

EIA Scoping Direction

DNS CAS-03721-J2H3Y3: Afon Ddaw Solar and Energy Storage Project

06/03/2025

Prepared by:

Georgia Peters MSc

Contents

1. Introduction	3
2. Site Description	3
3. Proposed Development.....	4
4. Consultation	4
5. Environmental Impact Assessment Approach.....	4
5.1 Baseline	5
5.2 Reasonable Alternatives	5
5.3 Currency of Environmental Information.....	5
5.4 Cumulative Effects	6
5.5 Mitigation.....	6
5.6 Population and Human Health	7
5.7 Transboundary Effects	7
5.8 Topics Scoped In but not subject to a standalone chapter	7
6. Environmental Impact Assessment Aspects	7
6.1 Aspects Scoped In	7
Population (not as a standalone chapter).....	7
Transport.....	7
Human Health (not as a standalone chapter).....	7
Land	7
Soil	7
Risk of Major Accidents.....	7
Landscape and Visual	7
Ecology and Biodiversity	7
Historic Environment	8
Climate Change	8
Hydrology and Flood Risk	8
Noise and Vibration.....	8
7. Table 1: Planning and Environment Decisions Wales Comments.....	9
8. Other Matters	25
8.1 Changes to PPW	25
8.2 Updated Guidance from the Design Commission for Wales	25
8.3 Habitats Regulation Assessment	25
8.4 SuDS Consent	26

This Scoping Direction is provided on the basis of the information submitted to Planning and Environment Decisions Wales on 17 December 2024, in addition to consultation responses received. The advice does not prejudice any recommendation made by an Inspector or any decision made by the Welsh Ministers in relation to the development, and does not preclude the Inspector from subsequently requiring further information to be submitted with the submitted DNS application under Regulation 24 of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) (“The 2017 Regulations”).

1. Introduction

Planning and Environment Decisions Wales (PEDW) received a request under Regulation 33 of the 2017 Regulations for a Scoping Direction in relation to a proposed development for a solar and energy storage project across ten sites between Junction 34 of the M4 and West Aberthaw in the Vale of Glamorgan by Lightsource Renewable UK Developments Ltd.

The request was accompanied by a Scoping Report (SR) and appendices ‘Afon Ddaw Solar and Energy Storage Project - Request for Scoping Direction’ dated December 2024, that outlines the proposed scope of the Environmental Statement (ES) for the proposed development. The Scoping Report is available via the planning casework portal:

<https://planningcasework.service.gov.wales/searchresults?q=03721>

Planning and Environment Decisions Wales (PEDW) is authorised to issue this Scoping Direction on behalf of the Welsh Ministers.

This Direction has been prepared in accordance with the requirements of the 2017 Regulations as well as current best practice towards preparation of an ES. In accordance with the 2017 Regulations PEDW has consulted on the SR and the responses received from the consultation bodies have been duly considered in adopting this Direction.

2. Site Description

The development is proposed to be located across ten sites, most of which are located within the administrative boundary of the Vale of Glamorgan Council and a small portion of the north of the site falling within the administrative boundary of Rhondda Cynon Taf County Borough Council.

The Proposed Development comprises ten areas. Nine of the proposed areas lie between Junction 34 of the M4 and St Athan in the Vale of Glamorgan and are allocated for the provision of solar panels and associated ancillary development. The remaining Site comprises the proposed Battery Energy Storage System (‘BESS’) facility with ancillary equipment and associated cables, located to the north of the Aberthaw Power Station. The Site also includes an indicative cable route corridor within which cables will be laid to connect each PV area to the point of connection at Aberthaw 275 kV Substation.

Further information is available in section 2.1 of the SR.

3. Proposed Development

The proposal as described in the SR is for a solar photovoltaic electricity generating station ('solar farm') and associated ancillary development, with an installed generation capacity of up to 249 MW across 9 PV Areas together with a battery energy storage system ('BESS'), ancillary equipment and associated cables with an export capacity of 249 MW

Further information is available in section 2.2 of the SR.

The scope of the EIA should include all elements of the development as identified in the SR, both permanent and temporary, and this Scoping Direction is written on that basis.

In the ES, any maps, drawing and illustrations that are proposed to describe the project should be designed in such a way that they can be overlaid with drawings and illustrations produced for other sections.

In line with the requirements of Regulation 17 and Schedule 4 to the 2017 Regulations, any reasonable alternatives considered should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed the choices made.

4. Consultation

In line with Regulation 33(7) of the 2017 Regulations, formal consultation was undertaken with the following bodies:

- Vale of Glamorgan Council - Local Planning Authority (VoGC)
- Rhondda Cynon Taf County Borough Council – Local Planning Authority (RCTCBC)
- Natural Resources Wales (NRW)
- Cadw
- Soil Policy Division (LQAS) – Welsh Government
- Transport Directorate Welsh Government
- Dŵr Cymru Welsh Water
- The Coal Authority
- The Health and Safety Executive
- South Wales Fire and Rescue
- Cardiff Airport

Additional consultation was undertaken with:

- Cardiff Council (Neighbouring Authority)

Responses received are included in **Appendix 1**.

5. Environmental Impact Assessment Approach

The Applicants should satisfy themselves that the ES includes all the information outlined in Schedule 4 of the 2017 Regulations. In addition, the Applicant should ensure that the Non-Technical Summary includes a summary of all the information included in Schedule 4. Consider a structure that allows the author of the ES and the appointed Inspector and Decision Maker to readily satisfy themselves that the ES contains all the information specified Regulation 17 and

Schedule 4 of the 2017 Regulations. Cross refer to the requirements in the relevant sections of the ES, and include a summary after the Contents page that lays out all the requirements from the Regulations and what sections of the ES they are fulfilled by.

As the assessments are made, consideration should be given to whether standalone topic chapters would be necessary for topics that are currently proposed to be considered as part of other chapters, particularly if it is apparent that there are significant effects and a large amount of information for a particular topic.

There may also be topic areas scoped out of the ES where the developer may wish to include application documents that sit outside of the ES and provide information that will support their consultation(s) and the decision-making process. The developer is encouraged to liaise with key consultees regarding non-ES application documents which are not a legislative requirement of the DNS regime. If agreement cannot be reached over non-ES application documentation, then the developer may wish to explore whether PEDW can help provide clarity via its statutory pre-application advice service.

The ES should focus on describing and quantifying significant environmental effects. Policy considerations / arguments relating to those impacts should be addressed in other documentation supporting the application (e.g. a Planning Statement), which cross references the ES where necessary. This does not imply that ES chapters should not be prepared in accordance with relevant advice in policy documents (e.g. Technical Advice Notes), rather that the ES should concentrate on identifying significant effects on the environment rather than dealing with policy arguments or exhaustively listing policies.

5.1 Baseline

Schedule 4 of the 2017 Regulations states that the 'baseline scenario' is "A description of the relevant aspects of the **current** state of the environment" (emphasis added). The baseline of the ES should reflect actual current conditions at that time.

5.2 Reasonable Alternatives

In line with the requirements of Regulation 17 and Schedule 4 to the 2017 Regulations, any reasonable alternatives studied by the Applicant should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed the choices made.

It is worth bearing in mind that under the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations") unless it can be clearly shown to the Welsh Ministers that the project would have no adverse effect on the integrity of any designated sites, it would have to be shown that there is no feasible alternative solution. Further advice regarding the Habitats Regulations is provided in the final chapter of this Scoping Direction.

5.3 Currency of Environmental Information

For all environmental aspects, the applicant should ensure that any survey data is as up to date as possible and clearly set out in the ES the timing and nature of the data on which the assessment has been based. Any study area applied to the assessments should be clearly defined. The impacts of construction, operation and decommissioning activities should be considered as part of the assessment where these could give rise to significant environmental

effects. Consideration should be given to relevant legislation, planning policies, and applicable best practice guidance documents throughout the ES.

The ES should include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters. Where professional judgement has been applied this should be clearly stated.

The ES topic chapters should report on any data limitations, key assumptions and difficulties encountered in establishing the baseline environment and undertaking the assessment of environmental effects.

5.4 Cumulative Effects

The Planning Inspectorate's guidance for Nationally Significant Infrastructure Projects – Advice on Cumulative Effects Assessment sets out a staged process for assessing cumulative impacts which the Applicant should follow when preparing the list of projects for inclusion in the ES: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment>

There may be other types of development that could have cumulative impacts with the proposal, and it should not be assumed that the consideration of cumulative impacts can be restricted to other renewable energy proposals.

Effects deemed individually not significant from the assessment, could cumulatively be significant, so inclusion criteria based on the most likely significant effects from this type of development may prove helpful when identifying what other developments should be accounted for. The criteria may vary from topic to topic.

Best practice is to include proportionate information relating to projects that are not yet consented, dependent on the level of certainty of them coming forward.

All of the other developments considered should be documented and the reasons for inclusion or exclusion should be clearly stated. Professional judgement should be used to avoid excluding other development that is close to threshold limits but has characteristics likely to give rise to a significant effect; or could give rise to a cumulative effect by virtue of its proximity to the proposed development. Similarly, professional judgement should be applied to other development that exceeds thresholds but may not give rise to discernible effects. The process of refinement should be undertaken in consultation with the Local Planning Authorities, NRW, Cadw and other consultees, where appropriate.

The scope of the cumulative assessment should be fully explained and justified in the ES.

5.5 Mitigation

Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured (through legal requirements or other suitably

robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

5.6 Population and Human Health

The Applicant should ensure that the ES addresses any significant effects on population and human health, in light of the EIA Regulations 2017. This could be addressed under the separate topic chapters or within its own specific chapter.

5.7 Transboundary Effects

Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The ES should address this matter as appropriate.

5.8 Topics Scoped In but not subject to a standalone chapter

For such topics it may be helpful to users of the ES if it includes a summary table that signposts the chapters where these matters are addressed.

6. Environmental Impact Assessment Aspects

This section contains PEDW's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. Environmental topics or features are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by PEDW. In accordance with Regulation 17(4)(c) the ES should be based on this Scoping Direction in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report.

PEDW has set out in this Direction where it has/ has not agreed to scope out matters on the basis of the information available at this time. PEDW is content that the receipt of a Scoping Direction should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

6.1 Aspects Scoped In

Subject to the comments provided at Table 1, the following aspects are scoped into the ES:

Population (not as a standalone chapter)
Transport
Human Health (not as a standalone chapter)
Land
Soil
Risk of Major Accidents
Landscape and Visual
Ecology and Biodiversity

Historic Environment
Climate Change
Hydrology and Flood Risk
Noise and Vibration

7. Table 1: Planning and Environment Decisions Wales Comments

ID	Reference in Scoping Report	Issue	Comment
General			
ID.1	Section 5.2	Description of the Development	The applicant's attention is drawn to NRW's comments outlining expectations of what the description of development should include. As outlined in Section 3 above, the scope of the EIA should include all elements of the development as identified in the SR, both permanent and temporary.
ID.2		Grid connection	The SR does not provide any detail on the grid connection. The ES should address the grid connection in a proportionate manner based on the level of certainty as to the likely connection route at the time of the DNS application being made.
ID.3	Paragraph 3.3.19 – 3.3.21	Cumulative Assessment	While developments that have already been built and are operational will form part of the baseline, this does not mean that they should be excluded when considering cumulative effects. Paragraph 5 of Schedule 4 of the 2017 Regulations makes it clear that consideration of cumulative effects should include existing development. As highlighted in Section 5.4 of this Direction, the applicant should follow the advice provided in the Planning Inspectorate's 'Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment'. To ensure a comprehensive assessment in the final ES, the Applicant is advised to liaise with the LPAs on development proposals that should be included in the cumulative assessment, as they will be aware of developments in their area which will need to be considered, which may extend beyond other renewable energy developments. VoGC provide information in Appendix 1 of a proposed battery storage near Aberthaw at Pre-Application Consultation Stage.

ID	Reference in Scoping Report	Issue	Comment
Applicant's proposed Aspects proposed to be scoped out			
ID.4		Planning Policy Context	PEDW agrees that it is not necessary to include a chapter on Planning Policy Context in this ES.
ID.5	Paragraph 4.2.2	Population	PEDW agrees that a standalone chapter is not required, but Population should be addressed in appropriate chapters of the ES. This topic is therefore scoped in to the ES, but not as a standalone chapter.
ID.6	Paragraph 4.2.5 – 4.2.12	Transport	In their response VoGC agrees that Transport can be scoped out for the operational phase of the development. They do not agree however, that transport can be scoped out for the construction and decommissioning phases. The SR acknowledges temporary effects during construction that are proposed to be assessed as part of a Transport Statement and mitigation via a Construction Environment Management Plan (CEMP). VoGC acknowledge that the main arterial routes to the site can accommodate HGV traffic, however little information is provided regarding access to individual field parcels. VoGC note that access would be via country lanes with potentially limited widths and passing opportunities for HGVs. Further survey work is required to determine suitability of these routes to accommodate HGV traffic for an intense and sustained construction period and to investigate the impact. Transport is therefore scoped into the ES for the construction and decommissioning phases. RCTCBC note that there will be limited impact on the highway network within the Council's administrative area. They add that they require submission of a Construction Traffic Management Plan (CTMP) for approval prior to any works commencing on site.

ID	Reference in Scoping Report	Issue	Comment
			The Applicant's attention is drawn to Welsh Governments Transport Directorate's comments in Appendix 1. They advise that solar panels should be positioned and shielded so as not to cause any significant glint or glare to the users of the M4. The applicant's attention is drawn to Welsh Government Transport Directorate's comments in relation to the impact assessment of Abnormal Indivisible Loads movements and to the draft guidance document included with their response at Appendix 1: 'Pulling Together' - Best Practice for Transporting Abnormal Loads in Wales. PEDW recommends the applicant liaises directly with Welsh Government Transport Directorate on the draft abnormal load notifications. If Abnormal Indivisible Load (AIL) deliveries are required, the Applicant must inform the Welsh Government at the earliest opportunity.
ID.7	Paragraph 4.2.3	Human Health	PEDW agrees that a standalone chapter is not required, but Human Health should be addressed in appropriate chapters of the ES. This topic is therefore scoped into the ES, but not as a standalone chapter.
ID.8	Paragraph 4.2.13 – 4.2.16	Land (for example land take)	The SR states that the development is temporary and reversible and suggests that there are no likely significant lasting adverse effects on the quality of the land. VoGC do not agree that Land can be scoped out of the ES for the reasons included in their response in Appendix 1. Their main concern is the risk of impact on the safeguarded mineral reserves. They identify areas of Category 1 and 2 Limestone, Sand, Gravel and Sandstone mineral resources, which indicates reserves of national importance. Whilst the proposed lifetime of the development is 'temporary', 40 years is considered to be a significant amount of time where the land cannot be used to its full agricultural potential. The development may be reversible but extensive

ID	Reference in Scoping Report	Issue	Comment
			decommissioning work will need to take place before the land is restored. It is also noted by VoGC that it is not clear if the battery storage site would be temporary, this is more likely to have permanent characteristics and lasting effects beyond the life of the development. There are also potential impacts on the Mineral Resource Areas identified in the SR and by VoGC. Whilst it is proposed that a Mineral Resource Assessment will be prepared and included as Appendix to the ES, there is currently not enough information to agree to scope out this topic, it is therefore scoped into the ES.
ID.9	Paragraph 4.2.17 – 4.2.20	Soil	LQAS confirm that BMV land is identified on site on the Predictive ALC Map and subsequently a detailed ALC survey is required to confirm grades and distribution. LQAS have been in discussion with the Applicant to discuss survey requirements and is currently undertaking a validation of the ALC survey and will confirm grading on site. LQAS state in their response, included in Appendix 1, that it is highly probable (subject to validation of the ALC survey) that the proposal will involve development of +20ha of BMV agricultural land, and therefore considers that BMV land impact should be scoped into the assessment. The Applicant is directed to LQAS's comments in Appendix 1 regarding the requirements of PPW paragraphs 3.58 and 3.59, information required to be included in the assessment and the Outline Soil Management Plan (oSMP). VoGC note that from their records the application sites contain substantial areas of land predicted to be Grade 3A and above and the battery storage site contains areas predicted to be Grade 1. They add that there is potential for significant ground disturbance to occur as part of the battery storage development.

ID	Reference in Scoping Report	Issue	Comment
			PEDW agrees with LQAS and VoGC that in light of the potential impacts to soil related to construction and decommissioning, the topic should be scoped into the ES.
ID.10	Paragraph 4.2.21 – 4.2.25	Air	It is noted that the main air quality effects are likely to be during construction and, as noted by VoGC in their response, the site is not within an Air Quality Management Area and impacts can be mitigated. PEDW therefore agree that this topic can be scoped out.
ID.11	Paragraph 4.2.26 – 4.2.28	Material Assets	The SR notes that material assets will be considered across a range of topic areas within an ES, in particular the historic environment chapter. PEDW welcomes this approach and agrees this topic can be scoped out as a separate chapter.
ID.12	Paragraph 4.2.29 – 4.2.68	Ground Conditions	VoGC highlight the potential for contaminated land on site cannot be ruled out and there could be risks to human health and the environment as a result of unrecorded contamination. However, they agree that the impacts of the development in this regard are unlikely to be significant and could be mitigated through adoption of best practice methods. NRW highlight that ground conditions should be assessed in relation to ground water vulnerability. This topic should be considered in the Hydrology and Flood Risk Chapter of the ES.
ID.13	Paragraph 4.2.69 – 4.2.73	Risk of Major Accidents	The SR highlights that the development will also comprise of energy storage facilities. PEDW notes that there is a potential fire risk associated with certain types of batteries such as lithium-ion and that safety measures are required in the design to minimise the risk of fire. PEDW considers this to be part of the EIA process in line with Schedule 4 of the EIA Regulations (Wales) 2017. The Applicant's attention is also drawn to advice from the South Wales Fire and Rescue Service regarding fire safety related to large scale Solar Arrays and Battery storage. The proposed development should include adequate measures to ensure that an isolated fire would not become widespread and lead to a major

ID	Reference in Scoping Report	Issue	Comment
			incident. The applicant may consider the submission of a Battery Safety Management Plan confirming that the risks are understood, accounted for and mitigated as far as practicable, in agreement with relevant consultees. The applicant is reminded of the responsibilities set by the Regulatory Reform (Fire Safety) Order 2005. The ES should ensure that risks of accidents are accounted for and mitigated in line with Schedule 4. A proportionate section on this aspect should be included in the ES. The Applicant's attention is drawn to the fact that some solar panels are coated in PFAS (Per- and polyfluoroalkyl substances) which 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 and this should be address in a proportionate manner in the ES. Due to the scale of the development and degree of risk, as well as limited information regarding mitigation measures, PEDW does not agree that Risk of Major Accidents can be scoped out at this stage.
ID.14	Paragraph 4.2.74 – 4.2.78	Arboriculture	PEDW welcomes proposals to retain existing trees and hedgerow networks in addition to development parameters that afford suitable buffers from mature trees. The SR states that a tree quality survey and an Arboriculture Impact Assessment will be submitted to support the application. VoGC include in their comments that the impact on green infrastructure and how the stepwise approach has been adopted should be clearly described and included with the application. This should include any areas lost to highway access provision and cable routes. VoGC add that this impact should be established to inform the ES and the impact of the development on ecology, biodiversity and habitats. The Applicant's attention is drawn to further requirements included in the Council's response in Appendix 1.

ID	Reference in Scoping Report	Issue	Comment
			PEDW agrees with the approach set out in the SR and scopes this topic out of the ES.
Landscape and visual			
ID.15	Chapter 6	Landscape and Visual Impact Assessment (LVIA)	PEDW welcomes that a LVIA will be submitted as part of the ES and is in agreement with the approach as set out in Section 6.4 of the SR. The VoGC highlight that the LVIA should focus on the effects of the proposal on Special Landscape Areas (SLAs), the Llancafarn Landscape of Outstanding Historic Interest and consider the cumulative impact together with existing and consented solar development. The VoGC encourages the developer to obtain pre-application advice and further discussion regarding the detailed scope of the LVIA, to ensure that the scope of assessment is sufficient, and an appropriate set of viewpoints has been established and assessed. VoGC advise that the ES should describe the landscape features and designations of value, together with an assessment of the magnitude of the landscape impacts, based on findings of the LVIA. It is noted that some landscapes are not designated but have a strong rural character which the scale of the proposed development could alter, changing the perception of that landscape. RCTCBC note that whilst the development falls mostly outside of Rhondda Cynon Taf, its impact upon the wider landscape in RCT would be limited and considered significant, sites PV7, PV8 and PV9 are within close proximity to Llanharry, Talygarn and associated designated Conservation Areas and Historic Gardens. They therefore, expect that any ES should demonstrate how those sites would affect overall massing in the immediate landscape and be viewed in the context of the open countryside, nearest developments and heritage assets.
ID.16		Cumulative Landscape Impact	VoGC agree that the assessment of effects should focus on the cumulative impact with other solar farms within the area as noted in the SR. VoG agree that

ID	Reference in Scoping Report	Issue	Comment
			the cumulative impact of proposals with any concurrent DNS applications for solar development should also be considered.
ID.17	Paragraph 6.4.10	Glint and Glare	PEDW welcomes that a Glint and Glare assessment will be completed separately and reviewed as part of the LVIA. VoGC highlight that impact on residential amenity should be considered as part of the assessment. The site is within close proximity to Cardiff Airport. PEDW did not receive a response to the scoping consultation from Cardiff Airport, the Applicant is advised to liaise directly with Cardiff Airport on this matter.
Ecology and Biodiversity			
ID.18		General	In their responses in Appendix 1, VoGC and NRW highlight that the ES should include sufficient information to enable the extent of any environmental impacts arising from the proposed development to be determined, in particular any legally protected species and designated sites. The ES should include a description of all existing natural resources and biodiversity interests in and near to the application site areas and cable routes, with a detailed assessment of any likely impacts of the development. NRW add that evaluation of the impacts should include: direct and indirect; cumulative; short, medium and long term; permanent and temporary; positive and negative; construction, operation and decommissioning phases and impacts on long-term site security of the nature conservation resource. The ES should also describe how avoidance measures have been implemented through the site selection and design process and demonstrate compliance with the stepwise approach advocated in PPW, as well as biodiversity enhancement. VoGC highlight that impact on protected species and important habitats should be considered cumulatively.

ID	Reference in Scoping Report	Issue	Comment
ID.19	Chapter 7 Paragraph 7.4.28	Designated Sites	VoGC notes that the proposed development could impact up to 12 Sites of Local Importance for Nature Conservation (SINC), as well as areas of ancient woodland on or near several of the site areas, and the Cors Aberthin SSSI which is adjacent to PV Area 3. NRW add that all areas should be subject to NVC/Phase 2 to fully understand the nature and value of existing habitats. They also acknowledge the discussion around inclusion of designated site buffers in section 7.4.28. NRW advise that the Applicant Liaises directly with their Cardiff and Vale Environment team to discuss this at the earliest opportunity. Contact details are included in Appendix 1.
ID.20		Waste Management	The Applicant's attention is drawn to NRW's comments in Appendix 1 regarding Waste Management. They provide advice on how any waste produced during construction must be dealt with in order to reduce impact on ecology.
ID.21		Construction Environment Management Plan (CEMP)	NRW and PEDW welcome the proposed inclusion of a CEMP. The applicant's attention is drawn to NRW's comments in Appendix 1, which includes expectations for the CEMP.
ID.22	Section 7.4	Habitats	NRW highlight that any habitat surveys should accord with the JNCC Phase 1 survey guidelines (JNCC (2010) Handbook for Phase 1 habitat survey). They advise that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present. In line with NRW's comments in Appendix 1, the ES must include comprehensive descriptions of the habitats affected to support robust conclusions about their significance for species. The size of any habitats to be impacted should be clearly set out, along with the location and extent/area of any mitigation or compensation areas.

ID	Reference in Scoping Report	Issue	Comment
			The Applicant's attention is drawn to RCTCBC advice regarding grassland habitats and ecological mitigation and enhancement. RCTCBC add that they would appreciate the opportunity to review ecology work provided for PV7 and PV9 at an early stage to comment on recommendations for further work, design and ecological mitigation and enhancement. VoGC note that Arable field margins can be Section 7 habitat (Natural Environment and Rural Communities Act 2006), these habitats may require further consideration in the ES. Further information is provided with VoGC's comments in Appendix 1.
ID.23		eDNA Grassland Fungi Assessment	The Applicant's attention is drawn to RCTCBC's comments in Appendix 1 where they highlight the need for eDNA grassland fungi survey assessment as part of the ecological assessment of DV9. RCTCBC highlight that, experience has shown that short grazed permanent pasture has the potential to support diverse grassland assemblages of ecological significance. PEDW advise that the Applicant liaise directly with the local authority's ecologist on the approach.
ID.24	Section 7.4	Protected Species Surveys	VoGC advise that pre-application advice is sought from the LPA to agree on the detailed scope of these surveys in consultation with the County Ecologist, as well as NRW. NRW state that the site and were necessary land adjacent to the site is subject to assessment to determine the likelihood of protected species being present and affected by the proposals. NRW advise against using desk study survey results alone to scope out certain species or surveys at a development site; absence of a protected species records in an area can be due to no surveys having been carried out in that area and would not necessarily imply absence of the species.

ID	Reference in Scoping Report	Issue	Comment
			NRW advise that, at every development location, alongside a desk study the extended Phase 1 habitat surveys are used to identify habitats present on site, or in proximity to the site, and the habitats present assessed for their suitability to support protected species. Justification for any species surveys that are scoped out should be included in the ES. In line with NRW's comments in Appendix 1, should protected species be confirmed, the ES must identify species-specific impacts, for the species and supporting habitats, in the short, medium and long term; together with any mitigation and compensation measures proposed to offset the impacts identified. NRW also note that the ES should consider conservation status of relevant species and must demonstrate that there will be no detriment to maintenance of favourable conservation status of the species during construction, operation and decommissioning of the scheme. They add that the ES should set out how long-term site security of any mitigation or compensation will be assured. Where the potential for significant impacts on protected species is identified, NRW advocate that Conservation Plan is prepared for the relevant species and include as an Annex to the ES. More detailed advice is included with NRW's comments in Appendix 1.
ID.25	Section 7.4 Paragraph 7.3.4	Terrestrial Ornithology	VoGC note that the development could have significant impact on breeding birds in particular. Targeted species surveys should be undertaken for all species scoped in and undertaken by qualified, licensed ecologists and comply with best practice guidelines. More information is included in NRW's response in Appendix 1. NRW note that there is limited information in the SR relating to survey effort e.g. number of hours per season of vantage point survey, or number of visits for other surveys). They advise that the scope of the surveys should include

ID	Reference in Scoping Report	Issue	Comment
			consideration of breeding Wildlife and Countryside Act 1981, Schedule 1 species, Section 7 species (e.g. curlew) and bird features of any designated sites with functional linkage to the application site.
ID.26	Section 7.4	Bats	NRW welcome further bat surveys, they advise that trees identified to be of moderate or higher potential for bats which are likely to be impacted by the scheme are subject to climbed, endoscope inspection of potential roost features present.
ID.27	Section 7.4	Great Crested Newt (GCN)	NRW advise that surveys for GCN cover all waterbodies within 250 m of each development location. In general, NRW advise using a habitat suitability index (HSI) assessment to determine whether to undertake presence/absence surveys. NRW state that a suite of traditional surveys should be undertaken, where eDNA survey results indicate presence of the species, or are inconclusive. They add that GCN surveys should be undertaken as early in the survey period as possible to maximise change of visiting waterbodies whilst they hold water.
ID.28	Section 7.4	Location of cable route	It is noted that the cable connection route has not been determined. NRW advise that the ES sets out a description of the intended works for the cable route and grid connection including: the route, working width and methods to install the required infrastructure. NRW also advise the stepwise approach is used in consideration of the route selection and therefore advise that cabling route is positioned within highways and through existing hedgerow gaps as much as possible, to avoid impact on habitats. The Applicant's attention is drawn to NRW's comments in Appendix 1 for advice if hedgerow bisecting is unavoidable.
ID.29	Section 7.4	Buffer Zones	NRW welcome the reference to 'protection and buffering of retained habitats and designated sites' and that the extent will be informed by input from NRW. NRW advise buffers of 7 m from break of bank slope to the perimeter fence for watercourses; and for hedgerows and woodlands, buffers of 5 m from the edge of the habitat to the perimeter fence, or solar panels where it is an internal hedgerow.

ID	Reference in Scoping Report	Issue	Comment
ID.30		Fencing	The Applicant's attention is drawn to NRW's comments in Appendix 1 regarding protecting hedgerows and woodlands from grazing stock.
ID.31		Lighting	NRW advise that new and retained green infrastructure should remain unaffected by artificial lighting both during the construction and operation phases of the development. They also advise that the ES includes an assessment of the impacts of any lighting and measures to minimise impacts.
ID.32		Biodiversity Enhancements	In their response in Appendix 1, NRW highlights that it is vital that the design of the development includes robust, well connected green infrastructure corridors. NRW recommend that the scheme includes proposals for positive management and improvement of hedgerows and on-site woodland, restoration and creation of species rich hedgerows and ponds are also encouraged. The Applicant's attention is drawn to NRW's comments in Appendix 1 regarding further recommendations for the scheme in relation to Local biodiversity interests and securing biodiversity enhancements.
Historic Environment			
ID.33	Paragraph 8.2.1	Legislation	The applicant's attention is drawn to Cadw's comments in Appendix 1 regarding The Historic Environment (Wales) Act 2023, which supersedes legislation referred to in paragraph 8.2.1 of the SR.
ID.34	Paragraph 8.3.8 Paragraph 8.3.9	Impact on Historic Assets	In their response, Cadw express considerable concerns about the potential for a direct impact of the cable route on scheduled monument Llanquian Wood Camp GM182. Cadw directs the Applicant to the guidance in section 6.1.24 of PPW and the need for Scheduled Monument Consent (SMC) to be granted if there will be a direct impact. While the consenting strategy is a matter for the applicant, it would be possible to apply for SMA as a secondary consent to the main DNS application. Cadw state that once the optioneering process is completed, they are available to determine if an ASIDOHL2 assessment is required and include that they

ID	Reference in Scoping Report	Issue	Comment
	Paragraph 8.3.11		should also be consulted on the Historic Landscape Character Areas that should be included in the assessment. Once the preferred cable routes and extents of the PV areas and BESS areas are confirmed, Cadw expect a stage 1 assessment to be carried out for all designated historic assets inside 3km and the Zone of Theoretical Views, which will determine the need for stages 2 and 4 to be carried out for specific historic assets. The results of the stage 1 assessment should be included as an appendix in the EIA. VoGC advise that pre-application advice is sought from the LPA, Cadw and Heneb to inform the scope of the scope of the surveys to be undertaken to assess the impact on historic assets.
ID.35	Paragraph 8.3.13	Undesignated Archaeological Sites	In their response, Cadw agree that a geophysical survey and archaeological trial trenching may be required to understand the extent and significance of undesignated archaeological sites. Cadw expect that these works will be undertaken before the completion of the EIA so that their results can be included in the assessment of the impact on the proposed development.
Climate Change			
ID.36	Chapter 9	Climate Change	PEDW notes that Climate Change is scoped into the ES and agrees with the approach set out in the SR. The ES should provide robust justification for the matters scoped out.
Hydrology and Flood Risk			
ID.37	Paragraph 10.4.7 – 10.4.14	Flood Risk	NRW confirm that part of the site is within Zone CR of the Development Advice Map (DAM) contained within Technical Advice Note (TAN) 15: Development and Flood Risk (2004), and the Flood Map for Planning (FMfP) identified the part of the site to be at risk of flooding and falls into Flood Zone 2 and 3 Rivers/Sea.

ID	Reference in Scoping Report	Issue	Comment
			They also note that the proposed solar farm and battery storage is considered to be less vulnerable development. VoGC also note that the application sites include areas known to be at the highest risk of fluvial flooding (Flood Zone C2/FMfP Zone 3). They add that the sensitivity of the development to flooding, risks and degree of off-site impacts arising from development in the floodplain should all be described in the ES, as well as any proposed flood mitigation measures.
ID.38	Paragraph 10.5.2	Flood Consequence Assessment (FCA)	NRW welcome the intention to undertake a FCA. They highlight that the criteria for the FCA, which should be undertaken by a suitable qualified person carrying an appropriate professional indemnity, are given in Section 7 and Appendix 1 of TAN15. The FCA should be proportionate to the development proposed. NRW direct the Applicant to their website, which contains technical advice and recommendations.
ID.39	Paragraph 10.4.5	Main Rivers	NRW note that several main rivers run through the development sites, including the River Thaw, Nant Tregof and Newton Moors. NRW add that in some instances, a flood risk activity permit (FRAP) may be required, for example to construct a structure on the bank of a main river. Any works affecting an ordinary watercourse may require an Ordinary Watercourse Consent form from the relevant Lead Local Flood Authority.
ID.40		Peat	RCT identify high potential that some for the proposed solar farm development may affect degraded peat bog habitat. As per the requirements of PPW12 regarding peatland assessment and consideration, as assessment of peat impacts is suggested for PV7 by RCT, as well as peat and hydrological impacts on the adjacent peatland habitat of Ystradowen Bog. PEDW agrees with this approach.
ID.41	Section 10.5	Groundwater protection	NRW state in their response that their mapping system shows groundwater vulnerability across the site is medium-high. The underlying bedrock is defined as a principal aquifer and a source protection zone is located within the part of the western area of the proposed development.

ID	Reference in Scoping Report	Issue	Comment
			NRW do not agree with section 10.5 of the SR that contamination from the BESS and solar panel infrastructure should be scoped out. The Applicant's attention is drawn to NRW's comments in Appendix 1 which includes assessment and design requirements relating to this matter.
ID.42		Decommissioning	NRW advise that a Preliminary Decommissioning Assessment should be produced. The Preliminary Decommissioning Assessment should set out the actions and activities required to dismantle the infrastructure but also set out why particular infrastructure may be left in perpetuity. e.g., buried in the ground, such as buried cabling, and what the implications of this could be in terms of the potential to release hazardous chemicals into the environment. NRW highlight the possibility that the insulating properties of sections of the buried cabling reduce which may require the cabling to be removed and replaced. NRW advise this is considered within the ES. NRW add that if it cannot be evidenced that cabling left in perpetuity in the ground will not release harmful chemicals into the environment then remnant cabling should be removed.
Noise and Vibration			
ID.43		Noise and Vibration	PEDW agrees that noise and vibration should be scoped into the ES due to the potential significant affects on amenity. VoGC agree with the scope set out in the SR, although they add that it should be made clear that any plant associated with the photovoltaic (PV) areas is distant enough from sensitive receptors as to have no significant impacts.

8. Other Matters

This section does not constitute part of the Scoping Direction, but addresses other issues related to the proposal.

8.1 Changes to PPW

On 11 October 2023 the Welsh Government introduced changes to Chapter 6 of PPW relating to:

- Green Infrastructure,
- Net Benefit for Biodiversity and the Step-wise Approach,
- Protection for Sites of Special Scientific Interest, and
- Trees and Woodlands.

Details are available in the relevant 'Dear Chief Planning Officer' letter:

<https://www.gov.wales/addressing-nature-emergency-through-planning-system-update-chapter-6-planning-policy-wales>

These changes have now been consolidated into a new edition of PPW (ed. 12), published on 07 February 2024: <https://www.gov.wales/planning-policy-wales>

8.2 Updated Guidance from the Design Commission for Wales

On 23 November 2023 the Design Commission for Wales published their updated guidance "Designing for Renewable Energy in Wales". The guidance is available online:

<https://www.gov.wales/designing-renewable-energy-wales>

8.3 Habitats Regulation Assessment

[The Conservation of Habitats and Species Regulations 2017](#) require competent authorities, before granting consent for a plan or project, to carry out an appropriate assessment (AA) in circumstances where the plan or project is likely to have a significant effect on a European site (either alone or in combination with other plans or projects). The competent authority in respect of a DNS application is the relevant Welsh Minister who makes the final decision. It is the Applicant's responsibility to provide sufficient information to the competent authority to enable them to carry out an AA or determine whether an AA is required.

When considering whether or not significant effects are likely, applicants should ensure that their rationale is consistent with the [CJEU finding](#) that mitigation measures (referred to in the judgment as measures which are intended to avoid or reduce effects) should be assessed within the framework of an AA and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site when determining whether an AA is required ('screening'). The screening stage must be undertaken on a precautionary basis without regard to any proposed integrated or additional avoidance or reduction measures. Where the likelihood of significant effects cannot be excluded, on the basis of objective information the competent authority must proceed to carry out an AA to establish whether the plan or project will affect the integrity of the European site, which can include at that stage consideration of the effectiveness of the proposed avoidance or reduction measures.

Where it is effective to cross refer to sections of the ES in the HRA, a clear and consistent approach should be adopted.

The Planning Inspectorate's guidance for Nationally Significant Infrastructure Projects – [Advice Note 10: Habitat Regulations Assessment relevant to Nationally Significant Infrastructure Projects](#) may prove useful when considering what information to provide to allow the Welsh Ministers to undertake AA.

8.4 SuDS Consent

Whilst a separate legislative requirement from planning permission, the Applicant's attention is drawn to the statutory SuDS regime that came into force in Wales in January 2019. The requirement to obtain SuDS consent prior to construction may require iterative design changes that influence the scheme that is to be assessed within the ES and taken through to application. As such, it is recommended that the applicant contact the local SuDS Approval Body early on.

Appendix 1: Consultation Responses

THE VALE OF GLAMORGAN COUNCIL

Dock Office, Barry Docks, Barry. CF63 4RT

Telephone number: [REDACTED]

My Ref.
2024/01219/OBS

When telephoning please ask for:
Administration

Crown Buildings,
Cathays Park,
Cardiff,
CF10 3NQ

13 February 2025

Dear Sir/Madam,

Location : Approximately 9 sites between Junction 34 of the M4 and St Athan in the Vale of Glamorgan. (DNS CAS-03721-J2H3Y3 - Afon Ddaw Solar and Energy Storage Project)
Proposal : Solar Farm with Battery Energy Storage System

I refer to your letter registered on 18 December 2024 enclosing details of the above development and inviting this Authority to comment on the proposal.

Consideration has been given to this matter and I would inform you that the Local Planning Authority would advise Pedw that the Environmental Statement submitted should address the matters set out in the attached Officer's Report.

Yours faithfully,

Ian Robinson

[REDACTED]

Head of Sustainable Development

APPLICANT:**AGENT:** Crown Buildings, Cathays Park,, Cardiff,, CF10 3NQ

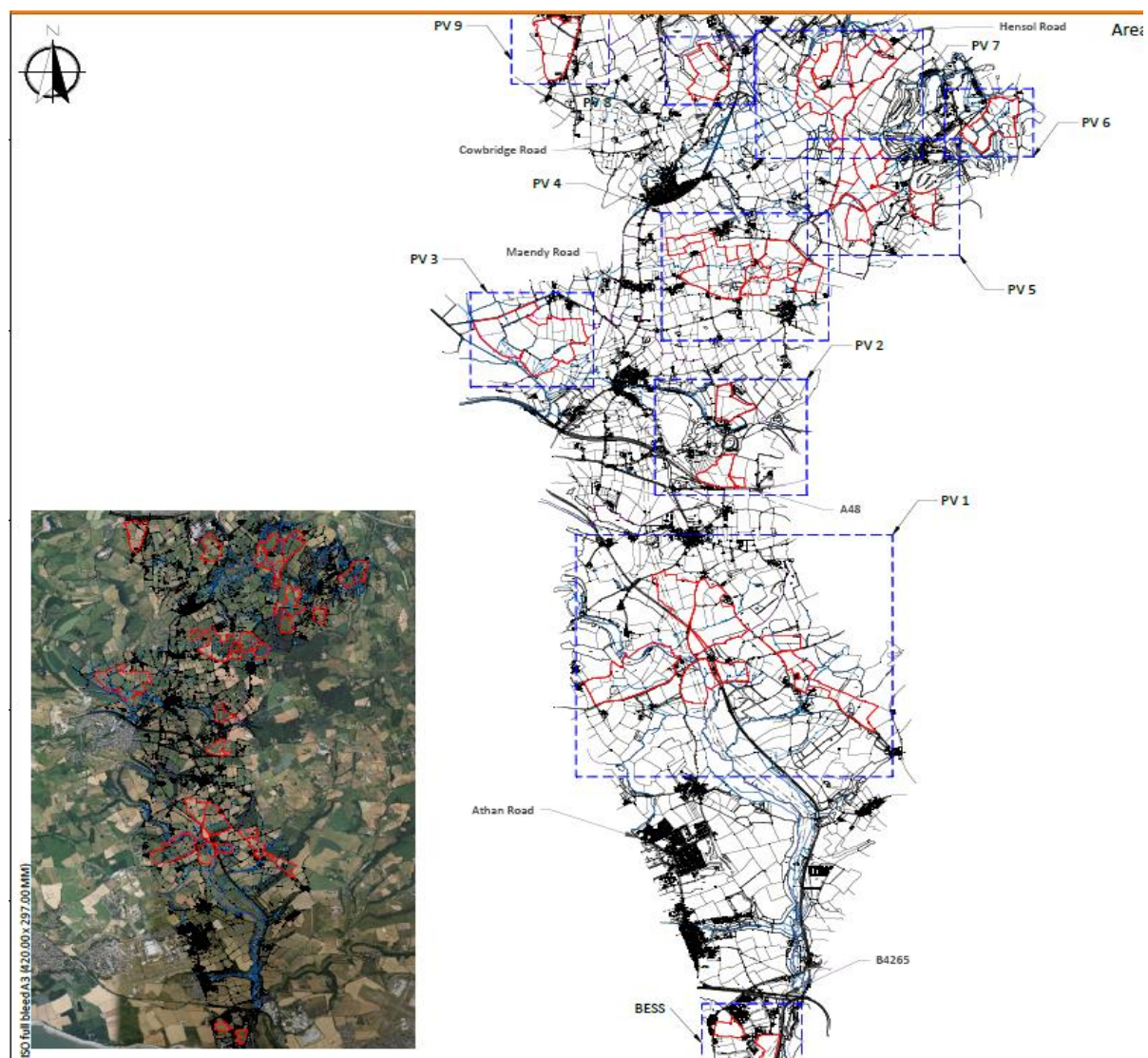
Approximately 9 sites between Junction 34 of the M4 and St Athan in the Vale of Glamorgan. (DNS CAS-03721-J2H3Y3 - Afon Ddaw Solar and Energy Storage Project)

Solar Farm with Battery Energy Storage System

SITE AND CONTEXT

The application site relates to several disparate field parcels mostly located within the Vale of Glamorgan LPA area, with some located in the Rhondda Cynon Taf LPA area. They are located between the M4 corridor and the former Aberthaw Coal Power Station on the southern coastline, a linear distance of c.13 miles. There have been organised into ten 'areas', totalling c. 526.ha of land.

These are shown on the location plan below:



DESCRIPTION OF DEVELOPMENT

The proposal is to construct and operate solar farms and battery storage development with a generation and export capacity of up to 249MW. The development includes associated works and apparatus such as battery storage units, solar panels and mounting structures, transformers, inverters, cabling, switchgear, containerised control rooms, substations and control rooms.

There are 9 'areas' shown for solar farms and one 'area' for battery storage. The battery storage is located nearest to the Aberthaw Power Station, where the developer intends to make use of a grid connection opportunity.

The scheme is a "Development of National Significance" (DNS) and therefore any planning application will be decided by the Welsh Ministers rather than the Local Planning Authority (LPA).

The applicant has requested a scoping direction from PEDW, who have asked for advice from the LPA insofar as it relates to their functions. A scoping direction request report has been submitted to accompany that request.

Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations Act (Wales) 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet its sustainable development (or wellbeing) objectives. This report has been prepared in consideration of the Council's duty and the "sustainable development principle", as set out in the 2015 Act. In reaching the recommendation set out below, the Council has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

REPORT

In reaching a scoping opinion, the decision maker must have regard to the matters listed in Paragraph 14 (6) of the Regulations (The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017) and before adopting a scoping opinion, the decision maker must take into account:

- (a) Any information provided by the applicant about the proposed development;
- (b) The specific characteristics of the particular development;
- (c) The specific characteristics of development of the type concerned; and
- (d) The environmental features likely to be significantly affected by the development.

A report has been submitted by the applicant to accompany their scoping list setting out how the Environmental Statement (ES) would be presented. The proposed topic chapters proposed for the ES are contained therein, as well as a list and discussion of topic areas to be 'scoped out'.

The following comments are provided by the LPA on the basis that the information in the scoping report is an accurate and comprehensive representation of all relevant development constraints that may impact on the development.

Ecology and Nature Conservation:

The Environmental Statement (ES) should include a description of all existing natural resources and biodiversity interests in and near to the application site areas and cable routes, together with a detailed assessment of the likely impact of the development on these interests. These are provided in outline within the scoping report, which identifies that the development could impact upon a wide variety of species and habitats, including up to 12 Sites of Local Importance for Nature Conservation (SINC), and other NRW Priority Areas. There are also areas of ancient woodland on or near of several of the site areas, and the Cors Aberthin SSSI is adjacent to PV Area 3.

The ES should also describe how avoidance measures have been implemented through the site selection and design process and demonstrate compliance with the stepwise approach advocated by Planning Policy Wales. It should also describe measures of biodiversity enhancement. The scoping report sets out the scope of surveys, and it is advised that pre-application advice is sought from the LPA to agree on the detailed scope of these surveys in consultation with the County Ecologist (as well as NRW).

Arable field margins areas can be Section 7 habitat (Natural Environment and Rural Communities Act 2006) and within APA's this is especially pertinent. Information can be downloaded at <https://www.biodiversitywales.org.uk/Enclosed-Farmland> - these habitats may require further consideration in the ES. Further survey work will be required (at the appropriate time of year) for arable plant (botanical survey), bats, and trees, reptiles/amphibians, water vole, otter, badger, brown hares and breeding birds. The preliminary ecological appraisal should be furnished with the invertebrate data (supplied by SEWBRc), especially the Section 7 species, and the further survey data.

The development could potentially also have significant impact on breeding birds, in particular, and it is agreed all ecological matters should be scoped into the ES, as well as considered cumulatively with other proposed developments (primarily solar) that could affect any important habitats on the site habitat. The same approach should be taken with any species or habitat for which a detrimental impact is identified (post mitigation).

Landscape and Visual Impact:

The LPA note that a Landscape and Visual Impact Assessment would be provided and form a topic area for the ES and agrees in principle with this approach. This should focus on the effects of the proposal on Special Landscape Areas, the Llancarfan Landscape of Outstanding Historic Interest and consider the cumulative impact together with existing and consented solar development where they can potentially be seen together in the landscape.

The LPA would strongly encourage the developer to engage to obtain pre-application advice and further discussion regarding the detailed scope of the LVIA, to ensure that the scope of assessment is sufficient and an appropriate set of viewpoints has been established, and assessed. The ES should describe the landscape features and designations of value, together with an assessment of the magnitude of the landscape impacts, based on the findings of the LVIA.

Historic Environment:

The scoping report identifies that the site boundaries interact with Grade II* and II Registered Parks and Gardens at Talygarn and Hensol, respectively. It will also likely affect the Llancarfan Registered Landscape of Outstanding Historic Interest, the Llancadle Conservation Area and a Scheduled Monument at Llanquian Wood Camp (GM182). There are another seven Registered Parks and Gardens, 47 Scheduled Monuments, 298 Listed Buildings, 18 Conservation Areas and two Registered Battlefields within a 3km radius.

There is limited information to ascertain the extent of the effects on these assets and the scope for avoidance or mitigation measures to be incorporated. There is clear potential for significant effects to occur both from the development of individual areas, as well as cumulatively, and the LPA agree that the impact to the historic environment should be scoped into the ES. It is advised that pre-application advice is sought from the LPA (as well as Cadw and Heneb) to inform the scope of these surveys, with reference to the impact to the settings of listed buildings and conservation areas.

Climate Change:

The impact of development on this scale upon climate change has the potential to be significant and the LPA would agree this topic should be scoped in. The approach set out is agreed, albeit the rationale for scoping out effects from the decommissioning phase (i.e. duration of operations, disposal/recycling etc.) is not fully set out.

Hydrology, Hydrogeology and Drainage:

The application areas include areas known to be at the highest risk of fluvial flooding (Flood Zone C2/ FMfP Zone 3) and the LPA would broadly agree the topic should be scoped in. The sensitivity of the development to flooding, risks, and degree of off-site impacts arising from development in the floodplain should all be described in the ES, together with any proposed flood mitigation measures to be deployed.

Noise and Vibration:

The proposed battery storage development has the potential to have significant effects on amenity and it is agreed that this should be scoped into the ES. The broad approach set out in the scoping report is agreed by the LPA, albeit it should be made clear that any plant associated with the photovoltaic areas is also distant enough from sensitive receptors as to have no significant impacts.

Cumulative Impacts:

It is agreed that the assessment of the effects should focus on the cumulative impact with other solar farms within the area (particularly on the cumulative landscape effects) as noted within the scoping report. The LPA would agree that the cumulative impact of proposals within any concurrent DNS applications for solar development should also be considered.

Topics scoped out:

The applicant proposed to scope out the following topics:-

Planning policy context

The LPA would agree with this approach.

Population and Human Health

There is no discussion of the economic impact from loss of agricultural (inc. arable) land (in relation to employment etc.), albeit significant effects on this basis alone are considered unlikely by the LPA.

The LPA would recommend that these impacts are discussed where relevant in the other ES chapters proposed (for example, human health in respect of noise and vibration).

Transport

The LPA would agree that the operational phase can be scoped out because of the limited traffic associated with such developments.

The scoping report acknowledges that there would be temporary effects during the construction phase (over a period of some 2 years) that would be assessed as part of a Transport Statement and require mitigation via a CEMP. It is acknowledged that the main arterial routes to the sites can accommodate HGV traffic, however, there is very little information provided regarding access to the individual field parcels.

The access would be via various parts of the network of country lanes within the Vale of Glamorgan, which often have limited width and few passing opportunities for HGV's. The LPA would point out that occasional use of these lanes by large vehicles is no evidence of their suitability to accommodate HGV traffic from an intense and sustained construction period. It is not known whether the routes have sufficient passing opportunities, whether new ones would be required, and further survey work such as swept path analysis or video surveys may be necessary to investigate this impact.

The impact from the decommissioning phase should also be considered.

The LPA do not agree that transportation should be scoped out of the ES at this stage.

Land

The sites cross several areas of Category 1 and 2 Limestone, Sand and Gravel, and Sandstone mineral resources, which indicate they contain reserves of national importance. The risk of the sterilisation of safeguarded mineral reserves is described in the scoping report.

It is identified that there are requirements under Planning Policy Wales (reflected in Local Plan policies) to demonstrate that the location and quality of the mineral is known and that the environmental constraints associated with extraction, including the potential for prior extraction, have been adequately considered. It is stated that this will be demonstrated in the Minerals Resource Assessment that will be prepared and included as an Appendix to the ES.

The proposed uses are not sensitive uses but would constrain mineral development on the site areas for the duration of the project until decommissioning. It is agreed that the development of the solar sites would not fetter mineral extraction beyond their lifetime, subject to site restoration.

The Regional Technical Statement (2nd Review) identifies that the Vale of Glamorgan has a sufficient 25-year mineral landbank available from existing sites (as of 2020). However, there are shortfalls in other areas in the region.

[https://www.valeofglamorgan.gov.uk/Documents/ Committee%20Reports/Cabinet /2020/20-12-07/Regional-Technical-Statement-on-Aggregates.pdf](https://www.valeofglamorgan.gov.uk/Documents/Committee%20Reports/Cabinet/2020/20-12-07/Regional-Technical-Statement-on-Aggregates.pdf)

It is not clear whether the battery storage site would be temporary, it being distinct from the solar areas and likely involving a much greater degree of development with permanent characteristics, such as enclosures/structures, expansive hardstanding areas and high voltage cables etc. This could potentially impact on soil quality beyond the life of the solar farm development (if temporary). This part of the site includes Category 2 safeguarded mineral resources (limestone).

The scoping report states that Agricultural Land Classification (ALC) studies are on-going. The application areas contain substantial areas of land predicted to be within the 'best and most versatile' classification of Grade 3A and above. The battery storage site contains areas predicted to be Grade 1, as do parts of the solar site areas. As noted, there is potential for significant ground disturbance to occur as part of the battery storage development, as well as a more temporary (but minimum 40 year) impact elsewhere. The solar development would also possibly inhibit productive agricultural use of the best arable land (crops etc.) for the duration of the development, and possibly longer.

Having regard to the scale of development and limited information available, **the LPA do not agree that land take should be scoped out of the ES at this stage.**

Ground Conditions / Soils

The scoping report is accompanied by information pertaining to ground conditions at each site area, describes potential impacts, and provides a set of outline avoidance mitigation measures pertaining to contamination and the potential creation of new pathways for contaminants. The sites are not known to be contaminated, however the potential for this cannot be ruled out and there may be risks to human health and the environment from unrecorded/ localised contamination. However, it is agreed the impacts of the development in this regard are unlikely to be significant and could be mitigated through adoption of best practice methods.

Air Quality

It is agreed that the main effects are likely to be during construction. The site is not within an Air Quality Management Area and it is agreed the effects of the development are likely to be localised, not cumulatively significant, and could also be mitigated.

Material Assets

The LPA would agree with the approach set out in the scoping report.

Risk of Major Accidents

There is little information provided about the size/ capacity of the battery storage systems and standing advice from the South Wales Fire and Rescue Service for such developments states:

Fires involving the installations... [Large Commercial Solar Arrays, Battery Energy storage Facilities] can be very difficult to extinguish. Conditions can cause a thermal runaway within battery cells, which is a highly exothermic reaction creating toxic, flammable, and/or explosive chemical atmospheres.

The scoping report does not acknowledge these specific risks but states a Battery Safety Management Plan would be produced. There are no details of the safety measures it might contain.

In view of the scale of the proposals and the degree of risk, coupled with the limited information available about design and mitigation measures, **the LPA do not agree that Risk of Major Accidents should be scoped out of the ES at this stage.**

Arboriculture

The scoping report suggests that the arboricultural impact can be mitigated through avoidance measures such as the creation of buffer zones to hedgerows and mature trees, while providing for enhancement through the provision of new landscaping and planting.

The LPA would agree that arboriculture can be scoped out as a specific topic, albeit the impact to green infrastructure, and how the stepwise approach has been adopted, should be clearly described in the application. This should include any areas lost to highway access provision and cable routes. This impact should be established to inform the ES and the impact of the development on ecology, biodiversity, and habitats.

Glint and Glare:

The LPA would agree that the glint and glare assessment should be carried out and consider the impact on residential amenity. Nonetheless, this impact is likely to be localised, and it is agreed this topic should be scoped out of the ES. The site is relatively close proximity to Cardiff Airport; however we would refer to the advice of the airport and the relevant safeguarding authorities in regard to this matter.

RECOMMENDATION

The LPA would advise the Planning Inspectorate that the Environmental Statement submitted should address the matters set out in the attached Officer's Report.

OBJECTION(S)

1. That the LPA would advise the Planning Inspectorate that the Environmental Statement submitted should address the matters set out in the attached Officer's Report.

NOTE:

Please note that this consent is specific to the plans and particulars approved as part of the application. Any departure from the approved plans will constitute unauthorised development and may be liable to enforcement action. You (or any subsequent developer) should advise the Council of any actual or proposed variations from the approved plans immediately so that you can be advised how to best resolve the matter.

In addition, any conditions that the Council has imposed on this consent will be listed above and should be read carefully. It is your (or any subsequent developers) responsibility to ensure that the terms of all conditions are met in full at the appropriate time (as outlined in the specific condition).

The commencement of development without firstly meeting in full the terms of any conditions that require the submission of details prior to the commencement of development will constitute unauthorised development. This will necessitate the submission of a further application to retain the unauthorised development and may render you liable to formal enforcement action.

Failure on the part of the developer to observe the requirements of any other conditions could result in the Council pursuing formal enforcement action in the form of a Breach of Condition Notice.

From: [Pickering, Steven P](#)
To: [Green, Jonathan H](#)
Subject: solar farm
Date: 11 February 2025 08:59:23

Hi Jon,

Few other thoughts on solar farm that should be taken into consideration -

Solar panel farms can have several negative impacts on biodiversity, particularly when they are developed in areas with rich ecosystems or fragile wildlife populations. Some of the key concerns include:

1. **Habitat loss and fragmentation:** Large solar farms require significant amounts of land, which can lead to the destruction or fragmentation of natural habitats. This may displace local wildlife and plant species, especially if the land is home to rare or endangered species. The alteration of landscapes can disrupt migration patterns and breeding areas.
2. **Disruption of local ecosystems:** The construction of solar farms can change the structure of local ecosystems. This can affect food sources, pollination networks, and the availability of shelter for various species. In some cases, invasive plant species may also be introduced unintentionally during development, further disrupting native ecosystems.
3. **Soil degradation:** The land preparation for solar farms—such as clearing vegetation, compacting soil, and altering drainage patterns—can degrade soil quality, making it less suitable for native plant species and reducing the availability of food for herbivores.
4. **Effects on pollinators:** In some cases, the removal of plant life and vegetation to make way for solar farms can reduce food sources and habitats for pollinators, such as bees and butterflies. This can disrupt local ecosystems and have cascading effects on plant reproduction and biodiversity.
5. **Disturbance during construction and maintenance:** The noise, vibration, and human activity associated with the construction and maintenance of solar farms can disturb wildlife, especially in sensitive areas. It can cause animals to abandon their habitats or migrate elsewhere, potentially leading to stress or disruption of natural behaviours.
6. **Edge effects:** When solar farms are built on the edges of woodlands or other natural areas, the "edge effect" can occur, where the environment at the boundary of the solar farm is altered in ways that make it less hospitable for certain species.

Changes in temperature, light, and humidity can create a harsh environment for species that prefer interior habitats.

To mitigate these impacts, it's important to consider the location of solar farm developments carefully, with efforts made to protect existing biodiversity. Implementing measures like planting native vegetation, creating wildlife corridors, and ensuring proper land management can help reduce some of the negative effects on biodiversity.

Colin has probably already raised these points.

Hope this helps.

Stephen Pickering
Team Leader, Countryside Services / Arweinydd Tîm, Gwasanaeth Gwledig
Sustainable Development / Gynllunydd Ceisiadau
Directorate of Place / Adfywio a Chynllunio
Vale of Glamorgan Council / Cyngor Bro Morgannwg

tel / ffôn: [REDACTED]
mob / sym: [REDACTED]
e-mail / e-bost [REDACTED]

*Consider the environment. Please don't print this e-mail unless you really need to.
Ystyriwch yr amgylchedd. Peidiwch ag argraffu'r neges hon oni bai fod gwir angen.*

Visit our Website at www.valeofglamorgan.gov.uk
Ewch i'n gwefan yn www.bromorgannwg.gov.uk

[Find us on Facebook / Cewch ddod o hyd i ni ar Facebook](#)
[Follow us on Twitter / Dilynwch ni ar Twitter](#)

Correspondence is welcomed in Welsh or English / Croesewir Gohebiaeth yn y Gymraeg neu yn Saesneg.

From: [Shaw, Emily](#)
To: [Green, Jonathan H](#)
Subject: Solar Farm response
Date: 04 February 2025 16:19:55

Hi Jon,

A solar farm like this on such a large scale will hinder future landscape connectivity projects, Nature Recovery Action Plan targets, and efforts to achieve the Vale's 30x30 goals (protect and conserve 30% of land for nature by 2030). Additionally will these solar farms be temporary? Will it mean that future housing developments be confined to smaller areas if land is being taken up for solar farms.

Some info online on how solar farms can affect biodiversity- in case that helps with your response:

Solar panel farms can have several negative impacts on biodiversity, particularly when they are developed in areas with rich ecosystems or fragile wildlife populations. Some of the key concerns include:

1. ***Habitat loss and fragmentation*:** Large solar farms require significant amounts of land, which can lead to the destruction or fragmentation of natural habitats. This may displace local wildlife and plant species, especially if the land is home to rare or endangered species. The alteration of landscapes can disrupt migration patterns and breeding areas.
2. ***Disruption of local ecosystems*:** The construction of solar farms can change the structure of local ecosystems. This can affect food sources, pollination networks, and the availability of shelter for various species. In some cases, invasive plant species may also be introduced unintentionally during development, further disrupting native ecosystems.
3. ***Soil degradation*:** The land preparation for solar farms—such as clearing vegetation, compacting soil, and altering drainage patterns—can degrade soil quality, making it less suitable for native plant species and reducing the availability of food for herbivores.
4. ***Effects on pollinators*:** In some cases, the removal of plant life and vegetation to make way for solar farms can reduce food sources and habitats for pollinators, such as bees and butterflies. This can disrupt local ecosystems and have cascading effects on plant reproduction and biodiversity.
5. ***Disturbance during construction and maintenance*:** The noise, vibration, and human activity associated with the construction and maintenance of solar farms can disturb wildlife, especially in sensitive areas. It can cause animals to abandon their habitats or migrate elsewhere, potentially leading to stress or disruption of natural behaviours.
6. ***Edge effects*:** When solar farms are built on the edges of forests or other natural areas, the "edge effect" can occur, where the environment at the boundary of the solar farm is altered in ways that make it less hospitable for certain species. Changes in temperature,

light, and humidity can create a harsh environment for species that prefer interior habitats.

Visual and Landscape Impact

- Solar farms can alter scenic landscapes, particularly in rural or protected areas, affecting the character of historically or ecologically significant sites.
- This may pose challenges for future landscape conservation projects that aim to preserve natural beauty and heritage.

Heat Island Effect

- Large solar farms can create localized increases in temperature, potentially affecting nearby vegetation and altering local microclimates.

Reduced Land Availability for Conservation and Agriculture

- Large solar farms may take up land that could otherwise be used for habitat restoration, rewilding, or agricultural practices that support biodiversity.
- This could lead to conflicts between renewable energy goals and conservation efforts.

Mitigation Strategies

To minimize these negative effects, solar farms can be designed with biodiversity in mind:

- **Integrating wildflower meadows** and pollinator-friendly plants between panels.
- **Maintaining hedgerows and corridors** to allow wildlife movement.
- **Dual land use approaches**, such as agrovoltatics (combining solar panels with grazing or crops).
- **Avoiding ecologically sensitive sites**, such as wetlands or priority habitats.

Let me know if you need more info.

Many thanks,

Emily

Emily Shaw

Local Nature Partnership Co-ordinator/ Cydlynnydd Partneriaeth Natur Leol

Vale of Glamorgan LNP/ PNL Bro Morgannwg

e-mail / e-bost: [REDACTED]

My usual working days are Monday-Friday.



Visit our webpage at <https://www.biodiversitywales.org.uk/Vale-of-Glamorgan>

Ewch i'n gwefan yn <https://www.biodiversitywales.org.uk/Bro-Morgannwg>

Correspondence is welcomed in Welsh or English / Croesewir Gohebiaeth yn y Gymraeg neu yn Saesneg.

From: [Green, Jonathan H](#)
To: [Rowlands, Ceiri](#)
Subject: RE: Planning Application Consultation 2024/01219/OBS Approximately 9 sites between Junction 34 of the M4 and St Athan in the Vale of Glamorgan. (DNS CAS-03721-J2H3Y3 - Afon Ddaw Solar and Energy Storage Project)
Date: 13 February 2025 14:22:18
Attachments: [image001.png](#)

Hi Ceiri

Just an additional point on the GI strategy

The 'Rivers Thaw and Waycock & Tributaries Corridor' is identified as a strategic GI corridor in the strategy

Cheers

Jon

Jonathan Green
Principal Landscape Architect /Prif Bensaer Tirlunio
Sustainable Development / Gynllunydd Ceisiadau
Directorate of Place / Adfywio a Chynllunio
Vale of Glamorgan Council / Cyngor Bro Morgannwg
mob / sym: [REDACTED]
e-mail / e-bost: [REDACTED]

*Consider the environment. Please don't print this e-mail unless you really need to.
Ystyriwch yr amgylchedd. Peidiwch ag argraffu'r neges hon oni bai fod gwir angen.*

Visit our Website at www.valeofglamorgan.gov.uk
Ewch i'n gwefan yn www.bromorgannwg.gov.uk

[Find us on Facebook / Cewch ddod o hyd i ni ar Facebook](#)
[Follow us on Twitter / Dilynwch ni ar Twitter](#)

Correspondence is welcomed in Welsh or English / Croesewir Gohebiaeth yn y Gymraeg neu yn Saesneg.

From: Green, Jonathan H
Sent: 13 February 2025 13:03
To: Rowlands, Ceiri <[REDACTED]@[REDACTED].uk>
Subject: RE: Planning Application Consultation 2024/01219/OBS Approximately 9 sites between Junction 34 of the M4 and St Athan in the Vale of Glamorgan. (DNS CAS-03721-J2H3Y3 - Afon Ddaw Solar and Energy Storage Project)

Hi Ceiri

Just a couple of other observations

Appendix 6.2: Assessment methodology paras 1.20 and 1.21 not sure I agree with classing moderate effects as not significant. Some of these landscapes are not designated but have a significant strong rural character which the scale of the proposed development could significantly alter therefore a moderate change to the perception of that landscape by people passing through it would have some significance.

Proposed deer fencing should consider wildlife foraging routes and make provision to retain

access for foraging animals through the fence lines

I have issue with 'temporary' nature of proposed development... once the infrastructure is in it does not make sense to dismantle it all and start again somewhere else. If solar is still part of the energy mix they will just seek to renew... Appreciate its reversible but....

Topics scoped out of the ES

Health – whilst the direct human health effects are limited there is the potential for mental health impacts on those that experience the landscape. Where visible the perception of the angular built forms of the solar panels is at odds with the natural forms of the landscape and reduces the sense of calm invoked in the natural environment. I've not explained that well but there is growing evidence of the impact of urban environments on mental wellbeing.

Transport - Recreational cycling through this area is extensive, have they considered the impact of the development on this aspect? Some formal routes but most just use the quiet lanes to get out into the countryside...

Soil - The team mentioned the possibility of peat soils in the area, though they weren't sure of the extent of recent discoveries of peat, so may not be relevant

Arboriculture - Stated they will do a BS5837 survey and AIA in support of the application this should also include a schedule of maintenance operations to retained trees if appropriate and an Arboricultural Method Statement (AMS) to show how trees will be protected during the construction phases

Connectivity of existing arboricultural features in the landscape should be referenced and measures included in the AIA to enhance connectivity

6.3 Baseline information and study area – should reference the Restore the Thaw landscape project ongoing in the area and they will need to engage with the Restore the Thaw project team to understand any ongoing projects that might be impacted by the development or might restrict the development within the river thaw catchment area.

7.2 Legislative, policy context and guidance – VoG Green infrastructure strategy – not adopted but draft and reference significant landscape connectivity corridors within the Vale so should be referenced in the context of such a landscape wide development. Maybe not in this section but should be referenced.

7.3 Base line - tree canopy cover data - outcome of project should be to increase tree canopy cover in the area, maybe at odds with solar but an assessment should be made as this development sterilises opportunity to offset agricultural land for increasing canopy cover and carbon offset through tree planting

Cheers

Jon

Jonathan Green
Principal Landscape Architect / Prif Bensaer Tirlunio
Sustainable Development / Gynllunydd Ceisiadau
Directorate of Place / Adfywio a Chynllunio

Vale of Glamorgan Council / Cyngor Bro Morgannwg
mob / sym: [REDACTED]
e-mail / e-bost: [REDACTED]

*Consider the environment. Please don't print this e-mail unless you really need to.
Ystyriwch yr amgylchedd. Peidiwch ag argraffu'r neges hon oni bai fod gwir angen.*

Visit our Website at www.valeofglamorgan.gov.uk
Ewch i'n gwefan yn www.bromorgannwg.gov.uk

[Find us on Facebook / Cewch ddod o hyd i ni ar Facebook](#)
[Follow us on Twitter / Dilynwch ni ar Twitter](#)

Correspondence is welcomed in Welsh or English / Croesewir Gohebiaeth yn y Gymraeg neu yn Saesneg.

From: Green, Jonathan H

Sent: 12 February 2025 18:28

To: Rowlands, Ceiri <[REDACTED]>

Subject: RE: Planning Application Consultation 2024/01219/OBS Approximately 9 sites between Junction 34 of the M4 and St Athan in the Vale of Glamorgan. (DNS CAS-03721-J2H3Y3 - Afon Ddaw Solar and Energy Storage Project)

Sorry Ceiri

Been flat out today and the time slots between meetings vanished into thin air....

Agree with the thought about existing as part of the baseline and they should be considered as part of the cumulative effect, especially as the implications for the wider valley landscape could be significant. I'll pull together the rest of the comments 1st thing in the morning.

One point I noted was the reference to 5km ZTV for solar and 3km ZTV for BESS but only 3km shown on any of the ZTV's included with the preliminary assessment so may be worth emphasising this point as there appeared to be visibility from outside the 3k limit shown. Like the 1.7m viewer height referenced for the views, remains to be seen if they do this with the actual visualisations.....

Attached the responses I've had for reference but will summarise tomorrow with the notes I took at our meeting.

Cneers

Jon

Jonathan Green
Principal Landscape Architect /Prif Bensaer Tirlunio
Sustainable Development / Gynllunydd Ceisiadau
Directorate of Place / Adfywio a Chynllunio
Vale of Glamorgan Council / Cyngor Bro Morgannwg
mob / sym: [REDACTED]
[REDACTED]

*Consider the environment. Please don't print this e-mail unless you really need to.
Ystyriwch yr amgylchedd. Peidiwch ag argraffu'r neges hon oni bai fod gwir angen.*

From: [Rowlands, Ceiri](#)
To: [PEDW – Seilwaith / Infrastructure](#)
Subject: RE: EIA Scoping Consultation - DNS CAS-03721-J2H3Y3 - Afon Ddaw Solar and Energy Storage Project
Date: 27 February 2025 12:36:20
Attachments: [image001.jpg](#)
[image003.jpg](#)
[image004.jpg](#)

Hello,

Further to the below and, if possible, it would be worthwhile appending/ clarifying that while we consider the focus should be on solar in terms of cumulative schemes in terms of landscape impacts, we'd recommend other relevant battery storage schemes are also considered. The reason, specifically, I write now is that we have been notified that another battery storage proposal close to Aberthaw (proposing to utilise the same connection point) is out to pre-application consultation at the moment.

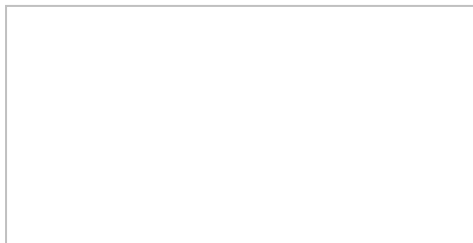
<https://castleroadbatterystorage.co.uk/documents/>

(subject of screening opinion 2023/01067/SC1 with the LPA).

If it is too late, I will contact the applicant directly.

Regards,

Ceiri



Date Dyddiad 7th January 2025
Email Ebost
[REDACTED]
Contact Cyswllt Alexandra Richards
Our ref Ein cyf 25/00039/RFO



Neuadd y Sir
Caerdydd,
CF10 4UW
Ffôn: (029) 2087 2088
www.caerdydd.gov.uk
County Hall
Cardiff,
CF10 4UW
Tel: (029) 2087 2087
www.cardiff.gov.uk

Ms Tanya Leck
PEDW
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

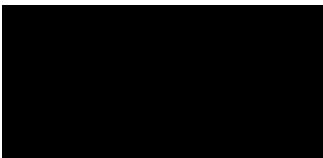
Dear Sir/Madam,

Location: Approximately 9 Sites Between Junction 34 Of The M4 And St Athan In The Vale Of Glamorgan

**Proposal: Scoping Direction for Afon Ddaw Solar and Energy Storage Project
DNS CAS-03721-J2H3Y3**

This application has now been considered and this authority has no comment to make in respect of this Scoping Direction.

Yours faithfully



Head of Planning

Your Information Is Processed Under The Data Protection Act 2018 To Fulfil Cardiff Council's Legal And Regulatory Tasks As A Local Authority. For Further Information On What Personal Data We Hold And How Long We Keep It For, Please View Our Privacy Policy; www.cardiff.gov.uk/privacynotice If You Have Concerns About How Your Data Has Been Handled, Contact The Council's Data Protection Officer Via Dataprotection@cardiff.gov.uk .

GWEITHIO DROS GAERDYDD, GWEITHIO DROSOCH CHI

Mae'r Cyngor yn croesawu gohebiaeth yn Gymraeg, Saesneg neu'n ddwyieithog. Byddwn yn cyfathrebu â chi yn ôl eich dewis, dim ond i chi roi gwybod i ni pa un sydd well gennych. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

WORKING FOR CARDIFF, WORKING FOR YOU

The Council welcomes correspondence in Welsh, English or bilingually. We will ensure that we communicate with you in the language of your choice, as long as you let us know which you prefer. Corresponding in Welsh will not lead to delay.



**STRONGER
FAIRER
GREENER**





Materion Ffyniant a Datblygu/Prosperity and Development
Llawr 2/Floor 2, 2 Llys Cadwyn, Pontypridd, CF37 4TH
E-bost: gwasanaethaucynllunio@rctcbc.gov.uk
Email: planningsservices@rctcbc.gov.uk

Ms Tanya Leck,
Planning Officer
Planning and Environment Decisions Wales,
Crown Buildings,
Cathays Park,
CF10 3NQ.

PEDW.Infrastructure@gov.wales

Fy Nghyf/My Ref:
24/1284/SSO

Gofynnwch am-Please ask for:
Giles Howard 01443 281130

Dyddiad/Date:
27/01/2025

**DATBLYGIAD
ARFAETHEDIG/
PROPOSAL :**

Solar Farm with Battery Energy Storage System

**LLEOLIAD
/LOCATION:**

Approximately 9 Sites Between Junction 34 Of The M4 And St
Athan In The Vale Of Glamorgan

Dear Madam,

I refer to your correspondence dated 18th December 2024, concerning the above and your request for observations on the scope of the EIA associated with it.

Having corresponded with relevant internal consultees I can provide the following comments:

It is noted that all but a very small part of the proposed DNS would fall outside the administrative boundary of Rhondda Cynon Taf. However, the two sites which would appear to have the most immediate significance for biodiversity within RCT are PV9 and PV7.

The suite of proposed surveys for these sites appears to be generally acceptable, however there are some key issues or details that the Council would want to raise through this process.

The site identified as PV7, although not in RCT, is immediately adjacent to Site of Importance for Nature Conservation (SINC) 155 Rhydhalog. This SINC includes the northern part of Ystradowen Bog, a regionally important and extensive lowland degraded bog, which extends across a large adjacent part of the Vale of Glamorgan.

There is a high potential that some of the proposed solar farm development within the Vale on low-lying ground adjacent to the bog may affect degraded peat bog habitat. As per the requirements of PPW12 regarding peatland assessment and consideration, an assessment of peat impact is suggested for PV7, as well as peat and hydrological impacts on the adjacent peatland habitat of Ystradowen Bog.

Site PV9, at Llanharry, is described as impacting on cattle/sheep grazed pasture/pasture. Experience has shown that in an RCT context, short grazed permanent pasture has the potential to support diverse grassland fungi assemblages of ecological significance, with eDNA fungi survey work proving an effective baseline grassland fungi assessment method.

It is therefore strongly recommended that eDNA grassland fungi survey assessment is included as part of the ecological assessment of DV9.

The provision of ecological mitigation and enhancement should reflect the nature conservation impacts and local biodiversity context. Consequently, species rich grass mixes and complex tree planting should be avoided, and in their place mitigation/enhancement would be best provided by better management of existing grassland habitats.

This could be achieved, for example, via conservation grazing or cut and collect hay management and hedgerows, and where appropriate natural tree/scrub regeneration would be preferred. The setting aside of dedicated areas of habitat of a size and potential to be effectively managed as grassland, hedgerow or woodland mitigation would be strongly recommended.

The Council would appreciate the opportunity to review ecology work provided for PV7 and PV9 at an early stage, to comment on recommendations for further work, and comment on the design and development of effective, and context sensitive ecological mitigation and enhancement.

With regard to the potential for pollution, emissions from construction and decommissioning plant and vehicles would be expected, together with the creation of dust. The operation of the development would likely cause no emissions.

With the exception of the construction and decommissioning stages, it is noted that the only potential pollution or nuisance could be caused by the noise of cooling plant. In this regard an acoustic report could establish the existing noise baseline and, if required, identify any Mitigation measures identified.

The proposed solar farms would have a limited impact on the highway network within the Council's administrative area with only limited maintenance vehicular trips required after construction.

The details as set out in the ES Scoping report Chapter 4.2 Transport indicate that a Transport Assessment, covering the points listed below, would be provided as part of any future planning application.

- A Transport Statement (TS) and Transport Implementation Strategy (TIS) relating to construction, operation and dismantling phase should be submitted for consideration and approval.
- Details of the proposed access point off the adopted highway to include vision splays to accord with the 85th % tile speeds.
- Details of any proposed works to existing public highway to provide power supply / cable route along with legal agreement with the Highway Authority should the cable route be private and not in the ownership of a statutory undertaker.

The Highway Authority would require the developer to submit a Construction Traffic Management Plan (CTMP) for approval prior to any works commencing on site, which could be dealt with via conditions of any future consent.

Lastly, since the development would fall mostly outside Rhondda Cynon Taf its impact upon the wider landscape in RCT would be limited and considered insignificant. However, sites PV7, PV8 and PV9 are outside of the settlement boundary and within close proximity of Llanharry, Talygarn and both the designated Conservation Area and Historic Garden associated with the latter.

Therefore, given the environmental sensitivity of the surrounding area it would be expected that any ES should demonstrate how those sites would affect overall massing in the immediate landscape and be viewed in the context of the open countryside, nearest developments and aforementioned heritage assets.

Yr eiddoch yn gywir / Yours faithfully,

Giles Howard
Team Leader – Development Management

Ein cyf/Our ref: CAS-271064-B5C2
Eich cyf/Your ref: DNS CAS-03721-
J2H3Y3

Planning & Environment Decisions Wales
Crown Building
Cathays Park
Cardiff
CF10 3NQ

Dyddiad/Date: 14 February 2025

Annwyl Syr/Madam/Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

**THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES)
ORDER 2016 TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT
ASSESSMENT) (WALES) REGULATIONS 2017**

BWRIAD/PROPOSAL: SOLAR FARM WITH BATTERY ENERGY STORAGE SYSTEM.

**LLEOLIAD/LOCATION: APPROXIMATELY 9 SITES BETWEEN JUNCTION 34 OF THE
M4 AND ST ATHAN IN THE VALE OF GLAMORGAN.**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 18 February 2025.

We have reviewed the submitted 'Afon Ddaw Solar and Energy Storage Project – Request for Scoping Direction' prepared by RPS Group, dated December 2024. We are commenting because we consider the proposals are likely to give rise to significant effects. We advise the following likely significant effects are assessed by the applicant and consider they should be 'scoped in' to any future Environmental Statement (ES).

Based on the information submitted we provide the following advice in relation to Protected species, Protected Sites, and controlled waters, water quality, flood risk, land contamination and waste management.

1.0 General

In general the ES for this development should include sufficient information to enable the determining body to determine the extent of any environmental impacts arising from the proposed scheme including any legally protected species, and those which may also comprise notified features of designated sites affected by the proposals.

Evaluation of the impacts of the scheme should include: direct and indirect; cumulative; short, medium and long term; permanent and temporary; positive and negative; construction, operation and decommissioning phases and impacts on long-term site security of the nature conservation resource.

Description of the Project

Within the ES, the proposed scheme should be described in detail in its entirety. This description should cover construction, operation and decommissioning phases as appropriate and include detailed, scaled maps and drawings.

We would expect the description to include:

- The purpose and physical characteristics of the proposal
- Location, development size and configuration of the development including flexibility of the site layout
- Procedures for good working practices
- Identification of appropriate pollution contingency and emergency measures for watercourses on site
- Timing of all works and contingency plans should slippage in the programme occur
- Maintenance requirements of structures
- Arrangements for maintenance and management of any habitats within the site
- Artificial lighting requirements, including likely intensity and location of light spill on green infrastructure.

Illustrations within the Environmental Statement

Any maps, drawings and illustrations that are produced to describe the project should be designed in such a way that they can be overlaid with drawings and illustrations produced for other sections of the ES such as biodiversity.

Description of Biodiversity

The ES must include a description of all the existing natural resources and wildlife interests within and in the vicinity of the proposed development, together with a detailed assessment of the likely impacts and significance of those impacts.

Key Habitats

Any habitat surveys should accord with the JNCC Phase 1 survey guidelines (JNCC (2010) Handbook for Phase 1 habitat survey). We advise that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present.

2.0 Landscape and Visual Amenity

We welcome that further a Landscape and visual Impact (LVIA) is to be carried out. We consider impacts from this solar farm to be of a local interest, therefore we would defer to the Local Planning Authority for comment on this matter.

3.0 Ecology and Biodiversity

3.1 Protected Species

We advise that the site, and where necessary land adjacent to the site, is subject to assessment to determine the likelihood of protected species being present and affected by

the proposals. Targeted species surveys should be undertaken for all species scoped in which:

- i. are undertaken by qualified, experienced and where necessary, licensed ecologist(s) and,
- ii. comply with current best practice guidelines. In the event that the surveys deviate from published guidance, or there are good reasons for deviation, full justification for this should be included within the ES.

We welcome the proposals to undertake survey for protected species, including bats, great crested newts (GCN), dormouse, otter and water vole. Whilst it is not clear if the decision on which surveys to scope in has been finalised, we note the lists of proposed species surveys for each development location detailed in Table 7.1. We advise against using desk study results alone to scope out certain species or surveys at a development location; absence of a protected species records in an area can be due to no surveys having been carried out in that area, and would not necessarily imply absence of the species.

We advise that, at every development location (including the PV areas, BESS and Cable route), alongside a desk study the extended Phase 1 habitat surveys are used to identify the habitats present on site, or in proximity to the site, and the habitats present assessed for their suitability to support protected species. Where a species survey is scoped out at a location we advise a full and clear justification is included in the ES.

Bats

We welcome that further surveys for roosting, commuting and foraging bats are proposed including tree roost survey, transect/activity surveys and emergence surveys. We advise that trees identified to be of moderate or higher potential for bats which are likely to be impacted by the scheme (directly or indirectly) are subject to climbed, endoscope inspections of potential roost features present.

GCN

We advise that surveys for GCN cover all waterbodies within 250m of each development location. Note that in general, we advise against using habitat suitability index (HSI) assessment to determine whether to undertake presence/absence survey. We advise a suite of traditional surveys should be undertaken, following published best practice guidance, where eDNA survey results indicate presence of the species, or are inconclusive. We advise GCN surveys are undertaken as early in the survey period as possible to maximise chance of visiting waterbodies whilst they hold water.

Location of cable route

We note the route for the cable connection has not been determined at the time of the report. Whilst there does not appear to be reference to approximate length of cable route, the straight line distance from the northern most to southern most development location is circa. 13km. We advise the ES sets out a description of the intended works for the cable route and grid connection including, but not limited to; the route, working width and methods to install the required infrastructure.

We advise the stepwise approach is used in consideration of the route selection, and therefore advise that cabling route is positioned within highways and through existing hedgerow gaps as much as possible, to avoid impacts on habitats. If the route will go through third-party easements, we advise the scheme aims to minimise loss of connectivity of habitats, and minimise removal of habitats. Where hedgerow bisecting it is unavoidable we advise that the working corridor is minimised as much as possible and the hedgerow is

temporarily translocated and then reinstated into the gap post-works. Translocation of hedgerows has much better establishment success than newly planted hedgerows when undertaken properly. An area of land adjacent to the gap will need to be identified as a temporary receptor for the hedgerow.

Buffer Zones

We welcome reference to 'protection and buffering of retained habitats and designated sites' and that the extent of these would be informed by input from NRW. We advise buffers of 7m from break of bank slope to the perimeter fence for watercourses; and for hedgerows and woodlands, buffers of 5m from edge of the habitat to the perimeter fence, or to the solar panels where it is an internal hedgerow. Buffers of this scale reduce the potential impacts on protected species which may use watercourses such as otter or water vole, and on protected species that use the hedgerows and woodland such as dormouse.

Fencing

We note from the project description that grazing is likely beneath and around the solar panels. Grazing over the projected 40 year lifetime of the development could damage the structure and integrity of hedgerows and woodlands for protected species. We therefore advise that boundary and internal hedgerows and woodlands at the project locations should be fenced from grazing stock to avoid damage and achieve broad, dense, structurally diverse hedgerows.

Impact Assessment

Should protected species be confirmed, we advise that the report identifies species-specific impacts, for the species and its supporting habitats, in the short, medium and long term; together with any mitigation and compensation measures proposed to offset the impacts identified.

We advise comprehensive descriptions of the habitats affected are included to support robust conclusions about their significance for the species. The size (area or length) of any habitats to be impacted should be clearly set out, along with the location and extent/area of any mitigation or compensation areas.

We advise that the ES considers significance (both alone and in combination) and where applicable conservation status. In respect of conservation status, we advise consideration be given to the current conservation status of the relevant species. The ES must demonstrate that there will be no detriment to maintenance of favourable conservation status (FCS) of the species during construction, operation and where relevant decommissioning phases of the scheme.

We advise that the ES sets out how the long term site security of any mitigation or compensation will be assured, including management and monitoring information and long term financial and management responsibility. Where the potential for significant impacts on protected species is identified, we advocate that a Conservation Plan is prepared for the relevant species and included as an Annex to the EA.

Lighting

We advise that new and retained green infrastructure should remain unaffected by artificial lighting both during the construction and operational phases of the development. We advise that the ES includes an assessment of the impacts of any required lighting and, should it be required, measures to minimise impacts.

EPS Licence

Where a European Protected Species is identified and the development proposal will contravene the legal protection they are afforded, a licence should be sought from NRW. The ES must include consideration of the requirements for a licence and set out how the works will satisfy the three requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended). One of these requires that the development authorised will 'not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range'. These requirements are also translated into planning policy through Planning Policy Wales (PPW) December 2018, section 6.4.22 and 6.4.23 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The local planning authority will take them into account when considering the ES where a European Protected Species is present.

3.2 Biodiversity

Green infrastructure management

It is vital that the design of the development includes robust, well connected green infrastructure corridors. There are records of bats, dormice and great crested newts in this area of the Vale and these species are likely to be in the vicinity. We recommend that the scheme includes proposals for positive management and improvement of hedgerows and on-site woodland, for the benefit of dormouse, during the operational period. Restoration and creation of species rich hedgerows which are connected to wider habitat is encouraged. Additionally, restoration and creation of a series of ponds across the development locations, to restore and enhance the Vale's network of waterbodies for great crested newts, is advocated.

Local Biodiversity Interests

We recommend that the developer consults the local authority Ecologist on the scope of the work to ensure that regional and local biodiversity issues are adequately considered, particularly those habitats and species listed in the relevant Local Biodiversity Action Plan, and are that are considered important for the conservation of biological diversity in Wales. We would expect the developer to contact other relevant people/organisations for biological information/records relevant to the site and its surrounds. These include the relevant Local Records Centre and any local ecological interest groups (E.g. bat groups, mammal groups).

Securing Biodiversity Enhancement

We advise the English Biodiversity Net Gain metric is not used in Wales. Whilst some indications of potential enhancements have been set out above, proposals for biodiversity enhancement should be agreed with the local authorities Ecologist. We also advise that, in accordance with the Environment (Wales) Act 2016 and Planning Policy Wales, the application demonstrates how it can deliver biodiversity enhancements and thus contribute to promoting ecological resilience. This is reaffirmed in the [Welsh Government letter of 23/10/19 to all Chief Planning Officers – Securing Biodiversity Enhancements.](#)

3.3 Terrestrial Ornithology

Section 7.3.4 breeding and wintering bird surveys are being undertaken across all of the Areas. There is limited information relating to survey effort (e.g. number of hours per season of vantage point survey, or number of visits for other surveys).

We advise that the scope of the surveys should include consideration of breeding Wildlife and Countryside Act 1981, Schedule 1 species, Section 7 species (e.g. curlew) and bird features of any designated sites with functional linkage to the application site.

3.4 Designated sites

The proposals are significant in extent. It is noted that areas within the proposed red line boundary are in proximity to designated site(s), within NRW priority areas and areas of known biodiversity value. Cors Aberthin Site of Specific Scientific Interest (SSSI) lies adjacent to the eastern boundary of the Area 3. Every precaution should be taken to ensure that habitats are appropriately considered during the full Environmental Impact Assessment (EIA). We would recommend that all areas are subject to NVC/Phase 2 to fully understand the nature and value of existing habitats. We also acknowledge in section 7.4.28 the discussion around inclusion of designated site buffers.

We advise the applicant contact the Cardiff and Vale Environment team to discuss this at the earliest opportunity. Cardiff&Vale.EnvironmentTeam@cyfoethnaturiolcymru.gov.uk

Construction Environment Management Plan (CEMP)

We note and welcome the inclusion of a CEMP. We would expect the below points to be included within the document:

- Construction methods: details of materials, how waste generated will be managed;
- General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats protection, avoidance and mitigation measures.
- Soil Management: details of topsoil strip, storage and amelioration for re-use.
- CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.
- Control of Nuisances: details of restrictions to be applied during construction including timing, duration and frequency of works; details of measures to minimise noise and vibration from piling activities, for example acoustic barriers; details of dust control measures; measures to control light spill and the conservation of dark skies.
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use
- Traffic Management: details of site deliveries, plant on site, wheel wash facilities
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details
- Landscape/ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.

Waste Management

We recommend the Applicant, try to limit the generation of waste or the removal of waste off site. Through engineering and design, the Applicant should look to incorporate any excavations on site to reduce the need for disposal off site.

Waste produced during the construction phase of the development must be dealt with appropriately and be in line with all relevant waste legislation, including Duty of Care Regulations and Hazardous Waste Regulations. As part of the waste duty of care, the Applicant must classify the waste produced:

- before it is collected, disposed of or recovered;
- to identify the controls that apply to the movement of the waste;
- to complete waste documents and records;
- to identify suitably authorised waste management options;
- to prevent harm to people and the environment.

Any waste removed from site will be subject to waste management controls. Information on how to classify waste and register as a waste carrier or hazardous waste producer is available on our website.

Further information for the applicant

In the Eastern Vale, a water vole reintroduction project is currently ongoing, predominantly focussed along the Thaw catchment. This work has been undertaken by NRW/ WTSWW/ INCC and other partners. For more information regarding the release sites, please contact

4.0 Hydrology and Flood Risk

4.1 Groundwater protection

Our mapping system shows groundwater vulnerability across the site is medium-high. The underlying bedrock is defined as a principle aquifer. A Source Protection Zone (SPZ) is located within the part of the western area of the proposed development.

The proposed development will be spread over several non-contiguous parcels of land which cover in total a significant land mass, however, the nature of the in-combination operating infrastructure within these parcels of land is unknown. The ground conditions associated with each of the land parcels proposed for housing infrastructure is currently unknown. Ground conditions include ground materials and their characteristics, groundwater conditions including environmental quality, and baseline drainage characteristics. We do not agree with section 10.5 that contamination from the BESS and solar panel infrastructure should be scoped out.

Therefore we recommend the ES should consider:

- A detailed assessment of current baseline drainage characteristics for all of the land parcels earmarked for infrastructure development. This should include an understanding of water environment conditions including surface-water and groundwater conditions and linkages as these conditions, depending on the depth to groundwater and how groundwater and surface water are linked across the land parcels, may be affected by the operating infrastructure, notably buried cabling. It is noted that the proposed infrastructure will be operating over several decades and within, what will at times be, hostile climatic conditions associated with a changing climate (periods of extreme heat, rainfall, cold and wind). The potential for

infrastructure to degrade over the coming decades must be considered as part of operational risk assessment.

- BESS infrastructure must be designed with a sealed fire-fighting water containment system. BESS fires are characterised by high temperatures and therefore require a very significant volume of firewater to contain such fires. The firewater from a BESS fire will contain hazardous chemicals and such firewater cannot be allowed to infiltrate into the local water environment/groundwater as this would result in pollution. Local bedrock is designated as a Principal Aquifer and of Medium to High Vulnerability. There is also a designated area of SPZ1 which must be considered as an influencing factor for the siting and operation of infrastructure. [The Environment Agency's approach to groundwater protection](#) which has been adopted by Wales, should be consulted including 'Section C Infrastructure' as there are several principles that can be applied to all infrastructure.
- Production of a Water Framework Directive Assessment given the non-contiguous nature of the infrastructure, and the water-rich environment within which the infrastructure will be built and operate. It is important to consider potential interactions and effects on private water supplies, springs, streams and groundwater dependent terrestrial ecosystems. The WFD requires that the flow and water quality characteristics of water bodies are either maintained if good, or improved upon if poor. Poor status does not imply that the status of a water body can be worsened because of infrastructure.

4.2 Flood Risk

The planning application proposes less vulnerable development (solar farm and battery storage). Our Flood Risk Map confirms part of the site to be within Zone C2 of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning (FMfP) identifies the part of the site to be at risk of flooding and falls into Flood Zone 2 and 3 Rivers/ Sea.

We welcome the intention to undertake a FCA in section 10.5.2. The criteria for the FCA, which should normally be undertaken by a suitably qualified person carrying an appropriate professional indemnity, are given in Section 7 and Appendix 1 of TAN15. The FCA should be proportionate to the development proposed. You may also refer to our [website](#), which contains technical advice and recommendations.

Main Rivers

We note several main rivers run through the development sites, including the River Thaw, Nant Tregof and Newton Moors. In some instances, a flood risk activity permit (FRAP) may be required from us, for example to construct a structure on the bank of a main river. Any works affecting an ordinary watercourse may require an Ordinary Watercourse Consent from the relevant Lead Local Flood Authority.

4.3 Decommissioning

We advise the production of a Preliminary Decommissioning Assessment. We note that infrastructure may have negatively impacted upon the environment during the decades of its operation. The Preliminary Decommissioning Assessment should set out the actions and activities required to dismantle the infrastructure but also set out why particular infrastructure may be left in perpetuity, e.g., buried in the ground, such as buried cabling, and what the implications of this could be in terms of the potential to release hazardous chemicals into the environment over hundreds of years. Groundwater quality may vary over time such as changes in pH, and this may affect the integrity of cabling that is buried within shallow groundwater.

It is possible that the insulating properties of sections of the buried cabling reduce, and this may require the cabling to be removed and replaced. We advise this is considered within the ES. If it cannot be evidenced that cabling left in perpetuity in the ground will not release harmful chemicals into the environment then remnant cabling should be removed.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Rhian Isaac

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: southeastplanning@cyfoethnaturiolcymru.gov.uk

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

Planning and Environment Decisions Wales

Eich cyfeirnod
Your reference

CAS-03721-J2H3Y3

Sent by email

Ein cyfeirnod
Our referenceDyddiad
Date

5 February 2025

Llinell uniongyrchol
Direct line

03000 256007

Ebost
Email:Cadwplanning@gov.wales

Dear Sir / Madam,

Scoping - Afon Ddaw Solar and Energy Storage Project**REF: DNS CAS-03721-J2H3Y3**

Thank you for your letter of 18 December 2024 asking for Cadw's view on the above.

Cadw, as the Welsh Government's historic environment service, has assessed the characteristics of this proposed development and its location within the historic environment. In particular, the likely impact on designated or registered historic assets of national importance. In assessing if the likely impact of the development is significant Cadw has considered the extent to which the proposals affect those nationally important historic assets that form the historic environment, including scheduled ancient monuments, listed buildings, registered historic parks, gardens and landscapes.

These views are provided without prejudice to the Welsh Government's consideration of the matter, should it come before it formally for determination.

Advice

The scoping request is accompanied by a scoping report produced by RPS with chapter 8 Historic Environment describes the assessment methodology, the baseline conditions currently existing within the Site and in the surrounding areas and also sets out further survey work likely to be necessary in order to fully determine the potential impacts on heritage assets should it proceed. It also identifies potential mitigation to reduce any adverse effects of the proposed development.

In general, we concur with the information contained in this chapter, but we make the following comments: -

Section 8.2.1: The Historic Environment (Wales) Act 2023 was enacted on the 4 November 2024. This replaces The Ancient Monuments and Archaeological Areas Act

1979; The Historic Environment (Wales) Act 2016 and The Planning (Listed Building and Conservation Areas) Act 1990.

Sections 8.3.3; 8.3.10 & Table 8.3: There are no Registered Historic Battlefields in Wales; however, there is a non-statutory Inventory of Historic Battlefields in Wales that identifies historic battlefields.

Section 8.3.8: Cadw have considerable concerns about the potential for a direct impact of the cable route on scheduled monument Llanquian Wood Camp GM182. The applicant should be aware of the clear guidance given in section 6.1.24 of Planning Policy Wales and the need for Scheduled Monument Consent to be granted if there will be a direct impact on this scheduled monument.

Section 8.3.9: Cadw are available to discuss the need or not for an ASIDOHL2 assessment to be produced, once the optioneering process is completed. If it is determined that an ASIDOHL is required, Cadw should also be consulted on the Historic Landscape Character Areas that should be included in the assessment.

Section 8.3.11: The designated historic assets that are currently inside 3km and the Zone of Theoretical Views from the solar panels and the BESS are identified ON Annex A. Once the preferred cable routes, and the extents of the PV Areas and BESS Areas are confirmed we would expect a stage 1 assessment to be carried out for all designated historic assets inside 3km and the Zone of Theoretical Views, which will determine the need, if necessary, for stages 2 to 4 to be carried out for specific historic assets. The results of the stage 1 assessment should be included as an appendix in the EIA.

Section 8.3.13 Cadw agree that geophysical survey and archaeological trial trenching may be required to understand the extent and significance of undesignated archaeological sites. It is expected that these works will be undertaken before the completion of the EIA in order that their results can be included in the assessment of the impact of the proposed development on the Historic Environment.

Yours sincerely

Nichola Smith
Historic Environment Branch

Direct Impact

Registered Parks and Gardens:

PGW(Gm)41(GLA) Hensol Castle

PGW(Gm)8(RCT) Talygarn

Within a 3km developer ZTV of the solar farms:

Scheduled Monuments

GM001 Old Beaupre Castle

GM070 Caer Gwanaf

GM081 Gadlys

GM094 Llanblethian Castle

GM100 Caer Dynnaf hillfort

GM104 Round Barrows N of Breach Farm

GM182 Llanquian Wood Camp

GM225 Llanquian Castle

GM228 Ystradowen Castle Mound

GM230 Stalling Down Round Barrow

GM257 Llantrithyd Camp

GM292 Round Barrow 800m SE of Malborough Grange

GM298 Castell Moel

GM300 Fleminston Deserted Village

GM337 Llandough Castle, Remains of Hall

GM370 Felin Isaf Castle Mound

GM421 Castell Tal-y-Fan

GM442 Medieval Chapel of Talygarn

GM555 Llantrithyd Place: remains of house, relict gardens and wells

GM604 Treguff RAF Airfield Decoy Control Centre

GM626 Llanmaes Castle (Malefant Castle)

Registered Parks and Gardens:

PGW(Gm)34(GLA) Llanmihangel Place

PGW(Gm)38(GLA) Old Beaupre

PGW(Gm)43(GLA) Llantrithyd Place

PGW(Gm)9(RCT) Miskin Manor

Registered Historic Landscape:

HLW (SG) 1 Lencarfan, Vale of Glamorgan

Listed Buildings

2211	Cae'rwigau Uchaf	II
3026	Llwyn Rhyddid	II
13130	Flemingston Court Farmhouse	II*
13132	Great House (Ty Mawr), Aberthin	II*
13137	Llansannor Court	I
13143	Church of St Giles	II*

13146	St Quintin's Castle (Llanblethian Castle)	II*
13153	Parish Church of St Mary	II
13154	Fishweir Farmhouse	II
13164	Church of St. Brynach	II*
13166	Church of St Athan	I
13167	West Orchard Farmhouse	II
13168	West Farmhouse	II
13170	Parish Church of St Hilary	II*
13171	Old Beaupre Castle	I
13172	Old Beaupre Farmhouse	II*
13182	,6 &7, Church Street, Cowbridge, SOUTH GLAMORGAN,	II
13299	Batslays Farmhouse	II
13409	Myrtle Cottage, including attached outhouses	II
13413	The Cottage	II
13436	Barn and Stable to E of Llanmihangel Place	II*
	Telephone Call-box on the road verge to the north of the	
13439	Church of St Michael the Archangel	II
13440	Telephone Call-box to N of parish Church	II
13442	Telephone Call-box opposite Village Farm	II
	<i>Telephone Call-box at road junction in centre of Gileston</i>	
13451	<i>village</i>	//
13461	Barn at Court Farm	II
13462	Former Cartshed and Granary at Court Farm	II
13464	Combination Farm Building at Flemingston Court	II
13465	The Manor	II
13466	No 1 Manor Cottages	II
	Hafod Lodge to Hensol Castle (Also known as Bottom	
13467	Lodge)	II
13479	Telephone Call-box Outside Farmers Arms	II
13482	Hensol Castle (Including attached Courtyard Ranges to N)	I
13483	Bridge on main drive to Hensol Castle	II
13487	Barn at Fishweir	II
13511	Talgarn	II*
	Garden wall, gates and gate piers bounding S garden at	
13512	Talgarn	II
13593	Treguff Farmhouse	II*
13594	Ruins of Llantrithyd Place	II
13596	Cae'rwigau Isaf	II
13598	Llanwensan Fawr Farmhouse	II
13609	St Illtyd's Parish Church	II*
13641	Church of St Donat	I
13642	Great House	II
	The Sweetings (Including attached Barn and Stable Range	
15915	to W)	II
16414	Village Hall	II
16415	The Rectory	II
16416	Former Hall Range to S of Old Beaupre Castle	II
16417	Old Beaupre Barn	II
16418	Churchyard Cross at Parish Church of St Hilary	II
16419	Bassett Family Tomb Enclosure in Churchyard of Parish	II

	Church of St Hilary	
16420	The Bush Inn PH	II
16421	Pigsty at Church Cottage	II
16422	No 2 Manor Cottages	II
16423	Village Farm	II
16424	New Beaupre	II
19228	Agricultural Range at Ty-draw Farm	II
22302	Glamorgan Yeomanry War Memorial	II
22304	Eastfield	II
22307	Pen-y-Bryn	II
23916	Pantyquesta House	II
23917	Church of St Ann	II
23918	Sundial in S garden at Talygarn	II
23919	Lower terrace wall in S garden at Talygarn	II
23920	Upper terrace wall in S garden at Talygarn	II
23932	Gateway and gate to W boundary at Talygarn	II
23933	Telephone Call-box	II
25605	Yr Hen Fferm Dy	II
26947	Road Bridge over Nant Criafol	II
81301	Dovecote at Llanmaes House	II
82684	Church of St. Owain	II
82686	Cross base in Churchyard of Church of St. Brynach	II
82689	Llansannor House	II
82690	Llwynhelig House	II
82692	The Old Rectory	II
82694	West Wing of Llansannor Court (aka Court Cottage)	II
83108	Aderyn	II
	Anonymous Monument with railings in Churchyard of St	
83109	Athan	II
83115	Church of St Michael the Archangel	II*
83117	Detached Kitchen at Flemingston Court	II
83118	Dovecote at East Orchard	II
83119	Garden wall and House Ruins at Flemingston Manor	II
83125	Retainers' Hall at East Orchard	II
83128	The Old Rectory (aka Balfour House)	II
83405	Churchyard Wall of Church of St Donat	II

Within a 3km developer ZTV of the BESS:

Scheduled Monuments

GM032 Summerhouse Camp
GM297 West Aberthaw Medieval Site
GM601 Limpert Bay Anti-invasion Defences

Registered Parks and Gardens:

PGW(Gm)39(GLA) Fonmon Castle

Registered Historic Landscape:

HLW (SG) 1 Lancarfan, Vale of Glamorgan

Listed Buildings

13131	Gileston Manor	II*
24537	Rose Cottage	II
83111	Barn at West Aberthaw Farm	II
83112	Bullhouse (Old Chapel) at West Aberthaw Farm	II
83113	Cart Shed at West Aberthaw Farm	II
83116	Cross in Churchyard of Church of St Giles	II
83120	Garden Wall of West Aberthaw Farmhouse	II
83122	Heavy Horse Stable at West Aberthaw Farm	II
83123	Kitchen Garden Wall of Gileston Manor	II
83124	Pigsty at Gileston Manor	II
83127	Stable Block of Gileston Manor	II
83130	West Aberthaw Farmhouse	II
87647	Memorial at St Athan Boys' Village	II



Ref: DNS CAS-03721-J2H3Y3

Tanya Leck
Planning Officer
Planning and Environment Decisions Wales
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Via Email: PEDW.Infrastructure@gov.wales

27th of January 2025.

Dear Tanya Leck,

Re: Scoping Direction Consultation Response – DNS CAS-03721-J2H3Y3 – Proposed Afon Ddaw Solar and Energy Project Farm, approximately 9 sites between Junction 34 of the M4 and St Athan in the Vale of Glamorgan.

In reference to the recent e-mail from PEDW consulting the Department on the above Scoping Direction request, the Department offers the following response for your consideration regarding agricultural land quality and the use of soil resources.

For the Department, the key issues likely to be significantly affected by the development are:

- Best and Most Versatile (BMV) agricultural land.
- Maintaining soil services and functions.

1. Agricultural Land Classification (ALC) – Information and Advice:

The Department can confirm that we do not hold any previous ALC field survey information for the proposed sites. The Predictive ALC Map¹ notes that the site contains Best and Most Versatile (BMV) agricultural land within the proposed red-line boundaries (ALC Grades 1, 2 and 3a).

As per published Departmental Guidance², if BMV is identified on the Predictive Map, a detailed ALC survey is required to confirm the grades and their distribution. The Department has been in discussion with the applicant's surveyor to discuss survey requirements

¹ <https://www.gov.wales/agricultural-land-classification-predictive-map>

² <https://www.gov.wales/agricultural-land-classification-predictive-map-guidance>

previously. The Department is currently undertaking a validation of the ALC survey undertaken for the site and hope to confirm the grading on site by the end of February.

2. Best and Most Versatile (BMV) agricultural land policy.

It is highly probable, subject to validation of the ALC survey, that the proposal will involve development of +20ha of BMV agricultural land. The Department considers that BMV land impact should be scoped into the assessment, and will expect the applicant to provide clear evidence of how PPW paragraph 3.58 and 3.59 has been addressed in:

- i. how ‘*considerable weight*’ is given to protecting BMV land from development.
- ii. demonstrating an ‘*overriding need*’ if BMV land needs to be developed, and
- iii. clear application of the sequential test approach.

The Department would also highlight the policy clarification in the DCPO letter of 1st March 2022 regarding ‘*BMV agricultural land and solar PV arrays*’.

3. Policy Context:

The Department considers the policies and guidance below are also applicable to this development: -

- Technical Advice Note (TAN)⁶
- Paragraph 3.58 and 3.59 of Planning Policy Wales (PPW)⁴.
- Paragraph 6.4.3 (bullet 4) of PPW
- Policy 9 of the National Development Framework (NDF) – Future Wales⁵
- Policy 17 of NDF Future Wales - states ‘*all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment*’.
- Policy 18(11) of NDF Future Wales – sets out the requirement for ‘*...acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration*’.
- DCPO letter – ‘*BMV agricultural land and solar PV arrays*’ – 1st March 2022⁶

³ <https://www.gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities>

⁴ <https://www.gov.wales/planning-policy-wales>

⁵ <https://www.gov.wales/future-wales-national-plan-2040-0>

⁶ <https://www.gov.wales/best-and-most-versatile-agricultural-land-and-solar-pv-arrays>

4. Baseline information:

The location and extent of soils on site and their physical characteristics would be beneficial to assess potential impacts and inform decisions on infrastructure siting and decommissioning, restoration and beneficial after use of the site. The volumes of soil units that will be excavated for any on site infrastructure should be clear and based on survey evidence (this may be derived from the ALC survey information in part).

5. Infrastructure and potential impacts on soil functions (installation and decommissioning).

The type, location and level of infrastructure proposed as part of the development will need to be fully detailed for the assessment. The Assessment should include detailed information on the total number and spacing of piles installed; the extent of cable trenching and if any imported fill materials used (e.g. cement bound sand), track extent type and location, inverter pads number and locations and areas for construction compounds, etc.

The assessment will need to provide detailed information on the methodology for the installation and decommissioning of the infrastructure and, considering the soils on site, how any likely impacts have been assessed and avoided.

6. Outline Soil Management Plan (oSMP).

Mineral, organo-mineral and peat soils are finite and provide crucial ecosystem services and functions to Wales such as food production, water regulation, carbon storage, and biological functioning. It is welcome that the applicant proposes to produce an Outline Soil management Plan. The plan should be informed by the baseline ALC report and soil resources and physical characteristics, and be considered as part of the ES process.

The oSMP should be a clear scheme and programme setting out how all soils and their function will be conserved and reinstated and that can be confidently conditioned against.

The SMS should be presented in sufficient detail for the determining authority and statutory consultees to form a judgement as to its feasibility, and should include: -

- Soil stripping programme - volumes and types of soils affected.
- Soil handling techniques and procedure.
- Size, location, construction, management, and period of soil storage dumps.
- Proposed after use and restoration programme, including techniques and aftercare programme.

The Department considers in light of the infrastructure for commissioning, and the decommissioning of the development, impacts to soils (including the services and functions they provide) should be scoped into the assessment.

The advice expressed does not bind any other part of Welsh Government commenting on the proposal. I trust the above comments are clear and unambiguous.

Yours sincerely

Arwel Williams
Soil, Peatland & Agricultural Land Use Planning
Welsh Government
Department for Climate Change & Rural Affairs
Landscapes, Nature & Forestry Division
LQAS@gov.wales

Planning and Environment Decisions Wales
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Eich cyf / Your ref DNS CAS-03721-J2H3Y3

Ein cyf / Our ref 24/SW-7013

10 January 2025

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES)
ORDER 2012:**

**Afon Ddaw Solar and Energy Storage between Junction 34 and St Athan
Solar Farm with Battery Energy Storage System**

I refer to your consultation of 18/12/2024 regarding the above planning application and advise that the Welsh Government as highway authority for the M4 motorway does not issue a direction in respect of this application.

General Notes

- 1) The solar panels should be positioned and shielded so as not to cause any significant glint or glare to the users of the M4 motorway.
- 2) It is Welsh Government's understanding that no components will require Abnormal Indivisible Load (AIL) deliveries to site. Should this viewpoint be incorrect, the developer will be required to inform the Welsh Government, at the earliest opportunity, as further information would be required.

If you have any further queries, please forward to the following Welsh Government Mailbox
Lgc_development_control-south@gov.wales

Yours faithfully

Jason Ingram



Welsh Government Motorway and Trunk Road Network

‘Pulling Together’ Best Practice for Transporting Abnormal Loads in Wales

Instructions for use:

This guidance document is intended for use by hauliers and developers planning to generate abnormal load movements on Trunk Roads and Motorways in Wales.

It outlines the statutory process for planning and conducting safe and effective abnormal load movements in agreement with all relevant authorities and organisations.

This document supersedes any previous advice issued by the Welsh Government regarding this process.

TABLE OF CONTENTS

1	INTRODUCTION	2
1.1	Document purpose	2
1.2	Document structure	4
1.3	Intended audience	4
1.4	List of abbreviations.....	5
2	CATEGORIES OF ABNORMAL LOAD	6
2.1	Normal vehicle definition	6
2.2	Categories of abnormal loads.....	6
2.3	Summary	10
3	VEHICLE PREPARATION	11
3.1	Vehicle choice	11
3.2	Signage, markings and lighting	11
3.3	Attendants	11
3.4	Documentation	12
4	JOURNEY PREPARATION.....	13
4.1	Notification requirements.....	13
4.2	Route planning guidance	17
4.3	Notification processing	20
4.4	Post-notification considerations.....	23
4.5	Process summary.....	24
5	ABNORMAL LOADS AND DEVELOPMENT CONTROL	26
5.1	Planning applications.....	26
5.2	Planning conditions	26
6	SUMMARY OF ROLES AND RESPONSIBILITIES.....	31
7	USEFUL CONTACTS.....	32

1 INTRODUCTION

1.1 Document purpose

Our highways are, in the most part, built to accommodate a certain maximum vehicle size and weight. These vehicle limits are defined and upheld by UK law and most daily movements can be completed within them. However, some particular vehicle types and indivisible freight loads fall outside these limits and so are known as 'abnormal loads'. These typically include:

- Vehicle carrying an oversize or overweight load
- Mobile cranes
- Engineering plant
- Road recovery vehicles

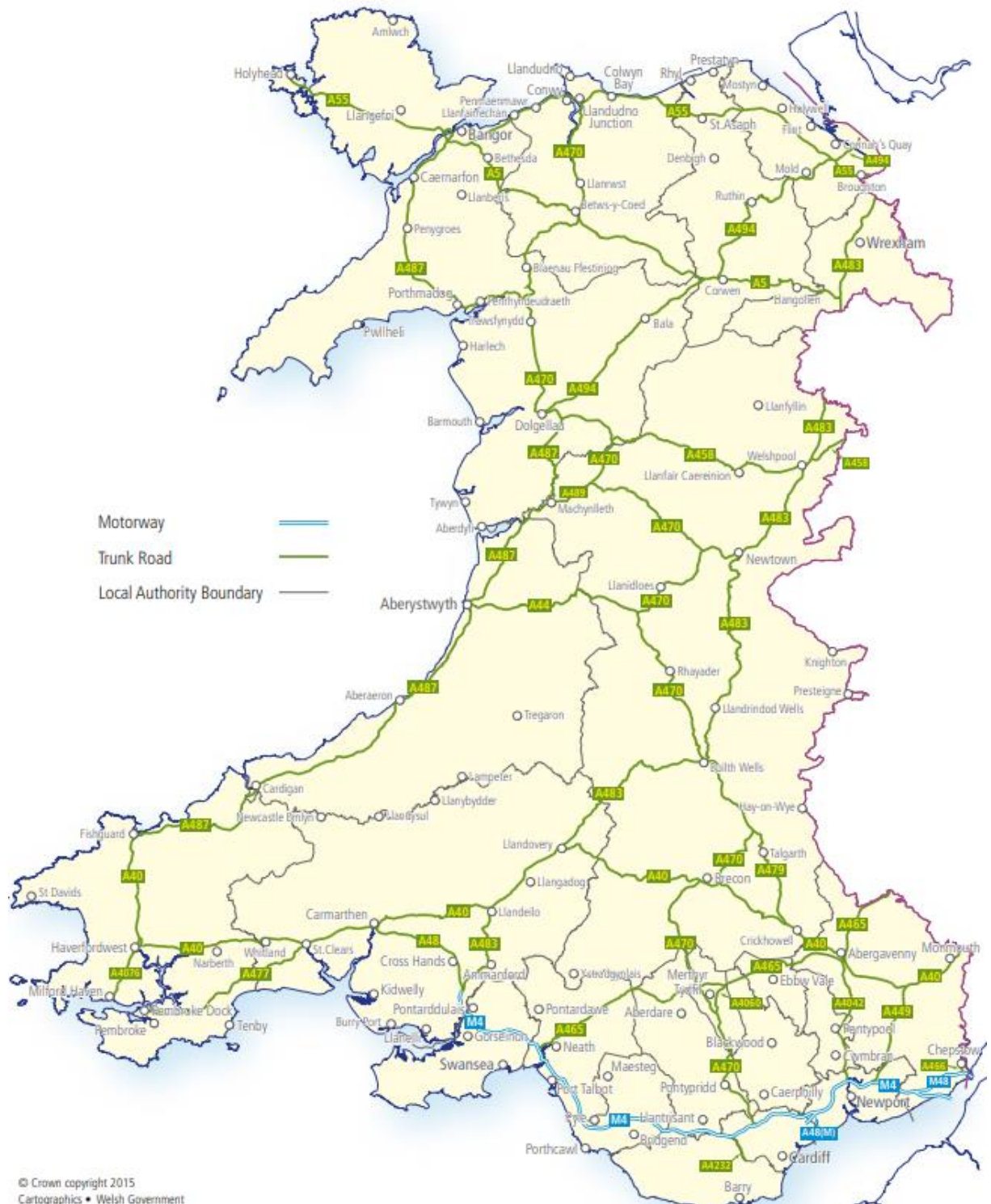


The movement of these types of loads by road is essential for supporting the UK economy, but it is also essential that the movements are carefully planned and executed to ensure they can be safely accommodated by the highway network. Movements of abnormal loads on the Welsh trunk road network (see Figure 1) can include vehicles as large as 8m wide, 55m long and 135te, while many thousand abnormal load movements take place in Wales every year. The consequences of these types of journeys being unplanned or poorly executed can therefore be significant, and include:

- Damage to the network when abnormally wide or heavy loads travel over weak structures or along narrow roads
- Delay to all road users if movement timing or route is poorly planned
- Harm to wider public if mismanaged movement results in an accident

- Delays and cost implications to industry when vehicles unable to complete journey on time

Figure 1 Trunk Road Network Wales (Traffic Wales, 2015)¹



¹ <https://traffic.wales/sites/default/files/2018-10/151021-wales-trunk-roads-map-en.pdf>

To avoid such impacts and their potential legal consequences, those responsible for transporting abnormal loads by road in the UK are required by law to plan and execute each movement in agreement with relevant authorities to ensure the incident-free passage of every load from origin to destination.

Welsh Government is the devolved government for Wales. The Welsh Ministers are the Highway Authority for trunk roads and motorways in Wales under the Highways Act 1980. They are supported by civil servant officials who work across devolved areas that include key areas of public life, including transport and the management of trunk roads and motorways.

This document therefore comprises a Welsh Government Procedure and Advice Guidance (PAG) document which aims to summarise the legal process which must be followed in the planning and execution of all abnormal load movements on trunk roads within Wales and to clarify the roles and responsibilities of the various parties involved.

By pulling together, we make roads in Wales safer and more effective.

1.2 Document structure

The document is structured as follows:

- The legal definition of an abnormal load is discussed in Section 2
- Guidance on vehicle preparation is provided in Section 3
- Guidance on journey preparation is provided in Section 4
- Planning for abnormal loads through the development control process is outlined in Section 5
- A summary of roles and responsibilities is presented in Section 6, and
- A list of useful contacts is provided in Section 7

1.3 Intended audience

This document is primarily addressed at the party responsible for conducting an abnormal load movement on Welsh trunk roads (most commonly the haulier), but is relevant to all parties involved in its safe planning and execution, as follows:

- Consigners/agents
- Hauliers
- Attendants
- Escorting services

- Police
- DVSA
- Highway Authorities and other bridge owners
- Planning authorities
- Developers / agents or consultants
- Statutory utilities

1.4 List of abbreviations

The following abbreviations are used throughout this document:

- AIL – Abnormal Indivisible Load
- ALO – Abnormal Loads Officer
- AWR – Road Vehicles (Authorised Weight) Regulations 1998
- STGO – The Road Vehicles (Authorisation of Special Types) (General) Order 2003
- C&U – The Road Vehicles (Construction and Use) Regulations 1986
- DBFO – Design, Build, Finance, Operate companies
- DMRB – Design Manual for Roads and Bridges
- HA&BO – Highway Authorities and other Bridge Owners
- NH – National Highways (*previously Highways England*)
- DVSA – Driver and Vehicle Standards Agency
- LA – Local Authority
- NMWTRA – North and Mid Wales Trunk Road Agent
- SWTRA – South Wales Trunk Road Agent
- TAA – Technical Approval Authority
- TMP – Traffic Management Plan
- TTRO – Temporary Traffic Regulation Order
- WG – Welsh Government

2 CATEGORIES OF ABNORMAL LOAD

Abnormal loads, and the obligations of those moving them, are defined in the UK by legislation. This section provides a summary of the different legal categories of abnormal load and their implications.

2.1 Normal vehicle definition

The maximum size and weight of vehicles which can use the UK road network without journey notification having to be provided to relevant authorities is defined by the following regulations:

- The Road Vehicles (Construction and Use) Regulations 1986 – “C&U”
- Road Vehicles (Authorised Weight) Regulations 1998 – “AWR”

These permit a vehicle and its load to use UK roads without notification as long as the combination falls within the following maximum size and weight limits:

- Rigid length: up to 18.65m
- Width: up to 2.9m
- Weight: up to 44,000kg
- Axle load: up to 10,000kg (or 11,500kg for single driving axle)

If a vehicle and its load lie outside any of these limits, it is referred to as an abnormal load.

There is no legal height limit for vehicles but, wherever possible, the overall height of a vehicle and load should not exceed 4.95m so that the maximum use can be made of the motorway and trunk road network. This will ensure that loads are less than 5.03m in height, which is the minimum maintained headroom requirement on UK highways.

2.2 Categories of abnormal loads

Legal categories of abnormal load vary to cover different combinations of vehicle size and weight. This is because different types of abnormal load have implications for both:

- Vehicle choice, and
- Route choice

The implications in each case are considered in the following subsections.

2.2.1 Abnormal loads and vehicle choice

The size of an abnormal load has implications for the size of the transporting vehicle, with larger loads generally requiring larger vehicles.

In addition, heavier loads put greater demands on a vehicle's chassis, suspension, tyres, brakes and engine, so heavier abnormal loads also require a higher specification of vehicle.

These distinctions between the impacts of size and weight result in the following abnormal load vehicle legal categories:

- C&U/AWR compliant vehicles are permitted within that legislation to carry oversized abnormal indivisible loads up to a limit, but not overweight loads
- Overweight loads, and those beyond C&U size limits, can be carried by three categories of higher specification vehicles designed to standards prescribed by The Road Vehicles (Authorisation of Special Types) (General) Order 2003 ("STGO") and are subject to lower speed limits depending on load weight
- Loads heavier and/or larger than those permitted by STGO require Special Order approval by the UK Secretary of State under Section 44 of the UK Road Traffic Act 1988

The application of these categories to abnormal load sizes and weights is summarised in the following table.

Table 1 Abnormal load legal category by size/weight combination

Gross weight	Axle weight	Load Dimensions				
		W ≤2.9m L ≤18.65m	W >2.9m L >18.65m	W >4.3m L >27.4m	W >5m L >27.4m	W >6.1m L >30m
≤44,000kg	≤11,500kg	C&U	C&U	STGO Category 1	STGO Category 1	Special Order
>44,000kg	≤11,500kg	STGO Category 1	STGO Category 1	STGO Category 1	STGO Category 1	Special Order
>50,000kg	>11,500	STGO Category 2	STGO Category 2	STGO Category 2	STGO Category 2	Special Order
>80,000kg	>12,500	STGO Category 3	STGO Category 3	STGO Category 3	STGO Category 3	Special Order
>150,000kg	>16,500kg	Special Order	Special Order	Special Order	Special Order	Special Order

Key:  = Abnormal load legislation

This table highlights that:

- C&U vehicles are limited to carrying abnormal loads which are oversized but not overweight
- STGO categories increase with abnormal load weight up to 150,000kg
- Special Order vehicles are for extra heavy and/or very large abnormal loads

2.2.2 Abnormal loads and route choice

As well as vehicle type implications, abnormal loads also present route choice implications, as follows:

- The wider and longer a load, the greater the potential for conflict with other road users and roadside furniture / structures
- The heavier a load, the greater the potential for damage to underlying infrastructure and for delays to other road users due to slower speeds

The transporting of abnormal loads therefore presents increased road safety, infrastructure damage and traffic management risks to the network which need careful management and mitigation in liaison with relevant authorities. This is required by legislation covering abnormal load movements and the following table summarises:

- The organisations requiring pre-trip notification of the abnormal load journey details, and
- The minimum notification period in each case, where 'd' refers to working days (excluding Sundays and Bank Holidays) and 'w' refers to weeks

Table 2 Pre-journey notification requirements by abnormal load category

Gross weight	Axle weight	Load Dimensions				
		W ≤2.9m L ≤18.65m	W >2.9m L >18.65m	W >4.3m L >27.4m	W >5m L >27.4m	W >6.1m L >30m
≤44,000kg	≤11,500kg	N/A	Police – 2d			
>44,000kg	≤11,500kg	HA&BO – 2d	Police – 2d HA&BO – 2d		Police – 2d HA&BO – 2d NH – 2w	
>50,000kg	>11,500					
>80,000kg	>12,500		Police – 2d HA&BO – 5d		Police – 2d HA&BO – 5d NH – 2w	
>150,000kg	>16,500kg					Police – 5d HA&BO – 5d NH – 10w

Key:  = Abnormal Load legislation  = VR1 form notice  = C&U
 = STGO C1  = STGO C2  = STGO C3  = Special Order

HA&BO = Highway Authority and other Bridge Owners NH = National Highways

This table highlights that:

- Where just load size increases, only the Police require notification, until the size reaches such that HA&BOs and National Highways require notifying also
- Conversely, where just load weight increases, HA&BOs require notification, until the weight reaches such that the Police and National Highways require notifying also
- For combinations of size and weight increases, both the Police and HA&BOs need notifying, together with National Highways for the largest/heaviest loads
- In all cases, the minimum notification period increases with load size and weight
- For loads over 5m wide, UK Secretary of State approval must be sought through submission of a VR1 form²

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/471962/VR1_form.pdf

- For loads over 6.1m wide, UK Secretary of State approval must be sought through submission of a Special Order form³

The approval of VR1 and Special Order forms has not been devolved by the UK Government to Welsh Government and so currently remains the responsibility of National Highways. However, for Special Order movements which will result in trips on the Welsh trunk road network, and for any other abnormal load movement deemed applicable, Welsh Government may require a Traffic Management Plan (TMP) to be submitted for approval before the proposed journey date. TMP requirements are defined in Section 4.1 below.

VR1 and Special Order load movements should also be planned with due cognisance of Highway England's 'Water preferred policy guidelines'⁴ which require such journeys to be completed as far as possible by either inland or coastal waters wherever it is practical, economic and environmentally desirable to do so.

2.3 Summary

UK law defines abnormal load categories based on the degree of vehicle and route preparation required in each case to ensure a smooth and safe movement, with preparation requirements increasing with load size and weight.

Further guidance on vehicle and route preparation is provided in the following two sections.

³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/503102/BE16_form_revised_Sept_15.pdf

⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/799833/WPP_guidelines_2019_DfT_consultation_revision.pdf

3 VEHICLE PREPARATION

Ensuring that an abnormal load vehicle meets legal requirements and is fit-for-purpose is essential for ensuring safe and reliable journeys. This short section is not intended to cover all legal matters relating to abnormal load vehicle preparation but summarises key requirements that contribute to safe movements through Wales.

3.1 Vehicle choice

Where the carrying of a load causes the vehicle and load to lie outside of normal C&U/AWR size and/or weight limits, the party responsible for its transportation is legally required to divide the load into smaller components wherever possible, except where this would involve undue expense or risk of damage.

Assuming the load cannot be further subdivided and so is considered an abnormal indivisible load, the selected vehicle must comply with the legislation applicable to the dimensions and weight of the combination, as set out in Table 1 above.

3.2 Signage, markings and lighting

It is both a legal requirement and best practice to clearly sign, mark and light an abnormal load vehicle to ensure the visibility of vehicle size and extremities for other road users. For a summary of requirements and best practice, refer to the following documents:

- 'Special types enforcement guide', by Gov.UK⁵
- 'Lighting and marking for abnormal loads vehicles code of practice', by National Highways⁶

3.3 Attendants

Both C&U and STGO legislation require that an attendant travel with the vehicle where:

- The overall width of the vehicle together with the width of any lateral projection or projections of any load carried on it is 3m or less but the length of any lateral projection of a load carried on it exceeds 305mm.

⁵ <https://www.gov.uk/government/publications/lighting-and-marking-for-abnormal-loads-vehicles-code-of-practice>

⁶ <https://www.gov.uk/government/publications/special-types-enforcement-guide/special-types-enforcement-guide#abnormal-loads>

- The overall width of the vehicle together with the width of any lateral projection or projections of any load carried on it exceeds 3.5m where a rigid unit and any projection of the load exceeds 18.75m in length.
- Special types combination exceeds 25.9m, the length of any forward projection of the load exceeds 2m, the length of any rearward projection of the load exceeds 3.05m.

Where attendants are required on special types vehicles and three or more vehicles are involved travelling in convoy, attendants need only be carried in the first and last vehicles of that convoy.

The attendant's duty is to warn the driver or any other person of any danger likely to be caused by the presence of the vehicle or vehicles on the road and to ensure road signs and notices are complied with.

3.4 Documentation

If UK Secretary of State approval is required and obtained for the journey via either a VR1 or Special Order form, the approval documents must be carried in the vehicle during the approved journey as the means of demonstrating authorised exemption from C&U/AWR regulations.



4 JOURNEY PREPARATION

The key to an effective and safe abnormal load journey is good preparation in liaison with relevant authorities, as required by legislation and by this document. This section provides guidance on the journey planning and notification process.

4.1 Notification requirements

4.1.1 Authorities to be notified

As summarised in Table 2 above, the relevant authorities who require notification of abnormal load movements may include:

- Police
- Highway authorities and other bridge owners
- National Highways

In Wales, highway authorities comprise:

- Local authorities for non-trunk roads, and
- Welsh Government for trunk roads (with functions delegated to NMWTRA/SWTRA and DBFO companies)

Bridge authorities/owners most commonly comprise:

- Local authorities for non-trunk road structures
- Welsh Government for trunk road structures (with functions delegated to NMWTRA/SWTRA and DBFO companies)
- Network Rail for rail bridges
- Canal and River Trust for canal bridges

4.1.2 Notice periods

Notification to relevant authorities must be provided before any abnormal load journeys take place. The minimum notification periods for each authority are summarised by abnormal load category in Table 2 above. Depending on the type of abnormal load, this shows that:

- Each Police force area traversed by the route must be given at least 2 to 5 days' notice

- Each HA&BO area traversed by the route must be given at least 2 to 5 days' notice
- If VR1 form approval is required, National Highways must be given at least 2 weeks' notice
- If Special Order approval is required, National Highways must be given at least 10 weeks' notice

Where a Temporary Traffic Regulation Order is required, it should be noted that this can also take up to 12 weeks to process (see Section 4.3.1.3 below for more information).

The reason for requiring minimum notification periods is to allow due time for notified authorities to assess the proposed journey and for applicants to satisfactorily address any issues raised before the journey takes place. More information on the notification assessment process is provided in Section 4.3 below, but it should be noted that notified journeys can only legally take place:

- If all relevant authorities are notified with sufficient notice period and either no response is received before the journey date or any response received before the journey date is addressed by the applicant to the satisfaction of the responding authority, and
- In the case of VR1 or Special Order movements, explicit written approval is received

In addition, where a TMP has been requested by Welsh Government, Welsh Police forces can request evidence of TMP approval before providing escort support services.

It is important to note that notifications which do not satisfy the legal minimum notice periods will generally not be accepted by authorities unless a movement is required as part of a genuine emergency and the notification is accompanied by a telephone call. Equally, notifications can be submitted earlier than the minimum notice period, while pre-notifications and consultations with authorities are also encouraged where there is uncertainty about whether a journey notification would be accepted.

4.1.3 Information required

4.1.3.1 Statutory notification requirements

The level of notification information required depends on the category of abnormal load being moved, with information requirements increasing with movement size and/or weight. A summary of requirements per movement category is provided in the following table.

Table 3 Information required by notification type

Information	C&U	STGO	VR1	Special Order
List of authorities notified	☒	☒	☒	☒
Operator details	☒	☒	☒	☒
Movement route, time and date	☒	☒	☒	☒
Description of load	☒	☒	☒	☒
Vehicle type and registration	☒	☒	☒	☒
Vehicle dimensions and laden weight	☒	☒	☒	☒
Axle weights and spacing		☒		☒
Proof of current indemnity to HW&BO		☒		
More detailed journey information			☒	
More detailed vehicle and load information				☒

4.1.3.2 Traffic Management Plan requirements

Where a TMP is required to be submitted to Welsh Government (see sections 2.2.2 and 4.1.2), the following journey details should be provided:

1. Proposals for transporting AILs from their point of entry to the Welsh trunk road network to the site that minimise any impact on the safety and free flow of trunk road traffic
2. Loaded dimension and weight of AIL
3. Anticipated escort arrangements
4. Methodology for managing trunk road traffic during journey, including identification of passing places and holding areas as necessary
5. Journey contingency plans in the event of incidents or emergencies
6. Estimated journey duration and timings along the route
7. Evidence of trial run that mimics the movement of the AIL along the access route where appropriate, at the discretion of the Highway Authority
8. Swept path analysis modelling at all potential horizontal and vertical constraints along the access route where appropriate, at the discretion of the Highway Authority
9. Proposals for the temporary or permanent modification of any affected street furniture along the access route and details of how this would be managed and reinstated

4.1.4 Notification submission

All relevant notification and indemnity forms can be found on the Gov.UK website⁷ which can be emailed, faxed or posted to relevant authorities.

However, it is recommended that an online notification portal is used to submit C&U and STGO abnormal load notifications. The standard UK system is ESDAL⁸, maintained by National Highways, which allows users to:



- Plan an appropriate route according to vehicle size and weight
- Notify all relevant Police, highway authorities and other bridge owners of the planned journey
- Get advance notice of any possible route problems
- Save vehicle details and routes for future use

Subject to the preferences of individual authorities and Police forces, other online notification portals can also be used, but the applicant should satisfy themselves that any system employed satisfies all legal requirements for making abnormal load journey notifications.

The TMP, if required, should be submitted to the Welsh Government ALO, as detailed in Table 7 below.

4.1.5 Notification dispensations

Dispensations may be issued by Police to hauliers to move abnormal loads through their area without prior notification if they satisfy the following requirements:

- Abnormal loads no wider than 3.5m
- Multiple loads of a like nature on a regular basis
- Routes limited to motorways and selected A roads only

The granting of a dispensation has the potential to significantly reduce the number of notifications hauliers will have to submit. However, the dispensation should reference specific vehicles in the fleet and so are not transferable without prior notice to the Police. Drivers should also carry a copy of the dispensation and present it to an officer on request. Dispensations must be renewed annually on application and are not automatically renewed.

⁷ <https://www.gov.uk/government/publications/abnormal-load-movements-application-and-notification-forms>

⁸ <https://www.gov.uk/esdal-abnormal-load-notification>

Any dispensation granted will not take account of any roadworks commencing during the dispensation period or ongoing at the point of issue and hauliers will still be expected to check their route.

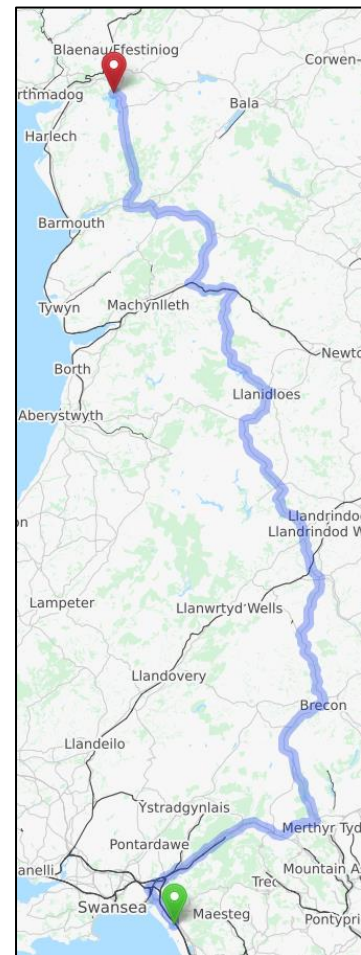
4.2 **Route planning guidance**

4.2.1 **General principles**

It is ultimately the haulier's responsibility to identify a route and execute a journey which ensures the legal, safe and least disruptive passage of an abnormal load from trip origin to trip destination. Relevant authorities will provide guidance and, where necessary, require journey amendments, but the legal responsibility and liability for the safe completion of each journey lies with the haulier.

In selecting an appropriate route for inclusion in an abnormal load journey notification, the following general principles should be followed:

- Routing preference should always be given to using the highest classification roads, with as much of the journey as possible being routed along motorways, trunk roads and A-roads. These routes are best equipped to carry large and heavy loads, and are least likely to present size and weight restrictions (the busiest abnormal load routes on the Welsh trunk road network typically include the A55, A494 dual carriageway, A483 dual carriageway and the A5 near Chirk)
- Routes should also avoid passing through population centres wherever possible to minimise conflict with both infrastructure constraints and other road users
- Routes must avoid roads presenting size and/or weight restrictions which fall within the parameters of the vehicle/load combination being transported
- One key advantage of using online journey notification systems like ESDAL is that it allows users to plot a route based on vehicle size and weight based on mapping which contains information on network size and weight restrictions.



Potential applicants should also be aware of Ordnance Survey 'Mastermap Highways Network' products which allow point-to-point route planning and contains a comprehensive and continuously updated national database of:

- Road classification and name
- Height, weight, width and length restrictions
- Turn restrictions
- Access restrictions
- Locations of bollards and traffic calming
- Narrow roads and pinch points
- Maintenance responsibility

In addition, it is recommended that applicants consider potential planned roadworks at the route planning stage using the online resources detailed in Section 4.4.1 below.

In combination with online notification portals, hauliers therefore now have access to route planning tools which maximise the chances of both successful abnormal load notifications and successful abnormal load journeys.

4.2.2 Other considerations

4.2.2.1 Travel timing

In planning an abnormal load route, the following timing related factors should also be considered:

- Journey times which exceed statutory driver working time limits will require a stopping place to be identified along the route which can accommodate abnormal load vehicles
- Journey distances which require vehicle refuelling will require a fuel station to be identified along the route which can accommodate abnormal load vehicles
- During hours of darkness, most Police forces only allow abnormal load movements to take place on motorways and on some lit dual carriageways. Journeys on all other road types which cannot be completed during daylight hours will therefore need to be routed via an abnormal load layby where layover can take place
- Some authorities will not allow abnormal load movements through their area or parts of their area during peak traffic hours. This can affect both route choice and journey timing

For planning stops and/or refuelling, National Highways publish on the Gov.uk website a list⁹ and map¹⁰ of laybys and motorway service stations which can accommodate abnormal loads.

In calculating journey times, typical congestion on the planned day of travel should be taken into account, as well as the speed limit applicable to the abnormal load vehicle type. STGO loads are speed limited by category and road type. The most common categories are limited as follows:

Table 4 STGO speed limits by category and road type

STGO category	Speed limit		
	Motorway	Dual carriageway	Other roads
Category 1 (width ≤ 4.3m)	60mph	50mph	40mph
Category 1 (width > 4.3m) & Categories 2 & 3	40mph	35mph	30mph
Special Order ¹¹	20mph	20mph	20mph

Source: Special Types Enforcement Guide

4.2.2.2 Escort considerations

Consideration should also be given during route planning as to whether either a private or Police escort is required to accompany the abnormal load movement.

There is no legal requirement for a vehicle moving under STGO or a Special Order to be accompanied by an escort vehicle, but National Highways advises that the following dimensions may be applied to decide if the movement of an abnormal load requires an escort:

Table 5 National Highways guidelines on escort requirements

Abnormal load measurement	Motorway	Other
Width	>4.6m	>4.1m
Length	-	>30.5m
Weight	130t	100t

Source: Lighting and marking COP for abnormal load self escorting vehicles, National Highways

The above measures are for guidance and may differ between individual Police forces who may wish to vary these requirements. The final decision rests with the Police (see Section 4.3.1.2 below).

See the full National Highways Code of Practice¹² for further details on escorting abnormal load movements.

⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/494606/Location_of_Abnor_mal_Load_Laybys_-_1143.pdf

¹⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/494607/Lay-by_and_MSA_Map_-_1143.pdf

¹¹For girder frame trailers over 150 tonnes and draw-bar trailers over 250 tonnes, the limit is 12mph

¹²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/503105/Lighting_and_marking_COP_for_abnormal_load_self_escorting_vehicles_HE_rebranding_v1.pdf

4.3 Notification processing

4.3.1 Police notification assessment process

4.3.1.1 Public Safety Risk Assessment

In processing an abnormal load journey notification, the primary concern of the Police is to assess the potential impact of the journey on public safety. The relevant duty officer within the Police will therefore check the notification and carry out a risk assessment based on the agreed 'risk category' levels set out below:

- Low risk notifications – no necessity for further action. General advice provided to the haulier and information on control measures if necessary.
- Medium risk notifications – the Police will check the movement complies with relevant legislation and inform the haulier if the notification is rejected. A decision on the necessity of a Police escort or further traffic management measures will be considered for all notifications considered medium risk.
- High risk notifications – the Police will check the movement complies with relevant legislation and inform the haulier if the notification is rejected. A decision on the necessity of a Police escort or further traffic management measures will be considered for all notifications considered high risk.

Based on this risk assessment, the Police forces may reject or amend any time, date or route that they consider may have an impact on public safety. If a route is deemed unsuitable, the haulier will be notified and will then be responsible for identifying an alternative route or additional traffic management measures sought from local authorities, National Highways or the Police.

4.3.1.2 Escort requirements

If the risk assessment determines that the safety of road users may be compromised to an unacceptable extent, an escort may be specified regardless of the vehicle dimensions specified in Table 5 above. The haulier will therefore be responsible for provision of an escort vehicle which conforms to the type specified by National Highways.

As per ACPO guidance, Police escorts will only be provided if specifically requested by a haulier or if the risk assessment identifies the need for temporary road closures to ensure safe passage of the load through restricted sections of the route. A minimum of 8 days notice will be required for a Police escort. If necessary, charges for Police escorts will be incurred by the haulier at 'Special Policing



Services' rates. For journeys where a TMP has been requested by Welsh Government, Welsh Police forces can request evidence of TMP approval before providing escort support services.

4.3.1.3 Temporary Traffic Regulation Order

If the risk assessment identifies the need for a temporary road closure on any section of the route, the haulier will be required to apply for a Temporary Traffic Regulation Order (TTRO) under the Road Traffic Regulation Act 1984 to allow officers and other Accredited Persons¹³ to stop and direct moving traffic or to suspend on-street parking. Applications for TTROs on the non-trunk road network should be made through the relevant local authority, and through NMWTRA/SWTRA for trunk road applications.

Hauliers should be advised that TTROs can take up to 12 weeks to process.

4.3.2 HA&BO notification assessment process

In processing an abnormal load journey notifications, the primary concern of highway authorities and other bridge owners is to assess the potential impact of the journey on highway structures.

4.3.2.1 Check for height and width restrictions

On receipt of a notification or notification enquiry, the Abnormal Loads Officer (ALO) for each of the affected HA&BOs will use details of the vehicle configuration to undertake audit checks of known height and width restrictions at structures along the route, and any other known structural constraints (temporary or permanent). Alternative routes or configurations may be suggested to avoid any identified structural constraints.

The ALO may request the haulier or enquiring party provides horizontal and/or vertical swept path analysis as necessary, based on topographical survey data. If the submitted swept path analysis is considered inadequate, the ALO may request the haulier or enquiring party undertakes a trial run to mimic the movement of the abnormal load vehicle through the constraint. The trial run vehicle should demonstrate the extent of the load envelope in terms of width and height in a clearly visible manner using a collapsible template. It should be noted that this may require a Police escort.

If the ALO is not satisfied that the constraint can be negotiated by the load, the HA&BO shall inform the haulier or enquiring party, as well as other relevant authorities as appropriate, that the load cannot be moved. WG can also implement Permanent or Temporary Traffic Regulation Orders under the Road Traffic Regulation Act 1984 to limit the maximum gross vehicle weight on a structure if required.

¹³ The Police Reform Act allows DVSA and other agencies to use Policing Powers to be able to replace officers at planned events, under the provisions of the Community Safety Accreditation Scheme (CSAS), as long as they are "employed" by the Accredited Agency to do so.

4.3.2.2 Check for structural capacity

On receipt of a notification or notification enquiry, the ALO will undertake checks referring to existing structural certification along the notified route, in consultation with the HA&BO's structures team if necessary, based on the loading and vehicle configuration.

If checks identify structures which may not be able to carry the load, the haulier may suggest an alternative route which will then need to be submitted to the relevant HA&BO for approval.

Further checks will be undertaken if an alternative route cannot be found. This will be undertaken by the ALO or a structural engineer. If these checks identify structures which would not be able to carry the load, the haulier may propose alternative vehicle configurations until a suitable configuration is found.

If neither a suitable route nor suitable vehicle configuration can be found and the HA&BO rejects the proposal to move on this basis, then the haulier may commission the assessment of route structures by a suitably qualified and experienced consultant at their own expense. All load assessments require Technical Approval according to BD2, 'Technical Approval Of Highway Structures'¹⁴. WG are the Technical Approval Authority (TAA) for Trunk Roads in Wales.



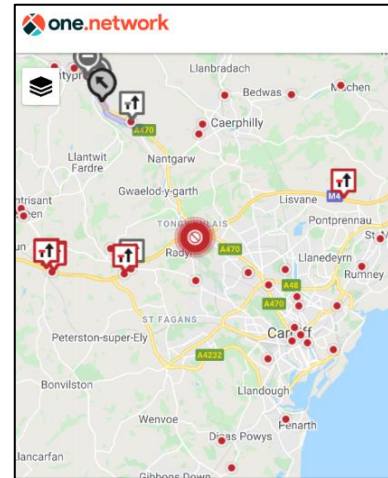
¹⁴ <https://www.croftse.co.uk/wp-content/uploads/2018/04/BD2-12-Highways-Structures-Approval.pdf>

4.4 Post-notification considerations

4.4.1 Roadworks and disruptions

The haulier should check for roadworks and disruptions along the route on the day of travel before commencing an agreed journey. Roadworks can particularly affect the passage of wide loads, and national details of live roadworks can be checked at <https://one.network/> or at <https://traffic.wales/> (also see Section 7 for Traffic Wales' contact details).

The haulier should consult in advance with the relevant ALO and the party responsible for the works if there is any doubt about whether the works affect the agreed route for the journey.



In the event where roadworks make the agreed route impassable, an agreement should be reached with the party responsible for the works to make passage possible at an agreed time, if feasible.

If not feasible, or if an unforeseen disruption makes a section of the agreed route impassable, the haulier is expected to assess where it is most appropriate and safe to park up and to contact the Police. If there are no safe areas then traffic management may be required to safely control traffic around the abnormal load vehicle. In addition to Police contact details, all hauliers are also recommended to carry contact details of the relevant local highway authorities and national traffic management firms to aid swift action in case of such an event.

4.4.2 Enforcement considerations

Once in transit, abnormal load vehicles can be subject to enforcement checks by either Police or DVSA officers. The vehicle may be escorted to a safe stopping place if any of the following conditions are met:

- Police have not received notification of movement
- Notification of movement is invalid due to inaccuracies
- Movement is not taking place in accordance with approved notification or authorised amendments
- Abnormal Indivisible Load vehicle or load is incorrectly marked or lit
- Abnormal Indivisible Load vehicle does not have the required attendant

- Abnormal Indivisible Load vehicle does not have the escort vehicle required by Police
- Driver is currently committing a 'driving hours' offence under tachograph regulations or will have committed an offence before reaching next stopping point
- Driver is currently committing an 'insufficient rest' offence under tachograph regulations
- Any C&U offences not exempted by STGO 2003 are evident

Where non-compliance is evident, the driver and operator are liable to prosecution under C&U regulations. Penalties for non-compliance can range from a fine¹⁵ to the temporary restriction or suspension of the haulier's operating licence by the Traffic Commissioner for Wales¹⁶. Officers might also prevent onward travel of the vehicle until any areas of non-compliance are adequately addressed.

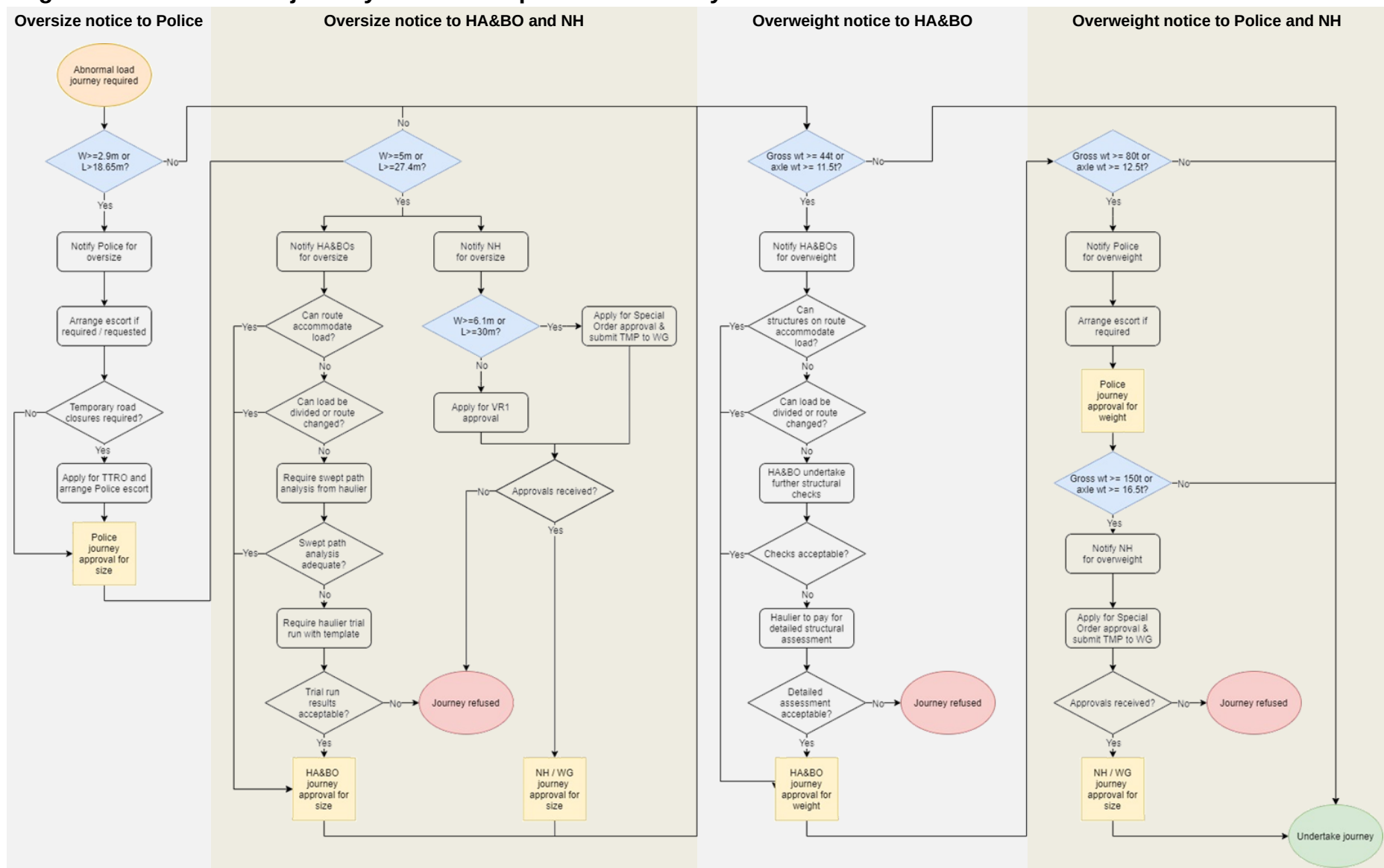
4.5 Process summary

A summary of the main steps in the legally required notification process is shown in the following figure.

¹⁵ <https://www.gov.uk/government/publications/guide-to-graduated-fixed-penalties-financial-deposits/dvsa-roadside-checks-fines-and-financial-deposits>

¹⁶ <https://www.gov.uk/traffic-commissioner/decision-and-penalties>

Figure 2 Abnormal load journey notification process summary



5 ABNORMAL LOADS AND DEVELOPMENT CONTROL

5.1 Planning applications

Planning applications for developments which are likely to generate abnormal load movements, either during construction or operation, may be required to be submitted with a Transport Assessment in accordance with Welsh Government Planning Policy Technical Advice Note 18: Transport¹⁷ Regarding abnormal load movements, the Transport Assessment should identify:

- Estimated movement volumes of abnormal loads to and from the site
- The most appropriate abnormal load routes to and from the site
- Mitigation proposals where necessary for route to safely accommodate load

Failure to demonstrate that the site can be safely accessed by the loads it will generate can be grounds for refusal of planning permission.



5.2 Planning conditions

Where planning permission is granted for a development which will generate abnormal load movements on the Welsh trunk road network, the following planning conditions will be attached.

¹⁷ <https://gov.wales/sites/default/files/publications/2018-09/tan18-transport.pdf>

5.2.1 Structural assessment

No on-site development works shall be undertaken until:

- a. an assessment of the capacity and impact on all structures along those parts of the highway network which shall be utilised during the construction of the development including bridges, culverts, retaining walls, embankments, and
- b. details of any improvement works required to such structures as a result of construction of the development

have been submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The required improvement works identified in the assessment shall be completed prior to the commencement of any Abnormal Indivisible Load (AIL) deliveries to the development site.

5.2.2 Condition surveys

Condition surveys of all highway features along those parts of the highway network which shall be utilised during the construction of the development shall be undertaken prior to, during and on completion of the construction phase of the development. The survey reports shall be submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) within 28 days of the surveys.

5.2.3 Liability for incidental damage

Prior to the commencement of development works, a scheme to provide for the remediation of any incidental damage directly attributable to the development to the parts of the highway network which will be utilised during the construction of the development including street furniture, structures, highway verge and carriageway surfaces shall be submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The scheme shall be implemented as approved throughout the construction phase of the development.

5.2.4 Traffic Management Plan

AILs associated with the development shall be delivered strictly in accordance with a Traffic Management Plan (TMP) as shall be agreed with the relevant highway authority. In this respect, the TMP shall be submitted to and approved in writing by Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of any works. The TMP shall include:

- a. proposals for transporting AILs from their point of entry to the Welsh trunk road network to the site that minimise any impact on the safety and free flow of trunk road traffic
- b. evidence of trial runs that mimic the movement of the worst case AILs along the access route where appropriate, at the discretion of the Highway Authority
- c. number and size of AILs, including loaded dimensions and weights
- d. number and composition of AIL convoys, including anticipated escort arrangements
- e. methodology for managing trunk road traffic during AIL deliveries, including identification of passing places and holding areas as necessary
- f. convoy contingency plans in the event of incidents or emergencies
- g. estimated convoy journey durations and timings along the route, including release of forecast traffic queues
- h. swept path analysis modelling the movement of the worst case AILs at all potential horizontal and vertical constraints along the access route where appropriate, at the discretion of the Highway Authority
- i. proposals for the temporary or permanent modification of any affected street furniture along the access route and details of how this would be managed
- j. plans for the reinstatement of any temporary works after completion of the construction phase
- k. land ownership must be clarified on all drawings showing proposed highway modifications. The developer shall be responsible for the acquisition and reinstatement of all third party land including re-instatement of boundary features
- l. proposals to liaise with all relevant stakeholders and members of the public regarding construction traffic and AIL movements
- m. consideration of the cumulative impact of other abnormal load generating schemes proposing to use all or part of the same access route

AILs associated with the maintenance and decommissioning of the development shall leave the site strictly in accordance with a TMP as shall be agreed with the relevant highway authority. In this respect, the TMP shall be submitted to and approved in writing by Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of any removal, replacement of decommissioning works.

5.2.5 Highway works

No development works shall be undertaken until full details of any highway works associated with the construction of layover areas, passing places and highway improvements as agreed with each relevant highway authority including:

- a. the detailed design of any works
- b. geometric layout
- c. construction methods
- d. drainage, and
- e. street lighting

have been submitted to and approved in writing by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The highway works shall be completed in accordance with the approved details prior to the commencement of any AIL deliveries to the development site.

No development works shall be undertaken until the developer demonstrates rights of access to all proposed works that are not part of the highway network to the satisfaction of the local planning authority.

5.2.6 Road Safety Audit

The applicant shall undertake a Road Safety Audit of the scheme (Stages 1 – 4) in accordance with the Design Manual for Roads and Bridges GG 119¹⁸. The applicant shall agree the required measures with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of works on site.

5.2.7 Section 278 Agreement

The applicant shall enter into an Agreement with the Welsh Ministers under Section 278 of the Highways Act 1980 to enable the Applicant to undertake agreed improvement works on the trunk road. This Agreement will contain details of the improvement works, construction conditions and financial arrangements under which agreed measures can be put in place, including indemnifying the Welsh Ministers against third party claims. Without such an

¹⁸ <http://bailey.persona-pi.com/Public-Inquiries/M4-Newport/C%20-%20Core%20Documents/6.%20Transport%20and%20Engineering/DMRB/vol5/section2/hd1915.pdf>

agreement in place, any consent that may be granted cannot be implemented.

For further information on this matter please refer to Welsh Government Procedure & Advice Guidance PAG 109/18: Section 38,184, and 278 Agreements under the Highways Act 1980¹⁹.

5.2.8 Access onto the trunk road

Full details of the highway works associated with the proposed new access onto the trunk road shall be submitted by the applicant to WG, as the Welsh trunk road highway authority, prior to the commencement of any works on the development site. Details of proposed highway works should be as indicated on the submitted plans including the detailed design, geometric layout, construction and drainage.

The visibility splays shown on the submitted plans of the proposed new access onto the trunk shall at all times be kept free of any planting, tree or shrub growth, or any other obstruction in excess of 1.05m above the adjoining carriageway.

All highways works shall achieve full compliance with DMRB.



¹⁹ <https://gov.wales/sites/default/files/publications/2018-04/109-18-section-38-184-and-278-agreements-under-the-highways-act-1980.pdf>

6 SUMMARY OF ROLES AND RESPONSIBILITIES

The roles and responsibilities for each party set out in this document are summarised in the following table.

Table 6 Summary of roles and responsibilities of parties involved in abnormal load movements

Party	Role	Responsibilities
Consigners/agents	Generating/commissioning abnormal load movement	Commissioning of fully compliant haulier for planning and executing abnormal load movements. Preference should be given to hauliers with FORS accreditation (see https://www.fors-online.org.uk/cms/)
Haulier	Preparing and executing abnormal load movement	- Planning subdivision of loads wherever possible to avoid need for abnormal load movements (see Section 3.1) - Ensuring selected vehicle complies with the legislation applicable to the dimensions and weight of the combination (see Table 1) - Ensure vehicle and load is clearly signed, marked and lit according to regulations (see Section 3.2) - Ensure attendants accompany vehicle if required (see Section 3.3) - Carry VR1 or Special Order documents in vehicle where applicable (see Section 3.4) - Notify relevant authorities of abnormal load journey with sufficient notice period, including a Traffic Management Plan if required (see Section 4.1.2) - Address and, if necessary, pay for any requirements emerging from notification assessment process (see Section 4.3) - Undertake/procure structural assessment if required (see Section 4.3.2.2) - Accommodate for roadworks and disruptions on day of travel (see Section 4.4.1) - Execute journey according to approved notification (see Section 4.4.2) and, where applicable, to approved Traffic Management Plan (see Section 2.2.2)
Abnormal load attendant	Accompanying abnormal load on journey where required	- Accompany abnormal load vehicle for full journey where legislation requires - Warn the driver or any other person of any danger likely to be caused by the presence of the vehicle or vehicles on the road (see Section 3.3)
Abnormal load escort	Escorting abnormal load on journey where required	- Comply with National Highways guidance in vehicle preparation and abnormal load escort protocol (see Section 4.2.2.2) - Comply with any specific instructions provided by Police (see Section 4.3.1.2)
Police	Assessing public safety impacts of abnormal load notifications, escorting where required and enforcing regulations in transit	- Undertake public safety risk assessment for all abnormal load notifications (see Section 4.3.1.1) - Advise haulier with sufficient notice if any amendments required to notified journey or if notification refused (see Section 4.3.1.1) - Advise haulier with sufficient notice if private or Police escort required and if TTRO required (see Section 4.3.1.2 and 4.3.1.3) - Resource the Police escort, as required (see Section 4.3.1.2) - Enforce abnormal load regulations in transit for public safety (see Section 4.4.2)
DVSA	Vehicle standards, licencing and enforcement	Enforce abnormal load regulations in transit for public safety (see Section 4.4.2)
HB&BOs	Assessing infrastructure impacts of abnormal load notifications	- Assess relevant journey notifications in terms of capacity of route infrastructure to accommodate proposed abnormal load dimensions and weight (see Section 4.3.2) - Advise haulier if journey notification is rejected or approved (see Section 4.3.2 Error! Reference source not found.).
Planning authorities	Determining planning applications for abnormal load generating developments	- Ensure planning applications consider abnormal load trip generation and demonstrate suitable routeing and, where necessary, mitigation (see Section 5.1) - Apply planning conditions where necessary to ensure abnormal load routes are fully planned and approved and that all journeys are undertaken according to an approved Traffic Management Plan (see Section 5.2)
Developers	Seeking planning consent for abnormal load generating developments	- Submit Transport Assessment with planning application to identify abnormal load trip generation, suitable routeing and, where necessary, mitigation (see Section 5.1) - Discharge planning conditions, where applicable, by ensuring abnormal load routes are fully planned and approved and by committing to all journeys being undertaken according to an approved Traffic Management Plan (see Section 5.2)

7 USEFUL CONTACTS

The process outlined in the above sections requires input from and contact with a number of organisations in order to ensure all relevant authorities are notified, and that abnormal load movements occur safely and without causing disruption to the network.

The following table provides a list of key contacts and contact details for queries associated with the movement of abnormal loads in Wales.

Table 7 Useful contacts for abnormal load related queries

Organisation	Contact details
Welsh Government ALO	Tel: 02920 629465 Email: AbnormalLoads@gov.wales
Dyfed-Powys Police	Tel: 01267 226011 Email: AbnormalLoads@dyfed-powys.pnn.Police.uk
Gwent Police	Tel: 01633 642470 Email: abnormal-loads@gwent.pnn.Police.uk
North Wales Police	Tel: 01492 805407 Email: abloadnotify@nthwales.pnn.Police.uk
South Wales Police	Tel: 01656 655555 Email: Special-Movements@south-wales.pnn.Police.uk
NMWTRA	Tel: 01545 571960 Email: abnormalloads@nmwtra.org.uk
SWTRA	Tel: 01792325965 Email: abnormalloads@southwales-tra.gov.uk
Traffic Wales	Tel: 0300 123 1213
National Highways Abnormal Loads Team	Tel: 0300 4703004 Email: abnormal.loads@highwaysengland.co.uk
Network Rail Abnormal Loads Team	Tel: 01908 783 140 Email: abnormalloadsenquiries@networkrail.co.uk
Blaenau Gwent County Borough Council	Tel: 01633 644716 Email: AbnormalLoads@monmouthshire.gov.uk
Bridgend County Borough Council	Tel: 01656 642857 Email: abloads@bridgend.gov.uk
Caerphilly County Borough Council	Tel: 01633 644716 Email: AbnormalLoads@monmouthshire.gov.uk
Cardiff City & County Council	Tel: 02922 330966 Email: abnormal.loads@cardiff.gov.uk
Carmarthenshire County Council	Tel: 01267 228307 Email: abnormalloads@carmarthenshire.gov.uk
Ceredigion County Council	Tel: 0154 5572430 Email: technical.services@ceredigion.gov.uk
Conwy County Borough Council	Tel: 01492 575365 Email: abnormalloads@conwy.gov.uk
Denbighshire County Council	Tel: 01824 706884 Email: abnormal.loads@denbighshire.gov.uk
Flintshire County Council	Tel: 01352 704810 Email: abnormalloads@flintshire.gov.uk
Gwynedd County Council	Tel: 01286 679306 Email: LlwythAbnormal@gwynedd.llyw.cymru
Isle of Anglesey County Council	Tel: 01248 752312

Organisation	Contact details
Merthyr Tydfil County and Borough Council	Tel: 01685 726241 Email: [REDACTED]
Monmouthshire Council	Tel: 01633 644716 Email: AbnormalLoads@monmouthshire.gov.uk
Neath Port Talbot County Borough Council	Tel: 01639 686492 Email: abloads@npt.gov.uk
Newport City Council	Tel: 02920 803500 Email: Loads.Abnormal@capita.co.uk
Pembrokeshire County Council	Tel: 01437 776153 Email: abloads@pembrokeshire.gov.uk
Powys County Council	Tel: 01597 826619 Email: highways.management@powys.gov.uk
Rhondda Cynon Taf County Borough Council	Tel: 01443494706 Email: highwaysabnormalloads@rctcbc.gov.uk
Swansea Council	Tel: 01792 636182 Email: Abnormal.Loads@swansea.gov.uk
Torfaen County and Borough Council	Tel: 01633 644716 Email: AbnormalLoads@monmouthshire.gov.uk
Vale of Glamorgan Council	Tel: 02920 673106
Wrexham County Borough Council	Tel: 01978 729723 Email: abnormal_loads@wrexham.gov.uk

From: [ORC](#)
To: [PEDW – Seilwaith / Infrastructure](#)
Subject: RE: EIA Scoping Consultation - DNS CAS-03721-J2H3Y3 - Afon Ddaw Solar and Energy Storage Project
Date: 20 February 2025 10:59:19
Attachments: [image002.png](#)
[image003.jpg](#)

Hi Georgia,

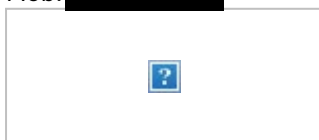
I've reviewed the application, and I can confirm there is no Welsh Water assets in the location specified that rely on 'point to point' communications that would be affected by the proposed development.

Regards,
Julia

Julia Winson

OT Service & Scheduling Coordinator
TechOps Service Team | Operational Services

Mob: [REDACTED]



Please click [here](#) for the most up to date versions of our company **PT IMS forms**

From: PEDW.Infrastructure@gov.wales

Sent: 20 February 2025 10:20

To: ORC

Subject: RE: EIA Scoping Consultation - DNS CAS-03721-J2H3Y3 - Afon Ddaw Solar and Energy Storage Project

***** External Mail *****

Good morning Julia,

We have received the following grid references from the applicant.

Parcels	Grid Reference	<i>Easting</i>	<i>Northing</i>
PV Area 1	ST 01716 71780	301716	171780
PV Area 2	ST 02275 74494	302275	174494
PV Area 3	SS 99774 75772	299774	175772
PV Area 4	ST 02317 76638	302317	176638
PV Area 5	ST 04107 77689	304107	177689
PV Area 6	ST 05272 78630	305272	178630
PV Area 7	ST 03380 79242	303380	179242
PV Area 8	ST 01889 79327	301889	179327
PV Area 9	ST 00047 79613	300047	179613
BESS Facility (western parcel)	ST 02134 66954	302134	166954
BESS Facility (eastern parcel)	ST 02617 66736	302617	166736

I would be grateful if you could provide any comments by 27th February. If this is not possible, please let me know.

Kind regards,

Georgia

Georgia Peters

[hi | she / her]

Swyddog Cynllunio | Planning Officer

Penderfyniadau Cynllunio ac Amgylchedd Cymru | Planning and Environment
Decisions Wales

Llywodraeth Cymru | Welsh Government

Llinell Uniongyrchol | Direct Line: [REDACTED]

PCAC Ymholiadau Cyffredinol Ffôn | PEDW General Enquiries Tel: 0300 123 1590



<https://llyw.cymru/penderfyniadau-cynllunio-ac-amgylchedd-cymru> |

<https://gov.wales/planning-and-environment-decisions-wales>

From: PEDW – Seilwaith / Infrastructure

Sent: 28 January 2025 10:30

To: ORC <ORC@dwrcymru.com>

Subject: RE: EIA Scoping Consultation - DNS CAS-03721-J2H3Y3 - Afon Ddaw Solar and Energy Storage Project

Good morning Julia,

Thanks for getting in touch. I will request grid references for the field parcels from the applicant and provide these once submitted.

Kind regards

Tanya

Tanya Leck

[hi | she / her]

Swyddog Cynllunio | Planning Officer

Penderfyniadau Cynllunio ac Amgylchedd Cymru | Planning and Environment
Decisions Wales

Llywodraeth Cymru | Welsh Government

Llinell Uniongyrchol | Direct Line: [REDACTED]

PCAC Ymholiadau Cyffredinol Ffôn | PEDW General Enquiries Tel: 0300 123 1590



<https://llyw.cymru/penderfyniadau-cynllunio-ac-amgylchedd-cymru> |

<https://gov.wales/planning-and-environment-decisions-wales>



The Coal
Authority

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

For the attention of: Tanya Leck

Development of National Significance

[By email: PEDW.infrastructure@gov.wales]

20 December 2024

Dear Tanya Leck

Re: DNS CAS-03721-J2H3Y3 Afon Ddaw Solar Project

Solar Farm with Battery Energy Storage System; APPROXIMATELY 9 SITES BETWEEN JUNCTION 34 OF THE M4, AND ST ATHAN IN THE VALE OF GLAMORGAN.

Thank you for your notification of 18 December 2024 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

We have reviewed the site location plan provided and can confirm that the site falls within the Coal Authority's defined Development Low Risk Area. On this basis we have no specific comments to make.

However, in the interest of public safety, it is requested that the Coal Authority's Standing Advice note is drawn to the applicant's attention, where relevant.

Yours

The Coal Authority Planning Team

From: [Shirley Rance](#) on behalf of [NSIP Applications](#)
To: [PEDW – Seilwaith / Infrastructure](#)
Cc: [NSIP Applications](#)
Subject: DNS - Afon Ddaw Solar and Energy Storage Project - EIA - HSE Response dated 23/12/24
Date: 23 December 2024 13:35:23
Attachments: [image002.png](#)

Dear Tanya Leck,

Thank you for your email dated 18 December 2024 consulting HSE on the Proposed Afon Ddaw Solar and Energy Storage Project - Development of National Significance (DNS).

Please find HSE's advice below.

HSE's land use planning advice - CEMHD5 Contribution to Consultation

1. With reference to **Figures 1, 1a, 1b & 1c Land Landscape Planning Designations (Figure 6.1 - Landscape Designations)** found in [<https://planningcasework.service.gov.wales, Case Reference: DNS CAS-03721-J2H3Y3 - Afon Ddaw Solar and Energy Storage Project>] on which are shown redlined Application Site Boundaries, there is an area in the southernmost section (near Pistyll Brake) of the proposed development that appears to fall within HSE public safety consultation zones associated with Major Accident Hazard Pipeline(s) operated by Wales & West Utilities:
 - a. Pentrebane / St. Athan [p2] (HS033) [HSE ref: 7298, Transco ref: 1567]
2. The redlined areas do not currently fall within the consultation distances of any Major Accident Hazard Installation(s).
3. HSE will not advise against the proposed development, providing the proposed development does not introduce populations, either permanent or temporary, into any of HSE's public safety consultation zones which are assigned to individual Major Accident Hazard Pipeline(s). Further information is available at <https://www.hse.gov.uk/landuseplanning/methodology.htm>
4. Please note if at any time a new Major Accident Hazard Pipeline is introduced or existing Pipeline modified prior to the determination of a future application, the HSE reserves the right to revise its advice.
5. Likewise, if prior to the determination of a future application, a Hazardous Substances Consent is granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed project, again the HSE reserves the right to revise its advice.

Would Hazardous Substances Consent be needed?

6. The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) (Wales) Regulations 2015.
7. Hazardous Substances Consent would be required if the proposed development site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.
8. Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Explosives sites

CEMHD 7's response is no comment to make as there are no HSE Licensed explosive sites in the vicinity of the proposed development.

Regards

NSIP Consultation Team



Tanya Leck
Planning Officer
Planning and Environment
Decisions Wales
Welsh Government
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ
PEDW.Infrastructure@gov.wales

Our Ref: JM/19-15115 (BR13)
Your Ref: DNS CAS-03721-J2H3Y3
Date: 07 January 2025
Contact: Watch Manager J. Mann
Tel: [REDACTED]
E-mail: firesafety@southwales-fire.gov.uk

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING ACT 1990
PROPOSAL: SOLAR FARM WITH BATTERY ENERGY STORAGE SYSTEM
LOCATION: APPROXIMATELY 9 SITES BETWEEN JUNCTION 34 OF THE M4
AND ST ATHAN IN THE VALE OF GLAMORGAN.**

I acknowledge receipt of the notification to the South Wales Fire and Rescue Authority ("The Authority") in relation to the above application.

The proposed site plan in relation to the above has been examined and The Authority wish the following comments to be brought to the attention of the committee/applicant. It is important that these matters are dealt with in the early stages of any proposed development.

Changes to our climate and weather patterns will have a significant impact on the well-being of both current and future generations. In line with the **Well-being of Future Generations (Wales) Act 2015** and the **Future Wales – the national plan 2040** framework document, the following areas should be considered early in the planning process:

The climate emergency is likely to increase the risk of flooding as a result of sea-level rises, more frequent severe weather systems and more intense rainfall. Planning authorities should adopt a precautionary approach of positive avoidance of building developments in areas of flooding from the sea or from rivers. Surface water flooding will affect the choice of location and the layout and design of schemes and these factors should be considered at an early stage in formulating any development proposals.

Wildfires are a significant potential threat particularly in populated areas adjoining green spaces such as mountains or forestry. Therefore, it is critical that new developments are designed with this in mind. Where a new development is proposed in an area which is at risk of a wildfire, consideration should be given on how to mitigate the spread of wildfires. For example, sustainable land management could assist with prevention measures.

Large Commercial Solar Arrays, Battery Energy storage Facilities, Electric Vehicle Parking/Charging Facilities:

Fires involving the installations detailed above can be very difficult to extinguish. Conditions can cause a thermal runaway within battery cells, which is a highly exothermic reaction creating toxic, flammable, and/or explosive chemical atmospheres.

The developer of such sites should ensure they have suitable safety measures to contain and restrict the spread of fire, using fire-resistant materials and adequate separation between locations where energy systems may be stored.

Active fire safety systems should be incorporated into the design if necessary and may include, automatic fire detection systems, automatic fire suppression and smoke control systems.

The Authority recognises that the charging of electric vehicles and the use of batteries (including lithium-ion) as Energy Storage Systems (ESS) is a new and emerging practice in the global renewable energy sector. As with all new and emerging practices within UK industry, developers should consider the risks associated with such systems early in the design stage of the project.

Standing Advice.

The site plan/s of the above proposal has been examined and The Authority would wish the following comments to be brought to the attention of the planning committee/applicant. It is important that these matters are dealt with early on in any proposed development:

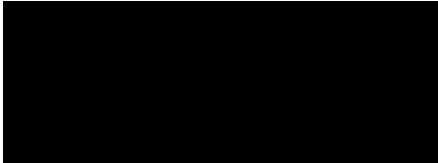
- The Fire Authority has no objection to the proposed development and refers the Local Planning Authority to any current standing advice by the Fire Authority about the consultation.

The developer should also consider the need for the provision of:-

- a. adequate water supplies on the site for firefighting purposes; and
- b. access for emergency firefighting appliances

Should the applicant require further information in relation to these matters they should contact the above named fire safety officer.
Yours faithfully,

Duly signed and authorised by



for Assistant Chief Fire Officer

cc: WATERGEN@southwales-fire.gov.uk

Enc: BR13 Appendix

Appendix

1.0 Access For Fire Appliances

Typical vehicle access route requirements:

Appliance Type	Min Width Road	Min Width Gate	Min Turning Circle between Kerb
Pump	3.7m	3.1m	16.8m
Aerial Appliance	3.7m	3.1m	26.9m

Min Turning between Wall	Min Height Clearance	Min Capacity Tonnes
19.2	3.7m	14
29.0	4.0m	23

Pedestrian Priority

Pedestrian schemes must take into account the need for permanent and unobstructed access for firefighting appliances. The siting of ornamental structures such as flower beds, must take account, not only of the access requirements of the fire appliances but the need to be able to site them in strategic positions; in particular, account must be taken of the working space requirements for aerial appliances. Consultation must take place with the Fire and Rescue Authority during the earliest planning stages of any development to ensure adequate access for fire appliances, their siting and use.

2.0 Water Supplies for Firefighting

The existing output of the statutory water supply network may need to be upgraded in certain parts of the local plan area to cater for firefighting needs of new developments. It is recommended that this provision be a condition of planning consent.

Access to Open Water Supplies

Where development of water front sites takes place, the need for permanent and unobstructed access for firefighting appliances to the water should be made a condition of any planning consent.

Consultation must take place with the Fire and Rescue Authority during the earliest planning stages of any development to ensure access for fire pumping appliances is satisfactory.

2.1 Housing

Minimum main size 100mm. Housing developments with units of detached or semi-detached houses of not more than two floors should have a water supply capable of delivering a minimum of eight litres per second through any hydrant on the development.

Housing developments with units of more than two floors should have a water supply capable of delivering a minimum of 20 to 35 litres per second through any hydrant on the development.

2.2 Transportation

Lorry/Coach Parks - Multi-Storey Car Parks-Service Stations

Minimum main size 100mm. All of these amenities should have a water supply capable of delivering a minimum of 25 litres per second through any hydrant on the development or within a vehicular distance of 90 metres from the complex.

2.3 Industry

In order that an adequate supply of water is available for use by the Fire and Rescue Authority in case of fire, it is recommended that the water supply infrastructure to any Industrial estate is as follows:

Light Industrial

Minimum Main Size 100mm
Up to one hectare, 20 litres per second

Commercial/Industrial

Up to two hectares, 35 litres per second - Minimum Main Size 150mm

High Risk Industrial

Two to three hectares 50 litres per second - Minimum Main Size 150mm.
Over three hectares, 75 litres per second.

In rural areas it may not be possible to provide sufficient mains water. To overcome this, static or river supplies would be considered on site at the above flow rates for at least one hour.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements, as high risk units may require a greater flow.

2.4 Shopping, Health and Community Facilities

Village Halls

Should have a water supply capable of delivering a minimum of 15 litres per second through any hydrant on the development or within a vehicular distance of 100 metres from the complex.

Primary Schools and single storey Health Centres

Should have a water supply capable of delivering a minimum of 20 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

Secondary Schools, Colleges, Large Health and Community Facilities

Should have a water supply capable of delivering a minimum of 35 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

2.6 Distances Between Fire Hydrants

The distance between fire hydrants should not exceed the following:

Residential areas	-	200 metres
Industrial Estates (Subject to operational needs)	-	150 metres
Town centre areas	-	90 metres
Commercial (Offices & Shops)	-	100 metres
Residential Hotels	-	Adjacent to access
Hotels	-	Adjacent to access
Institutional (Hospitals & Old Persons Homes)	-	Adjacent to access
Old Persons Homes	-	Adjacent to access
Educational (Schools & Colleges)	-	Adjacent to access

2.7 Conclusion

Developers should hold joint discussion with Dwr Cymru - Welsh Water or the National Rivers Authority and the Fire and Rescue Authority to ensure that adequate water supplies are available in case of fire. The Fire and Rescue Authority reserve the right to ask for static water supplies for firefighting on site as a condition of planning consent, if the supply infrastructure is inadequate for any given risk.

Health and Safety Executive
Shirley Rance | Business Support Team
Health and Safety Executive | CEMHD - DBST
NSIP.Applications@hse.gov.uk



From: PEDW.Infrastructure@gov.wales <PEDW.Infrastructure@gov.wales>

Sent: Wednesday, December 18, 2024 2:48 PM

Subject: CM: DNS - Afon Ddaw Solar and Energy Storage Project - EIA - consultation email

Dear Consultees,

Please find attached the consultation letter relating to the above potential DNS application.

If you have any queries or are likely to have any difficulties responding by Thursday 23 January 2025, please let us know as early as possible.

Kind regards

Tanya

Tanya Leck

[hi | she / her]

Swyddog Cynllunio | Planning Officer

Penderfyniadau Cynllunio ac Amgylchedd Cymru | Planning and Environment
Decisions Wales

Llywodraeth Cymru | Welsh Government

Llinell Uniongyrchol | Direct Line: [REDACTED]

PCAC Ymholiadau Cyffredinol Ffôn | PEDW General Enquiries Tel: 0300 123
1590



<https://llyw.cymru/penderfyniadau-cynllunio-ac-amgylchedd-cymru> |

<https://gov.wales/planning-and-environment-decisions-wales>

Sganiwyd y neges hon am bob feirws hysbys wrth iddi adael Llywodraeth Cymru. Mae Llywodraeth Cymru yn cymryd o ddifrif yr angen i ddiogelu eich data. Os cysylltwch â Llywodraeth Cymru, mae ein [hysbysiad preifatrwydd](#) yn esbonio sut rydym yn defnyddio eich gwybodaeth a sut rydym yn diogelu eich preifatrwydd. Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn anfon ateb yn Gymraeg i ohebiaeth a dderbynnir yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi. ----- On leaving the Welsh Government this email was scanned for all known viruses. The Welsh Government takes the protection of your data seriously. If you contact the Welsh Government then our [Privacy Notice](#) explains how we use your information and the ways in which we protect your privacy. We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.