

Dear Sir or Madam,

REQUEST FOR A SCREENING DIRECTION – PROPOSED 50MW SOLAR FARM AT MYNYDD EMROCH, PORT TALBOT

I write on behalf of Collingwood Street Solar Limited to request a Screening Direction under Regulation 31 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (the EIA Regulations), to establish if a planning application for the above proposed development should be accompanied by an Environmental Statement.

The EIA Regulations state that requests for Screening Directions shall be accompanied by a plan to identify the land, a brief description of the nature and purpose of the proposal and, if possible, effects on the environment. The following commentary provides a description of the proposals and a site location drawing is attached for reference purposes (Drawing No. **ARM1008/04/01**).

As the scheme comprises an electricity generating station with a potential generating capacity of between 10MW and 350MW, it falls within the definition of a 'Development of National Significance' (DNS) under section 4 of the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016, for the purposes of section 62 (D) of the Planning (Wales) Act 2015 ("the Wales Act).

Introduction

Future Wales: The National Plan 2040 (Adopted February 2021) is the national plan that sets the direction of development in Wales to 2040. It states:

Wales can become a world leader in renewable energy technologies. Our wind and tidal resources, our potential for solar generation, our support for both large and community scaled projects and our commitment to ensuring the planning system provides a strong lead for renewable energy development, mean we are well placed to support the renewable sector, attract new investment and reduce carbon emissions.

Future Wales sets the following ambitious targets for the generation of renewable energy:

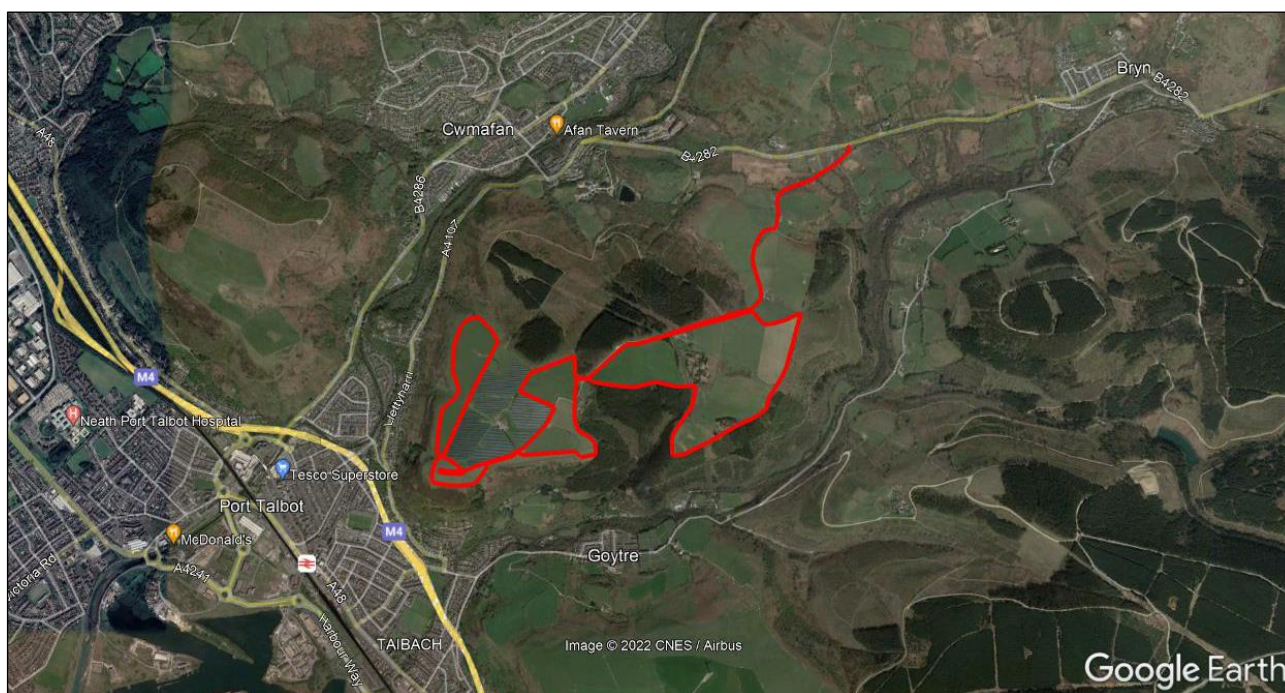
- For 70% of electricity consumption to be generated from renewable energy by 2030.
- For one gigawatt of renewable energy capacity to be locally owned by 2030.
- For new renewable energy projects to have at least an element of local ownership from 2020.

Solar farms are a simple and established technology providing a source of safe and clean energy which produce zero emissions when in operation. Solar energy is not only sustainable; it is renewable meaning that we will never run out of it. Solar also enjoys the highest levels of public support for renewable energy in the UK, with 85% of the public in favour¹. Solar farms are an effective and unobtrusive way of creating the electricity we all use, with the panels having a low visual impact on the local landscape and creating no noise, pollution, bi-products or emissions.

The Site

The proposal site covers a total area of approximately 72.3 hectares across four parcels of grazing land, situated on an elevated plateau, located c. 550m to the north of the village of Goytre and c. 1.4km to the south of the village of Cwmafan. Beyond the M4 which runs to the south-west of the site is Port Talbot which is located approximately c. 900m from the site. The site location is presented on Drawing No. **ARM1008/04/01** and **Figure 1** below.

Figure 1: Site Location



The proposed site and surrounding areas are rural in nature, characterised by agricultural land and Margam Forest to the north and south. There are a number of farmsteads towards the north and south of the site.

Although situated within a rural context, the site and surrounding area are influenced by industrial infrastructure. Between two of the western most parcels of the site is an existing solar farm (planning permission ref. P2014/0567) that has been operational since 2016, as shown on the above image. In addition,

¹ DECC Public Attitudes Tracker March 2019 – Wave 31

within and around the site there are overhead power lines and collinear antenna masts. A wind farm is located on the elevated plateau to the south of the site and Port Talbot Steel Works are located in the valley which is clearly visible from the site. See **Figures 2 and 3** below for photos of the site and existing infrastructure.

There is an adopted highway from Pen-y-Cae to the south of the proposal site. There is also a restricted byway from the north off the B4282.

Figure 2: Photograph of the existing solar farm and overhead powerlines



Figure 3: Photograph of the centre of the site looking south (note the turbines, overhead lines and Steelworks)



The Proposal

Collingwood Street Solar Limited is seeking to develop a solar farm across approximately 72.3 hectares of land with the solar generation having a maximum export capacity of 50MW of electricity, enough to power nearly 14,900 homes per year and offset approximately 14,900 tonnes of CO₂ every year, the equivalent of taking over 5,700 cars off the road².

The proposal will comprise the following:

- Photovoltaic (PV) panels;
- Mounting frames - matt finished small section metal structure;
- Scheme of landscaping and biodiversity enhancement;
- Inverters and transformers (housed in prefabricated containers) and associated cabling (largely below ground);
- 132kV Distribution Network Operator (DNO) substation compound along with associated infrastructure;
- New replacement pylon adjacent to the proposed substation;
- Deer fencing, sympathetic to the area, and infra-red CCTV (CCTV cameras would operate using motion sensors and would be positioned inward only to ensure privacy to neighbouring land and property);
- Temporary set down area;
- Internal service roads; and
- Site access for the construction and operational phases.

Each PV panel measures approximately 0.8m to 1.2m wide and 1.6m to 2m in length and will be secured to a simple metal framework that will be arranged in rows aligned east to west. The highest part of the panel will be no greater than 3m from the ground. To secure the site, a security fence approximately 2 metres high will be erected around the site and CCTV coverage will be provided. Typically, deer fencing is used to provide a less obtrusive visual element into the landscape.

Whilst the proposal site area will total approximately 72.3ha, the solar panels are distributed at a ratio of between 40 to 60% (ground cover ratio). This figure is dependent on local topography and other environmental requirements to be determined through the survey and assessment work. The anticipated construction programme is expected to take 6 months plus an additional period of 4 to 6 months to commission and energise the facility.

A substation is proposed which will enable electricity generated on site to the distribution network. The proposed point of connection is to the overhead 132kV line that runs over the proposal site. A new replacement pylon, located adjacent to the proposed substation, is required as part of the grid connection works.

² The estimated projections for carbon saving, homes powered and car equivalent that could be removed from the road are based on the following assumptions:

1. Assumes annual average domestic household power consumption is 3,578kWh
2. Assumes 0.28 kg of CO₂ saved per kWh electricity supplied
3. Assumes the average car emits 2.6 tonnes/year

Alongside renewable energy generation key objectives of the proposal are to enhance biodiversity value and maintain, albeit at a reduced scale, agricultural production. This and the need for any planting to enhance landscape character and reduce potential impacts to visual amenity will be informed by the ecological survey works and the landscape and visual impact assessment. The proposal will have a lifespan of 40 years, after which all equipment will be removed from the site and the land will continue to be used for agriculture and biodiversity.

EIA criteria

The EIA Regulations contain two development schedules (Schedule 1 development and Schedule 2 development). Schedule 1 contains a list of development where EIA is mandatory. Although solar farms are not specifically listed under either Schedule 1 or Schedule 2 developments of the EIA Regulations, Schedule 2 refers to “*Energy Industry*” categories and it is considered that the proposal falls within the category of “*industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1)*”. The applicable threshold for consideration of Schedule 3 criteria is if the site exceeds 0.5 hectares.

The Schedule 3 selection criteria for screening Schedule 2 development are considered below.

Characteristics of development

- a) Whilst the site of the proposal covers a significant area, the limited height of the panels (top of panel less than 3m above ground level), their non-intrusive structure and ephemeral nature means that they will not have a significant environmental impact. The construction and operational phases do not include any complex or hazardous works or operations and will not lead to any potential adverse environmental effects;
- b) The site is situated within a rural context although the site and surrounding area is influenced by industrial infrastructure. There are several farms in the locality, and an existing solar farm is located between two of the western most parcels of the site. In addition, within and around the site there are overhead power lines and collinear antenna masts and a wind farm is located on the elevated plateau to the south of the site. Whilst there is potential for cumulative effects with the existing solar farm, the topography and in-situ vegetation reduces the likelihood of any potential impacts. The characteristics of the proposed solar farm are unlikely to lead to significant effects on nearby farms or identified infrastructure;
- c) The proposed development will sustainably use solar power to generate renewable electricity over an anticipated 40 year lifespan, once constructed the solar farm requires limited maintenance. Furthermore, on decommissioning the majority of materials can be re-used or recycled;
- d) During the lifespan little or no waste will be generated during energy generation. Solar farms are at the leading edge of zero emission energy generation;
- e) The development would not create pollution or nuisance given the nature of the equipment proposed on site;
- f) The scale and nature of the proposal could not lead to major accident and / or disaster and would help to reduce climate change; and,

- g) The development would not involve the application of substances or technologies that would create a significant risk to human health.

Location of development

- a) The proposed site is currently used as grazing land and when the solar farm is operational, agricultural practices will still be able to continue, albeit at a reduced scale. The proposal site is allocated in the Neath Port Talbot County Borough Council Local Development Plan (2011-2026) as a Special Landscape Area, outside settlement limits and therefore within the 'open countryside' and within a Minerals Safeguarding Area Category 1 Sandstone Resource.
- b) The proposal will have a lifespan of approximately 40 years, after which all equipment will be removed from the site and the land will continue to be used for agriculture and biodiversity.
- c) There are no statutory ecological designations located within 2km of the site.

The site is within Flood Zone A and therefore has a low risk of flooding.

The nearest Scheduled Monument to the site is the Iron Age Hillfort, Pen-y-Castell which lies approximately 1km to the north of the site. The nearest Listed Buildings to the site are Holy Cross Church and Velindre Bridge both of which are Grade II listed and located approximately 700m south of the western edge of the site and 800m south-west of the western edge of the site.

There is a single Public Right of Way that runs beside and through several of the proposed solar deployment areas ref. 40/3/1. The PRow starts from the south-west and continues north-east between the boundaries of the proposal site and Margam Forest as a restricted byway ref. 41/1.PT/3, then ref. 10/1.PT/2.

The nature of the proposal will provide limited opportunity to create significant environmental effects on identified receptors.

Types and characteristics of the potential impact

- a) Whilst the total site area will measure approximately 72.3ha, the construction of and the operational nature of a solar farm is unlikely to significantly affect an area of population;
- b) Due to the nature of the proposal any impacts are not considered to be likely or significant;
- c) The development site would not cross or impact upon local authority boundaries as impacts beyond the site boundary would be limited in extent;
- d) Alongside renewable energy generation key objectives of the proposal are to enhance biodiversity value and maintain, albeit at a reduced scale, agricultural production. As such the magnitude or complexity of any impacts resulting from the proposal would not be significant;
- e) The appropriate technical assessments to accompany any planning application will demonstrate that any potential impacts will be limited;
- f) Once operational the solar farm will require only limited maintenance, therefore negligible or no impacts are anticipated. Furthermore, as part of the decommissioning of the site all equipment will be removed and the land will continue to be used for agriculture and biodiversity;

- g) The site is situated within a rural context although the site and surrounding area is influenced by industrial infrastructure. There are several farms in the locality, and an existing solar farm is located between two of the western most parcels of the site. Whilst there is potential for cumulative effects with the existing solar farm, considering the topography and the in-situ vegetation from receptors, any potential impacts will be minimal. The characteristics of the proposed solar farm are unlikely to adversely affect nearby farms or properties. Furthermore, appropriate technical assessments to accompany any planning application will consider potential impacts from the proposal and provide mitigation where necessary;
- h) The proposal is for a solar farm with a lifespan of 40 years and during this time 596,000 tonnes of carbon will be off set and significant benefits to local biodiversity will be made. After this time equipment can be removed and the land will continue to be used for agriculture and biodiversity. Any adverse effects will be mitigated through a comprehensive scheme of mitigation.

It is therefore considered that the characteristics of the proposed development (as detailed in Schedule 3) are not likely to have the potential for 'significant' environmental effects and thus would not constitute EIA Development.

Notwithstanding the above, the planning application submission documents will consist of the following key documents and technical assessments:

- Supporting Statement including the planning policy appraisal;
- Design and Access Statement;
- Drawings including:
 - general site layout;
 - application boundary plan;
 - panel layout and mounting systems;
 - infrastructure details (elevations of transformers/inverter/substation cabins);
 - fencing and security arrangements; and
 - surface water drainage provisions.

Appropriate technical and environmental assessments will be provided to support the planning application:

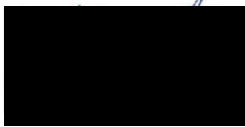
- Landscape and Visual Impact Assessment;
- Cultural Heritage Assessment;
- Ecological Appraisal;
- Agricultural Land Classification Report;
- Flood Consequences Assessment & Drainage Management Strategy;
- Transport Assessment & Construction Traffic Method Statement;
- Noise Assessment; and
- Glint & Glare Assessment.

Pre-application consultation will be undertaken in accordance with the Planning (Wales) Act 2015.

In conclusion, with regards to all aforementioned factors, we respectfully request PEDW's formal response on the nature of the development in the form of a Screening Direction.

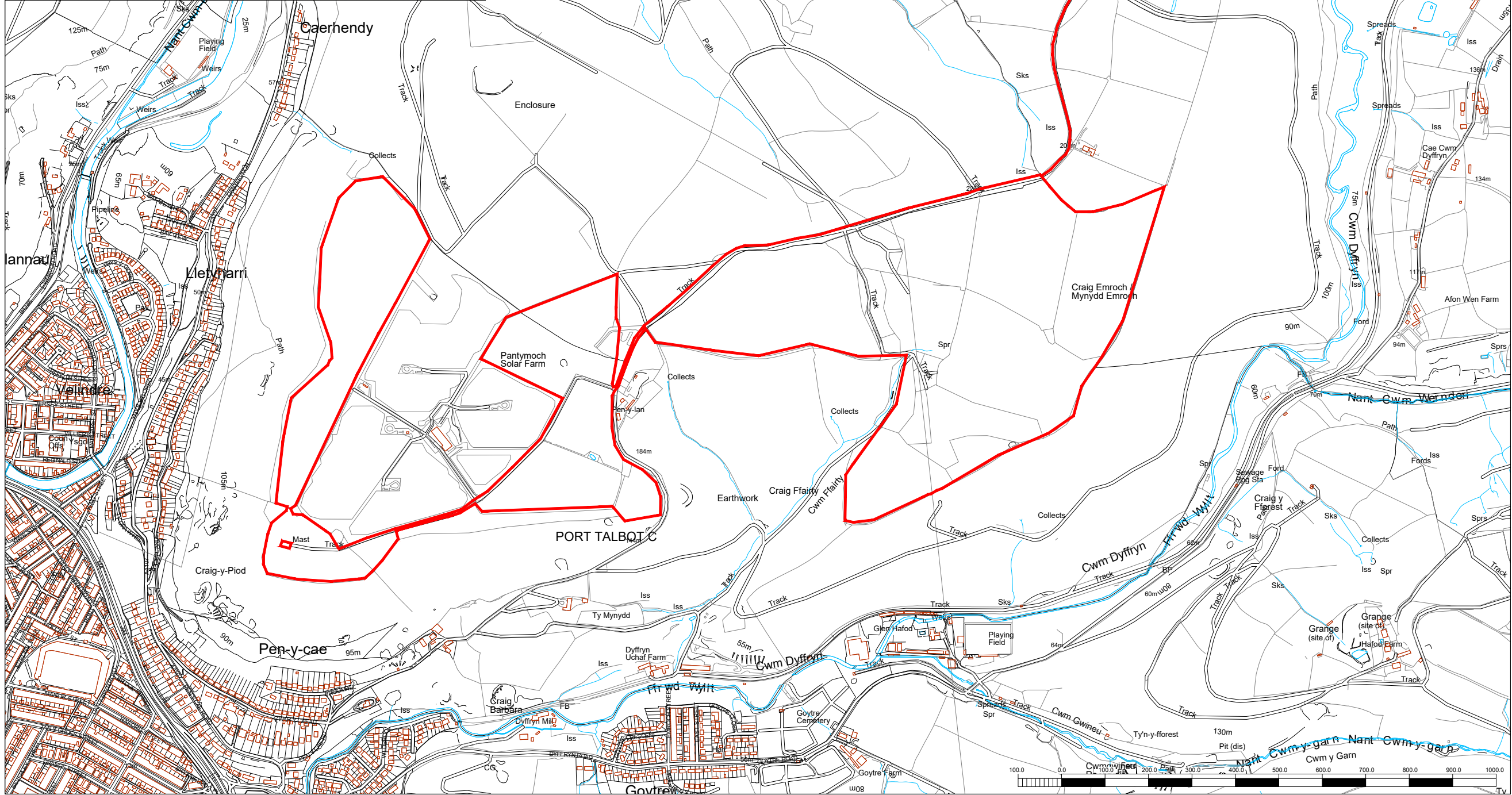
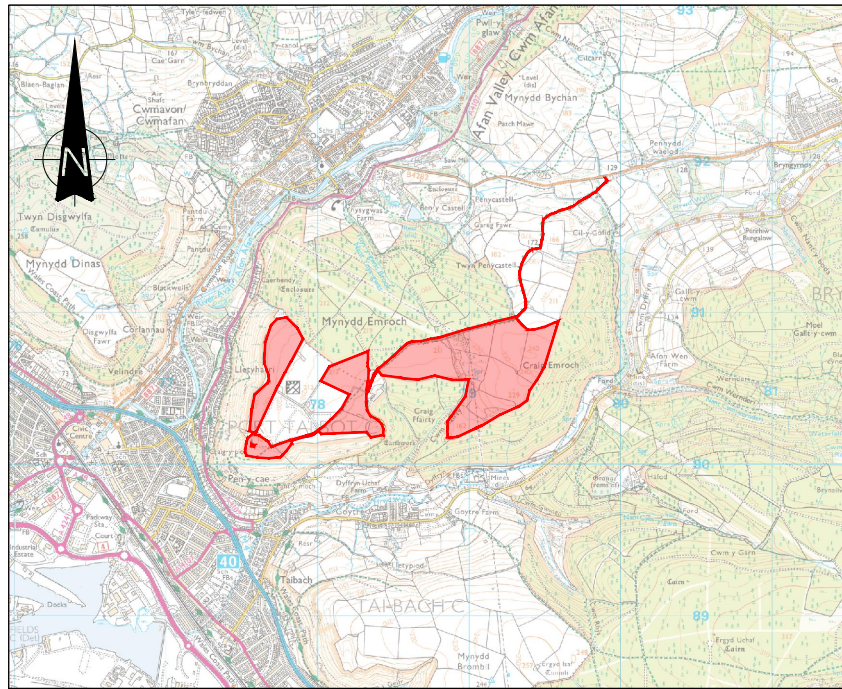
We look forward to receiving an acknowledgement of this request. If you would like to discuss any of the above matters, please contact the undersigned.

Yours faithfully,

A black rectangular box redacting the signature of James Cook.

James Cook
Associate Planner
For and on behalf of Sirius Planning Ltd

ENC – ARM1008/04/01 – Site Location Plan



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KEY
SITE BOUNDARY

REV	DESCRIPTION	DATE	BY
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CLIENT



4245 Park Approach, Thorpe Park, Leeds. LS15 8GB. 0113 264 9960

JOB TITLE
MYNYDD EMROCH
SOLAR FARM

DRAWING TITLE
SITE LOCATION AND
PROPOSAL SITE BOUNDARY

DRAWN	DATE	APPROVED	DATE
S.T	22/12/2022	J.C	22/12/2022
SCALE	SHEET	DRAWING NUMBER	REVISION
1:10,000 1:50,000	A3L	ARM1008/04/01	0