

Further to your Statutory Pre-Application request, please see below the response of the Local Planning Authority. In accordance with the Town and Country Planning (Pre-Application Services) (Wales) Regulations 2016, the response is set out under five headings.

(a) The planning history of the land on which the proposed development is to be carried out, so as far relevant to the proposed application:-

E/02108 - CONSTRUCT TWO LANE SINGLE CARRIAGEWAY 7.3M WIDE WITH GRASS VERGE, FOOTWAY AND CYLCEWAY AND NECESSARY STRUCTURES AND ROUNDABOUTS (ROUTE STARTS AT COOPERS CORNER IN THE WEST AND THE ROUTE RUNS DUE EAST TO PENYGARN ROAD BEFORE CURVING NORTH TOWARDS PANTYFFYNNON FARM THEN CROSS RIVER AND RAILWAY BEFORE CONTINUING ALONG THE RIVER AND JOIN THE RECENTLY BUILT ROUNDABOUT AT TESCO) - Withdrawn. 03/07/2001

S/02081 - FARM TRACK - Agricultural Det. Pp Not Required - Committee 19/10/1999

S/00108 - ACCESS ROADWAY 3M WIDE - Full Granted - Committee 19/09/1996

D4/6410 - TOURING CARAVAN SITE - Refused 16/09/1982

D4/254 - ELECTRICITY SUPPLY - Granted 29//07/1974

b) The provisions of the development plan, so far as material to the proposed application:-

The area is covered by the Carmarthenshire Local Development Plan that was adopted in December 2014. The relevant policies are as follows:-

SP1(i) Sustainable Places and Spaces
SP2 Climate Change

SP11	Renewable Energy & Energy Efficiency
SP14	Protection and Enhancement of the Natural Environment
GP1	Sustainability and High Quality Design
TR3	Highways in Developments- Design Considerations
EQ4	Biodiversity
EQ5	Corridors, Networks and Features of Distinctiveness
EQ7	Development within the Caeau Mynydd Mawr SPG Area
RE3	Non-Wind Renewable Energy Installations
EP3	Sustainable Drainage

Further information on the LDP can be viewed on our website:-

<http://www.carmarthenshire.gov.wales/home/residents/planning/policies-development-plans/local-development-plan>

(c) Any supplementary planning guidance, so far as material to the proposed application:-

Wind and Solar Energy

Caeau Mynydd Mawr

Nature Conservation and Biodiversity

Archaeology and Development

Further information on Supplementary Planning Guidance can be viewed on our website:-

<http://www.carmarthenshire.gov.wales/home/residents/planning/policies-development-plans/supplementary-planning-guidance>

Useful advice and information on Ecology (including lists of Bat Surveyors and Ecological Consultants can be found on our website:-

<http://www.carmarthenshire.gov.wales/home/residents/planning/planning-applications/do-you-need-planning-permission>

(d) Any other considerations which are or could be material in the opinion of the authority

We have carried out consultation and the responses along with the analysis is set out below.

(e) An initial assessment of the proposed development on the basis of the information provided under paragraphs (a) to (d).

In no particular order, the consultation responses are summarised below.

Public Rights of Way (PROW)

The Eastern Parcel of Land affects two PROW 34/27 and 34/28 that need to be taken into consideration and the impacts assessed in any submission. You will have to apply for temporary diversion during construction and given the amenity implications may be advisable to apply for a permanent diversion for 34/27 around the field boundaries.

CADW

There is inadequate information to comment at this stage. A HIA needs to assess the impact of the development on the following SAM and Listed Buildings.

Scheduled Ancient Monuments

CM192 Bryn Maen Standing Stone

CM193 Bryn-y-Rhyd Standing Stone

Listed Buildings

14812 Pantyffynnon Station
14813 Pantyffynnon Signal Box
19449 Church of Saint Edi

The methodology used should comply with "The Setting of Historic Assets in Wales". A stage one assessment will identify which assets require further assessment.

Arboriculture Officer

A BS5837 Tree Report is needed identifying root protection areas. A shading plan would also be advisable when the scheme is being drawn to avoid later loss of trees.

Highways

Trips would use existing HGV routes along the A48 and A483. It is not envisaged that there would be any abnormal loads required, only what is expected on a large project. Given the location, SWTRA should be consulted. Two highway conditions imposed on the nearby Clawdd Ddu Solar Scheme are also relevant here, namely:

1. There shall at no time be any means of construction vehicular access to the development from C2134 Road.
2. The panels shall be erected and orientated in such a manner, so as not to give rise to glare and dazzle to road users.

There are no in principle objections to the proposal however a transport statement will highlight the details of the traffic implications including routes and traffic movements, types of vehicle etc so detailed consideration will be given at that time.

Welsh Government - Agricultural Land Use & Soil Policy Advisor

The site has not been surveyed to provide this response, however the records indicate that the land classification to the East of the A48 is grade 3b and Tycroes is grade 4 and 5. It is therefore confirmed that the site is not considered to be the Best and Most Versatile Land.

Coal Authority

There are two mine entries within, or within 20m of the site. A coal mining risk assessment is therefore required. Links are provided to relevant documents for information.

www.groundstability.com

<https://www.gov.uk/planning-applications-coal-mining-risk-assessments>

Drainage

There will be a requirement for approval from the Suds Approval Body. This is under separate legislation and is therefore parallel to planning.

Public Protection

Public Health – An assessment of Glint and Glare needs to be submitted. This would need to analyse the likely lines of reflection relative to the sun's trajectory.

Noise – No comment at this stage, however from other cases, it is acknowledged that there is a noise impact on third parties (rain beating down on hard surfaces and humming from inverter boxes etc) if located in close proximity, so an assessment needs to be undertaken.

Ecology

The Preliminary eco appraisal appears to be acceptable, however the recommendations need to be reflected in the CEMP LEMP. The ecological recommendations need to be shown on the submitted plans. Protected species e.g. Badgers, Dormice, Otter etc are within the remit of NRW – they have not provided comments, however I note that they commented on the screening opinion. A site meeting would be useful to discuss enhancement as required under the Environment Act.

Landscape

CCC Landscape Officer has responded with a copy of Landscape Advice note PV1 relating to the requirements for a planning application. This is a standard advice note.

As discussed in our meeting it was stated that a landscape design scheme which fully integrates with a LEMP for the proposed development should be provided prior to determination. However the level of detail required in Section 4 of PV1 may be delivered subject to an appropriate planning condition. If this detail is to be recommended for conditional approval, a Landscape concept scheme proposal plan should be submitted with the following details clearly indicated on the proposal plan, as appropriate to the proposed development:-

- i) Description of the proposed uses of, and materials for all external space, including definition of the areas to be planted and grassed, and areas of hard surfacing.
- ii) Clear indication of the location and description of the broad concept of the proposed planting elements of the scheme, as distinct landscape types^[1], i.e. shrub, woodland, individual trees, hedge etc. and description of their combined role with the retained or translocated existing landscape elements in delivering the identified design functions.
- iii) Clear indication of the location and extents of all proposed landscape types to demonstrate delivery of the landscape design functions.

A comprehensive landscape and visual impact assessment will be needed to assess the impact of the proposal, especially from public footpaths across the Loughor Valley from which it will be visible. Photo montages would assist in visualising the impact from public vantage points. An assessment of residential impacts will also be required to assess amenity impacts.

Cadent on behalf of National Grid

Searches based on your enquiry have identified that there is apparatus in the vicinity of your enquiry which may be affected by the activities specified. The proposal is in close proximity to a gas pipeline as shown on the attached plan. Advice should be sought at an early stage.

Natural Resources Wales / Welsh Water

There is no statutory duty to comment at this stage, however advice can be obtained if you contact them direct.

Analysis

The summary of consultation responses above gives an indication of how a DNS will be viewed. The responses are generally positive, however more information would be required such as a detailed LVIA, RIA, Glint and Glare assessment (especially given proximity to the trunk road) and a Transport Statement in order to do a full and comprehensive assessment of the impact on landscape and residential amenity. More information is required on habitat management and this needs to be reflected on the plans and supporting documents.

An assessment of the carbon used to produce the panels and develop the site vs the annual carbon saving through the green energy would provide context and see how many years it would take to be carbon neutral/carbon saving.

The economic impact is generally scrutinised with interest by third parties and any community benefits need to be clearly set out.

The route of cabling needs to be clear between the three parcels and the grid. The nature of the connection whether under or over ground would have different impacts. For example if trenching a cable, how does it affect hedgerows and habitats, along the route.

^[1] Appendix 2 provides a list of potential distinct landscape types.

Comments from NRW at screening stage, and reflected by your ecologist in respect of the Caeau Mynydd Mawr SPG will need to be addressed. The County Ecologist has not recommended a contribution as the area of direct impact has been removed and panels should not affect connectivity as the sites would be permeable for butterflies, however you will need to convince NRW and Inspector that the overall impact on the Marsh Fritillary Butterfly (given habitat enhancement etc) would not be adverse, otherwise it would not satisfy an appropriate assessment under the Habitat Regs.

A site meeting to discuss habitat is outside the scope of a statutory pre-app submission, however we can offer this as an additional chargeable service and can discuss as a follow up to this response.

The above advice is given on the basis of the information currently available, and without prejudice to any formal determination that the Council may be required to make. Any subsequent applications will be subject to formal determination based upon consideration of the merits of each application, current planning policy, legislation, relevant consultation responses and other material planning considerations relevant at that time.

Should you require any further assistance please do not hesitate to contact the above-mentioned case officer.

Yours faithfully

Julian Edwards

Development Manager

for and on behalf of

LLINOS QUELCH, BA (Hons), MSc, MRTPI

HEAD OF PLANNING