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Planning & Environment Decisions Wales

EIA Scoping Direction
DNS CAS-02366-F2C3K8
Candwr Solar Farm

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This Scoping Direction is provided on the basis of the information submitted to Planning and Environment Decisions Wales on 30 September 2025, 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 the installation of ground mounted solar photovoltaic arrays and associated work by Candwr Solar Farm Limited.

The request was accompanied by a Scoping Report (SR) dated September 2025 that outlines the proposed scope of the Environmental Statement (ES) for the proposed development:

'2025-09-30 – EIA Scoping Request – Scoping Report' and accompanying documents, available via the Planning Casework Portal - https://planningcasework.service.gov.wales/ and search CAS-02366-F2C3K8.

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 site is located at land at Court Farm, Ponthir, Monmouthshire, approximately 5.2km north-east of the City of Newport and 1km east of the village of Ponthir. The site has an area of 118.8 ha, incorporating cable routes, and is comprised of agricultural land across thirteen land parcels which are spread across three Local Authority boundaries including Monmouthshire Council, Torfaen County Borough Council and Newport City Council.

Further information is available in section 2.1 of the SR.

3. Proposed Development

The proposal as described in the SR is for installation and operation of ground mounted solar photovoltaic arrays with all associated works, equipment and necessary infrastructure on the Application Site. The proposed installed generation capacity is up to 46 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:

- Monmouthshire County Council (MCC)
- Newport City Council (NCC)
- Torfaen County Borough Council (TCBC)
- Natural Resources Wales (NRW)
- Cadw
- Agricultural Land Use & Soil Policy, Welsh Government
- Transport Directorate, Welsh Government
- Dŵr Cymru
- Health and Safety Executive (HSE)
- Civil Aviation Authority
- South Wales Fire and Rescue Service

PEDW also received the following additional submissions:

- N. Hennah and I. Williams on behalf of Candwr Solar Objection Group (CSOG)
- C. Thomas
- F. Bromfield
- S. Williams
- P. Fox MS for Monmouth and N. Asghar MS for South Wales East
- Protect Candwr and Ponthir Countryside Group

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

In accordance with Schedule 4, Paragraph 5(e) of the 2017 Regulations, the ES should include a description of the likely significant effects of the development on the environment resulting from “the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance to be likely affected or the use of natural resources”.

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

The Applicant should ensure that relevant schemes identified are addressed in the ES using the tiered approach set out in the Advice.

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 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:

Human Health (not as a standalone chapter)
Population (not as a standalone chapter)
Hydrology and Pollution
Transport and Access
Air Quality
Noise and Vibration (not as a standalone chapter)
Climate (not as a standalone chapter)
Cultural Heritage and Archaeology
Risk of Major Accidents and Disasters
Material Assets (not as a standalone chapter)
Waste (not as a standalone chapter)
Landscape and Visual
Ecology
Glint and Glare
Agricultural Circumstances

7. Table 1: Planning and Environment Decisions Wales Comments

ID	Reference in Scoping Report	Issue	Comment
ID.1		Defining the scope of the project	PEDW notes TCBC's concerns in their response regarding the description and of the proposed development for EIA purposes. Whilst TCBC advise that the project should include the operations of the water treatment works, having considered the case law quoted in their response (*R (Ashchurch Rural Parish Council) v Tewkesbury Borough Council* [2023] EWCA 101) I do not consider the solar farm to have a standalone purpose or to be an enabler of the water treatment works as it is currently functioning without it. As advised by TCBC, this should be justified in the introduction of the ES.
	Applicant's proposed Aspects proposed to be scoped out		
ID.2	5.1	**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 into the ES, but not as a standalone chapter.**
ID.3	5.2	**Human Health**	PEDW agrees that a standalone chapter is not required and that Human Health should be addressed in appropriate chapters of the ES. The SR states that construction activities will be appropriately controlled to an acceptable level through the adoption of a Constriction Environmental Management Plan (CEMP), it is recommended that this is included as a technical appendix to the ES. **This topic is therefore scoped into the ES, but not as a standalone chapter.**
ID.4	5.3	Ground Conditions and Land	PEDW and NRW agree with the reasoning set out in the SR to scope out Ground Conditions and Land.
ID.5	5.4	**Water Environment**	Given that the majority of the site is within Flood Zone 1 and no built development is proposed in Flood Zone 2 or 3, NRW considerers a Flood Consequences Assessment outside of the EIA process to be appropriate, therefore fluvial flooding can be scoped out of the ES. MCC agree and advise that this is acceptable mitigation from a flood risk perspective.

ID	Reference in Scoping Report	Issue	Comment
			MCC add that any SuDS attenuation or infiltrating features should not be built within flood zones unless the individual features are designed to receive the additional flow from the catchment. The Applicant's attention is drawn to MCCs comments regarding SuDS. CSOG, F. Bromfield and S. Williams raise concerns regarding increased impermeable ground surface as a result of the development and the impact of surface water runoff on the Candwr Brook. They consider the proposed impermeable hard surface area and disruption to natural drainage patterns will lead to more frequent and severe flooding downstream in Ponthir. The Applicant should address these comments in the ES and liaise with the Lead Local Flood Authorities (LLFAs). The Applicant's attention is drawn to NRW's advice in the response in Appendix 1 regarding high voltage fluid filled cables have the potential to result in contamination/pollution of groundwater. NRW refer to the information that should be included with a planning application and guidance/resources. TCBC advise that the following assessments should be scoped into the ES and should inform and consider how during construction and operation surface after would not affect the water quality that leads to the River Usk and Severn: • Water Feature Survey • Water Management Plan • Pollution Prevention Measures • Restoration **Hydrology and pollution are therefore scoped into the ES.**
ID.6	5.5	**Transport and Access**	NCC highlight that there may be potential significant effects related to transport and access during construction and decommissioning due to the nature of the

ID	Reference in Scoping Report	Issue	Comment
			local highway network. It is noted that the SR suggests standalone technical reports, including a Construction Traffic Management Plan (CTMP), that will be prepared to assess transport impacts, however, NCC raise concerns in regard to the assessment of impacts prior to identifying routes, a construction programme, likely traffic generation profiles, enabling and mitigation measures. NCC consider there to be insufficient information to rule out significant impacts as suggested by the SR. They add that the extent of highway requirements is not known at this stage and should be considered cumulatively to other impacts. NCC state that they would not accept that it can be assumed that highway impacts are insignificant until the TA and CEMP have been completed, and mitigation measures agreed. In terms of HGV movements during construction, NCC suggest that more information will be required regarding prolonged peak activity and more detailed profile of movements to ascertain the true impacts as averages will not demonstrate a true representation. MCC suggest further transport and access related points for consideration in their response in Appendix 1. They include that it would be useful to include contingency planning for adverse weather, road closures or other disruptions common in rural areas within the CTMP. They also suggest what they consider to be the most appropriate primary access routes consideration in their response in Appendix 1. MCC advises the applicant to consider timings of deliveries to avoid peak traffic flows to minimise further congestion of the proposed routes. Detailed analysis of all traffic movements will be required.

ID	Reference in Scoping Report	Issue	Comment
			TCBC agree that transport and access should be scoped in. They state that traffic surveys will be necessary to assess direct, indirect and cumulative impacts upon the existing road networks and cycle paths. TCBC add that traffic assessments should include all routes that were considered and reasons why those routes have been discounted. Both TCBC and NCC require details of vegetation that would be removed to allow vehicles to access the site, TCBC adds that the location of the proposed compound need to be fully justified to demonstrate how their siting have reduced traffic movements. NCC add that other measures needed to provide access routes are not known at this stage but could impact further hedge row, drainage culverts, congestion, public rights of way users etc TCBC include that hours of operation will need to be outlined within the Transport chapter, and that the ES should consider construction and operational phases, along with a draft CEMP that considers matters of dust, noise and smell. The applicant's attention is also drawn to the 'Access options Assessment Report' included in Appendix 1, prepared on behalf of "Protect Candwr and Ponthir Countryside Group" (PCPCG). This assessment should be considered when selecting construction vehicle routes and site access. A number of Interested Parties raise concerns in their responses included in Appendix 1. The Applicant's attention is drawn to these comments in regard to Transport and Access. Their concerns relate to the impact of HGV traffic during construction along country lanes for residents, highway safety and amenity use etc.

ID	Reference in Scoping Report	Issue	Comment
			The applicant's attention is also drawn to comments from K. Jackson which includes concerns related to each of the proposed routes. These comments should be considered during the route selection process **Transport and Access are therefore scoped into the assessment**, due to insufficient information, unless robust justification or evidence of agreement the relevant Local Authorities is included in the ES. Any documents which contain mitigation measures to prevent potential significant effects such as a CTMP or CEMP should be included (even if in draft form) as technical appendices to the ES.
ID.7	5.15	**Air Quality**	There are concerns in regard to impact on Air Quality from HGV deliveries. NCC raises concerns if deliveries are made via the Caerleon Air Quality Management Area (AQMA). CSOG raise concerns regarding the AQMA, claiming that it is a prohibited route, as the road serves an infant's school, primary and secondary schools, amongst other services. TCBC note that the SR does not provide justification for its conclusion that there will be little impact on the Caerleon AQMA. **Air Quality is scoped into the ES during construction and decommissioning phases,** due to the impact of HGV deliveries on nearby sensitive receptors and the potential delivery route passing through the Caerleon Air Quality Management Area.
ID.8	5.16	**Noise and Vibration**	Noise should be addressed in the relevant chapters, however, PEDW agrees that a standalone chapter for Noise and Vibration can be scoped out of the ES. The Applicant should note that this should be addressed in the CEMP.

ID	Reference in Scoping Report	Issue	Comment
			S. Williams raises concerns regarding operational noise emitted from inverters/ transformers and fans as well as pile driving on residential properties, this should be addressed in a proportionate manner in the ES, e.g. with reference to the relevant noise assessment / agreement with Environmental Health Officers.
ID.9	5.17	**Climate**	PEDW agree that Climate can be scoped out as a standalone chapter and addressed in the relevant sections of the ES. TCBC note that the impacts during construction should be assessed in relation to Climate. The applicant may wish to include a carbon balance assessment if they consider the development would have significant benefits in terms of carbon emissions. **Climate is therefore scoped into the ES in a proportionate manner, but not necessarily as a standalone chapter.**
ID.10	5.18	**Cultural Heritage and Archaeology**	NCC comment that they consider there to be significant scope for changes in the setting of Heritage Assets near the site, however, Cadw agree with the approach set out in the SR to address issues relating to Cultural Heritage and Archaeology in separate reports, such as a heritage desk-based assessment, outside of the ES. S. Williams raises concerns in her response in Appendix 1 regarding her Grade II listed property and the potential impact on its stability as a result of pile driving and the impact on the setting of the historic asset. This should be addressed in subsequent heritage assessments. Cadw notes the scheduled monuments listed in their response in Appendix 1, which may have views to and from the proposed solar farm, will be assessed using the methodology outlined in Cadw's guidance 'The Setting of Historic Assets in Wales' (2017). Cadw agrees that the proposed methodology set out in the SR is appropriate.

ID	Reference in Scoping Report	Issue	Comment
			Cadw strongly recommends that the applicant consults Heneb: The Trust for Welsh Archaeology as well as the Local Authorities archaeological advisors, as to the need, extend and form of any additional archaeological evaluations that will be required to be carried out, in regard to the probable enclosure, identified in the geophysical survey. Cadw adds that the probable function and significance of this enclosure will need to be explained, along with the impact of the proposed solar farm on it, when the application for the development is determined. TCBC add that any assessments of impact upon specific heritage assets/landscapes will need to follow ASIDOHL (Assessments of the Significance of the Impact of the Development on the Historic Landscape) methodology. The assessment should also consider the impact upon the Twmbarlwm ancient monument, whilst likely to be low it is a matter to be considered. Given the above views of consultees, PEDW considers it to be premature to scope out Cultural Heritage and Archaeology. This topic is therefore scoped in depending on the results of the relevant assessments and views from Heneb.
ID.11	5.19	**Risk of Major Accidents and Disasters**	The applicant's attention is drawn to the fact that some solar panels are coated in PFAS (Per- and polyfluroalkyl 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. In their response in Appendix 1, CSOG and S. Williams, raises concerns that should be addressed in the ES in terms of Risk and Major accidents. CSOG highlights the presence of a high-pressure gas main running through the site

ID	Reference in Scoping Report	Issue	Comment
			and a large water main crossing the site. PEDW advises the applicant to liaise directly with HSE and Dwr Cymru on this matter. Given these considerations, **Risk of Major Accidents and Disasters is scoped into the ES, although not necessarily as a standalone chapter**.
ID.12	5.20	**Material Assets**	It will be necessary to address Material Assets in a proportionate manner in relevant chapters. **Material Assets is therefore scoped into the ES, although not necessarily as a standalone chapter**.
ID.13	5.21	**Waste**	It will be necessary to address Waste in a proportionate manner in relevant chapters, especially given the decommissioning phase will be addressed in the ES. The CEMP should also be included as a technical appendix to the ES. **Waste is therefore scoped into the ES, although not necessarily as a standalone chapter**.
	Landscape and Visual		
ID.14	6.1.14 – 6.1.44	Methodology	As suggested in the SR, the LVIA should be prepared in accordance with the Guidelines on Landscape and Visual Impact Assessment Third Edition (GLVIA3), NCC highlight that the Applicant should also consider the published Notes and Clarifications on the GLVIA3: https://landscapeinstitute.org/policy-practice/technical/assessments-standards/glvia3-panel/
ID.15	6.1.45 – 6.1.46	Residential Visual Amenity Study and PRoW	TCBC disagree with the approach to scope out a Residential Visual Amenity Study and impact upon Public Rights of Way (PRoW). PEDW agree that these are important aspects that should be considered as these factors should have informed the siting of the proposed development. Furthermore, any PRoW diversion should be fully justified. A number of interested parties that responded to the consultation included concerns related too residential visual amenity. C. Thomas included in his response that the LVIA should include the effect of users of the footpath/lane

ID	Reference in Scoping Report	Issue	Comment
			network for amenity purposes in terms of their physical and mental wellbeing. (amenity benefits of the surrounding countryside). The applicant should liaise with relevant LPAs over the approach to the Residential Visual Amenity Study which should be included in the ES.
ID.16		Viewpoints	The Applicant should liaise directly with LPAs to agree viewpoints. Evidence of these discussions should be included in the ES. The applicant's attention is drawn to CSOG's response in Appendix 1, where they have included an independent Landscape ZTV of the area, which demonstrates concerns regarding the proposed viewpoints. They suggest that the viewpoints proposed in the SR do not include the most sensitive and impacted sites. C. Thomas has also provided the following comments in relation to viewpoints: • Location 9 in Appendix E needs to be divided by about 50yards to fully capture the view northwards and the view eastwards; • to capture the effect on the Candwr Brook valley, an additional viewpoint looking NE from the footpath exit at the rear of Pant-yr-eos farm; and the view in all directions from the middle of Field • Number 13, field gate and scale, needs an additional viewpoint here. F. Bromfield raises concerns regarding impact on the character of the countryside, spoiling views from public rights of ways, and suggests that there should be key viewpoints from Llangybi Hill, the Usk Valley, and public footpaths to the north and east.

ID	Reference in Scoping Report	Issue	Comment
ID.17		Photomontages	TCBC highlight the requirement to show photomontages including landscaping mitigations from base, year 5 and year 10 when landscaping has matured.
	Ecology		
ID.18		Protected Sties	It is noted that TCBC state that the Impact on protected sites should be scoped in including potential impact of hydrological connectivity of the site with the River Usk SAC and the Severn Estuary. However, NRW agree with the reasoning to scope out the River Usk SAC/SSSI as set out in the SR. The applicant suggests that the water quality risks can be managed through appropriate stand-off from watercourses and adoption of standard good practice pollution control measures including a CEMP. PEDW concur with this approach and therefore the River Usk SAC/SSSI can be scoped out. NRW note that the sites/units of the proposed development are located either close to watercourses or on the sloping ground with various steepness and on average within 50m elevation, prone to erosion, sediment run-off and water pollution. NRW advise that a minimum buffer of 8m be left between proposed development and any main river. NRW acknowledge and welcome that a CEMP is proposed for the construction phase of development which we support, however, in addition they consider a Soil Management and Drainage strategy should be also in place for the operational phase of development. Any documents which contain mitigation measures to avoid significant effects should be included as technical appendices to the ES. NRW welcome the intention to scope in potential impacts on the Severn Estuary SPA and Ramsar Site. It is noted that a Habitats Regulations Assessment with regards to the Severn Estuary SPA/Ramsar site is proposed. NRW advise that the HRA should be

ID	Reference in Scoping Report	Issue	Comment
			undertaken in relation to both terrestrial and marine protected sites having regard to both construction and operational stages of the proposed development. The Applicant's attention is drawn to NRW's comments in Appendix 1 regarding Habitat Connectivity and Resilient Ecological Network.
ID.19		Protected Species	NRW advise that should protected species be confirmed, information must be provided identifying the species-specific impacts in the short, medium and long term together with any mitigation and compensation measures proposed to offset the impacts identified. NRW advise comprehensive descriptions of the habitats affected are included to support robust conclusions about their significance for the species. The applicant's attention is drawn to NRWs response in Appendix 1 for further advice regarding descriptions of affected habitats, favourable conservation status, site security of mitigation and compensation. NRW advocate that a conservation plan is prepared for relevant species and included as a technical Appendix to the ES. MCC note that whilst it is agreed that the operational impacts to many of the species associated with the watercourses on site can be scoped out EIA, there is potential for impacts during the construction phase through pollution events, this should be a consideration for the EIA.

ID	Reference in Scoping Report	Issue	Comment
ID.20		Surveys	MCC highlight that where over 24 months have expired since the previous surveys were undertaken, update surveys will be expected to be submitted to inform the application unless sufficient justification can be provided.
ID.21		Local Biodiversity Interests	The Applicant should liaise with the local authorities in regard to Local Biodiversity Interests.
ID.22		Otter	NRW notes that the SR indicates that onsite watercourses and ditches have been assed as being suitable for otter use during the extended habitat survey and that no evidence of otter presence was identified in the surveys. NRW add that the scope of the surveys appears to have been limited. Whilst the SR proposes to scope otter out of the ES, unless results of surveys from September 2025 confirm otter presence, NRW advise that otter should be considered in the context of being an European Protected Species as well as a feature of the River Usk/ Afon Wysg Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). NRW add that existing records show that otters are present in the Afon Lwyd (a tributary of the River Usk), which runs directly adjacent to Parcel 12 of the proposed development land. NRW also include in their comments that additional information is required in regard to the proposed deer-proof fencing as some do not allow for otter passage. NRW further advise that the impact assessment covers all stages of the proposed development on otters, including the potential for elements of the development to block or impede otter movement and subsequently increase road casualties.

ID	Reference in Scoping Report	Issue	Comment
ID.23		Water Vole	NRW notes that the SR states that watercourses and ditches within the site were assessed as having suitability for water vole. No evidence of water vole presence was found; however, NRW advise that the scope of water vole surveys appears to have been limited to an inspection of areas likely to contain crossing points over water courses. Whilst the SR proposes to scope water vole out of the ES unless results of the September 2025 surveys confirm presence, NRW advise that as live sighting of a water vole exists on land directly adjacent to Parcel 8, the proposals have the potential to affect water voles and their habitats and NRW advise that this should be considered as part of any future assessment.
ID.24		Dormouse	NRW notes that surveys found the hedgerows and woodlands within the site to have suitability for dormouse, however, no targeted dormouse surveys appear to be undertaken. The SR suggests that dormouse can be scoped out of the ES due to avoidance and mitigation measures, however, the report also suggests that some sections of hedgerow (potential dormouse habitat) would need to be removed to facilitate the development. It is noted that the quantity and location of dormouse habitat clearance has not been confirmed. MCC add that if alterations to the scheme require the removal of sections of hedgerows it could result in significant delays in order to determine potential impacts to dormice. MCC also note the potential for operational impacts to dormice such as lighting. NRW advise that the proposals, along with breaks in habitat connectivity at hedgerow crossing points, have the potential to affect dormice and should be considered as part of any future assessments. **Dormouse is therefore scoped into the ES.**

ID	Reference in Scoping Report	Issue	Comment
ID.25		Bats	The SR states that there are trees within the site that offer suitable habitat for roosting bats. NRW agree with the approach to scope in foraging and commuting bats for construction and operation. PEDW acknowledges MCCs stance that surveys prior to determination can be scoped out, however, PEDW's stance is that to properly establish the baseline, once it has been identified which potential roosts may be affected, surveys should be undertaken and included as part of the ES at the point of submission. NRW highlight that lighting during construction of the development, as well as lighting at the proposed permanent substation compound, has the potential to impact on bats and their tree roosts. **Therefore, roosting bats should also be scoped into the Environmental Statement.**
ID.26		Ornithology	It is noted that breeding and non-breeding birds are to be scoped into ES. NRW and MCC welcome the approach to breeding birds and advise details of appropriate mitigation, compensation, and enhancements for any likely significant effects identified should be provided along with appropriate enhancements. The applicant's attention is drawn to NRWs comments in Appendix 1 for further detail particularly regarding enhancements for Barn Owl. MCC agree that the non-breeding bird surveys should inform the impact of the operational scheme on Severn Estuary RAMSAR and SPA features. TCBC highlight that the glint and glare assessment should also assess flight path of bats and birds.
	Glint and Glare		
ID.27		Glint and Glare	NCC and PEDW agree with the approach set out in the SR.

ID	Reference in Scoping Report	Issue	Comment
			CSOG highlight the potential impact of glint and glare on helicopters landing at the Grange Hospital. F. Bromfield highlights that seasonal variation and glint/glare implications for nearby dwellings and road users should be considered in the assessment.
	Agricultural Circumstances		
ID.28		Agricultural Land Classification (ALC) and BMV Policy	NCC agree with the approach to assess agricultural impact. LQAS advise that they have previously engaged with the applicant's surveyor to agree the methodology for the ALC survey. LQAS confirm that the areas agreed have been surveyed in detail. The Applicant's attention is drawn to LQAS comments in Appendix 1 regarding compliance with BMV policy. BMC agricultural land is scoped into the assessment.
ID.29		Infrastructure and potential impacts on soil functions	LQAS highlight that 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, depth 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. LQAS add that 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.
ID.30		Soils	LQAS highlight that the proposal is likely to have significant impact upon the important services of mineral, organo-mineral and peat soils and functions and therefore must be assessed.

ID	Reference in Scoping Report	Issue	Comment
			LQAS require a soil management scheme to be prepared by the applicant which is informed by the baseline and considered as part of the ES process. LQAS disagrees with the applicant's statements regarding soil impacts and reversibility of the development at decommissioning as this is not evidenced. Therefore **soils, soil functions and services are scoped into the assessment.**

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 (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62017CN0323) 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 on Habitats Regulations Assessments may prove useful when considering what information to provide to allow the Welsh Ministers to undertake AA: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-habitats-regulations-assessments

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.

In accordance with paragraph 7.6 of Technical advice note (TAN) 15: development, flooding and coastal erosion, applications submitted after 31 March 2025 where planning permission is being sought before SAB approval should be accompanied by a Drainage Statement. Figure 3 of TAN 15 sets out the required contents of a Drainage Statement.

Appendix 1: Consultation Responses

Ask for/*Gofynnwch am* Geraint N. Roberts
Our Ref/*Ein Cyf*
Your Ref/*Eich Cyf* DNS CAS-02366-F2C3K8
Tel/*Ffôn* 01633 656656
Direct Dial/*Rhif Union* [redacted]
DX 99463 Newport (Gwent) 3
E-Mail/*E-Bost* planning@newport.gov.uk

Regeneration and Economic Development

Adfywio a Datblygu Economaidd

NEWPORT CITY COUNCIL
CYNGOR DINAS CASNEWYDD

Civic Centre/*Canolfan Ddinesig*
Newport/*Casnewydd*
South Wales/*De Cymru*
NP20 4UR

Tali Perry
Myfyriwr-Gynllunydd | *Student Planner*
Penderfyniadau Cynllunio ac Amgylchedd Cymru | *Planning and Environment Decisions Wales*
Llywodraeth Cymru | *Welsh Government*

05 November 2025

By email only

Dear Sir / Madam

Ref. No.	DNS CAS-02366-F2C3K8
Description	EIA Scoping Opinion for Candwr Solar DNS Scheme
Site	Land at Court Farm, Ponthir, Monmouthshire

The PEDW Screening decision of 12 June 2025 issued to Pegasus Group for a proposed DNS solar development on land at Court Farm, Ponthir, Monmouthshire concluded the proposed development was EIA development.

In broad terms that Screening decision identified matters considered to have significant environmental impact that would necessitate the submission of an Environmental Statement with any planning application that might be made.

In essence the environmentally significant matters fell under the following categories:

- Landscape & Visual Impact;
- Ecological concerns;
- Glint & Glare assessment;
- Agricultural impact.

The applicant has picked up these matters in terms of their Scoping Report dated 29.09.2025 (SR) submitted as part of this scoping opinion. Section 6.0 of the SR picks up these issues and considers them in greater detail explaining matters to be considered and methodologies.

Landscape & Visual Impact
Chapter 6.1 of the SR promotes a 'standard' approach as advocated in GLVIA3[1] but the advice of *Notes and Clarifications on aspects of the 3rd Edition Guidelines on Landscape and Visual Impact Assessment (GLVIA3)* *LITGN-2024-01* should also be taken into account. The proposed approach is rational and should ensure the issues raised within the Screening Opinion are appropriately addressed.

Ecological concerns
Chapter 6.2 of the SR addresses Ecology and advises an Ecological Impact Assessment will be prepared. The proposed survey methodologies seem sound and suitably informed by information provided by the relevant Local Planning Authorities.

The scoping out of SINCs is rational and it is agreed that woodlands and hedgerows should be scoped in for construction & decommissioning but not for the operational phase. Other scoped in / out elements appear mostly appropriate based on the base line assessments referenced and 3rd party advice. The Council's Ecologist expresses concerns that some issues of concern have been scoped out too early without a sufficiently robust reasoning for that decision and that this undermines EIA principles and is analogous to 'People over Wind'[2] where an appropriate assessment under the Habitat Regulations was judged unsound due to the 'screening out' of potential impacts prior to completing the assessment. As such elements scoped out of the EIA should be carefully justified.

Glint & Glare assessment
There is no reason to disagree with the applicant's assessment and proposed methodology provided in Paragraph 6.3 of the SR.

Agricultural impact
Agricultural impact is assessed at Paragraph 6.4 of the SR. The proposed methodology appears sound.

Scoped out
Scoped out elements are identified at Paragraph 5.0 of the SR.

- Population – agreed.
- Human Health – agreed.
- Ground Conditions & Land – reversibility should be clearly demonstrated, if not reversible then impacts on land are permanent & significant.
- Water Environment – agreed.
- Transport & Access – potentially significant during construction & decommissioning due to the nature of the local highway network.
- Air Quality – potentially a concern if significant deliveries are made via the Caerleon Air Quality Management Area. This elides with the Transport & Access concerns over the suitability of that particular routing.
- Noise & Vibration – agreed.
- Climate – agreed.
- Cultural Heritage & Archaeology – significant scope for changes in the setting of Heritage Assets near the site. This should be assessed.
- Archaeology – agreed.
- Risk of Major Accident & Disaster: agreed but note fire risk if battery storage is proposed.
- Material Assets – agreed.
- Waste – agreed.

Please contact me as necessary.

Yours sincerely

[1] Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA 3).
[2] CURIA - Documents

[redacted]

Geraint N. Roberts

***Prif Swyddog Cynllunio* / Principal Planning Officer**
***Tîm yr Dwyrain* / East Team**
Adfywio a Datblygu Economaidd / Regeneration and Economic Development
***Cyngor Dinas Casnewydd* / Newport City Council**

The following documents were considered as part of this response:

- Environmental Impact Assessment Scoping Report 29 September 2025 (P24-0275)

From: Jackson, Kevin (Traffic Transport & Development Engineer)
<[redacted]>
Sent: 03 November 2025 12:05
To: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>
Subject: DNS CAS-02366-F2C3K8 - Candwr Solar Farm Court Farm PS 25 0083

Good Morning

I am writing in my capacity of Transport Officer representing the Highway Authority for Newport City Council regarding .

DNS CAS-02366-F2C3K8 - Candwr Solar Farm

We have been made aware that the Scoping Study for the Environmental Impact Assessment for the above development suggests that a chapter dedicated to highways and transport is not needed. Whilst we note that the traffic generation is to be assessed by way of a Transport Assessment managed by way of a Construction Management Plan we would question how the impacts of traffic are assessed prior to identifying a route, construction programme, likely traffic generation profiles, enabling measures and mitigation measures.

The Scoping Study states:

"Significant environmental impacts are unlikely to arise from the Proposed Development, and a Transport and Access Chapter is deemed not to be required within the ES."

At this stage we do not believe that the traffic generation or enabling measures have been established sufficiently to be able to state this. The extent of highway requirements is not known at this stage and should be considered cumulatively to other impacts.

An assumed number of HGV movements has been presented with no consideration of where they will be routed and no consideration of how plant and materials are moved from compounds to where they are needed or workforce movements.

Furthermore the average numbers referred to will not be representative of prolonged peak activity and a more detailed profile of movements is needed to ascertain the true impacts. It is likely there will be months of intense HGV activity within the programme. It is not helpful to consider flows averaged over 24 months and a construction programme is needed to understand the true impacts.

Safe access is likely to require the removal of hedge row and the laying of tracks within the site and aprons and other measures to prevent the transfer of deleterious materials from the site by vehicles.

Other measures needed to provide access routes are not known at this stage but could impact further hedge row, drainage culverts, congestion, public rights of way users etc..

There will also be an inevitable impact on the air quality management area, which is already an issue as well as potential impacts adjacent to schools and other sensitive receptors.

Glint and glare can be dealt with without identifying the routes, and can be considered in the Environmental Study at any time.

In conclusion, we would not accept that it can be assumed that highway impacts are insignificant until the TA and CEMP have been completed and mitigation measures agreed. A Transport Chapter would be helpful in summarising the extent of impacts relating to traffic and should follow the production of the TA and CEMP.

Yours Sincerely

Kevin Jackson

Senior Traffic, Transport & Development Officer/Uwch Swyddog Traffig, Trafnidiaeth a Datblygu

Infrastructure

Newport City Council/Cyngor Dinas Casnewydd

Mae’r Cyngor yn croesawu gohebiaeth yn Gymraeg, Saesneg neu yn y ddwy iaith. Byddwn yn cyfathrebu â chi yn ôl eich dewis. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

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Pan fyddwch yn anfon e-bost at Gyngor Dinas Casnewydd, rydych yn cydsynio i’r Cyngor fonitro a darllen unrhyw e-byst o’r fath at ddibenion cydymffurfio â diogelwch ac â deddfwriaeth. I weld yr ymwadiad llawn ewch i http://www.newport.gov.uk/ymwadiad

ECONOMY AND ENVIRONMENT / ECONOMI A'R AMGYLCHEDD
STRATEGIC DIRECTOR / CYFARWYDDWR STRATEGOL
MARK THOMAS

TORFAEN COUNTY BOROUGH | BWRDEISTREF SIROL TORFAEN

SCOPING OPINION

Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017

Application Number:	**25/P/0693/SCOPE**
Development description:	**Scoping opinion for Solar farm**
Location:	**Court Farm, Ponthir**

This scoping opinion has been prepared in respect of the above development by PEGASUS group for up to 46MW Solar Farm and associated development. The request has been submitted in line with Regulation 14(1) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017. This scoping opinion has been considered in light of the information submitted to the Council on 03 October, 2025.

The description of the site and development, as outlined within the submitted Scoping report are considered to meet the requirements or regulation 14.
The Environmental Statement produced in support of any forthcoming application must concentrate on the following areas:

Ecology:
All areas of ecology will need to be scoped in respect of the development. This should include the extent of existing environmental features within and around the site potentially impacted, further protected species' surveys to support the PEA. Whilst the use of eDNA is noted that on its own cannot rule in or out protected species and should be use to support on site surveys. Impact on protected sites should also be scoped including potential impact of hydrological connectivity of the site with the River Usk SAC and the Severn Estuary . Arboricultural assessments if removal of or development within proximity of existing trees is necessary. Where there is a loss of hedgerows this should be replaced within the scheme and sited to ensure the birds and other wildlife have optimal use. The clint and glare assessment should also assess flight path of bats and birds.

Securing Biodiversity Enhancement 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.

LVIA:
The scoping report has considered best practise in line with the Landscape Technical Guidance note, these are supported. However, the report seeks to scope out residential visual amenity study and impact upon public rights of way (PRoW) but in the view of the Torfaen County Borough council, these are important aspects that should be considered as these factors should have informed the siting of the proposed solar farm. Any PRoW diversion should be fully justified and

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outline any diversion are accommodated. The key viewpoints should be discussed with the LPAs to inform the LVIA.
The LVIA should also consider any connections to the grid that is required for the solar farm.
It is also considered that landscaping mitigation should show photomontages from base, year 5 and year 10, as this is when any landscaping should be mature.

Hydrology & Hydrogeology:
The following assessments be scoped into the Environmental Assessment:

- Water Feature Survey
- Water Management Plan
- Pollution Prevention Measures
- Restoration

The scoping report states that various water assessment will be undertaken, and these are supported. However, those need to also inform and consider how during construction and operation that surface water would not affect the water quality that leads to the River Usk and Severn, which given their European designation is important consideration

Traffic, Noise, and Dust & Air Quality:
The above should be scoped into the Environmental Statement including noise and air quality both on the site and along the proposed access routes. Traffic surveys would be necessarily scoped in to assess direct, indirect, and cumulative impacts upon the existing road networks & cycle paths, across both the Torfaen & adjoining boroughs. The submitted scoping report states that there are no AQMA within the site but it is noted that one of the preferred routes is located within an AQMA (Caerleon). The traffic assessment should include all routes that were considered and reasons why those routes have been discounted.
The traffic assessment should have tracking diagrams through out the route, which should show where vegetation (e.g trees & hedgerows) are required to be removed to allow vehicles to access the site. The location of the proposed compound need to be fully justified to demonstrate how their siting have reduced traffic movements.
Hours of operations should be outlined within the Transportation chapter, the ES should consider construction and operational phases, along with a draft CEMP that considers matters of dust, noise and smell. At this stage insufficient information has been provided to demonstrate that these are not a significant impact. However, PEDW may take a different view.

Cultural Heritage:
It is agreed that cultural heritage will need to be scoped into the Environmental Statement to identify any potential impacts nearby Listed Buildings & Scheduled Ancient Monuments. Any assessments of impact upon specific heritage assets/landscapes will need to follow ASIDOHL (Assessments of the Significance of the Impact of the Development on the Historic Landscape) methodology. The assessment should also consider the impact upon the Twmbarlwm ancient monument, whilst likely to be low it is a matter to be considered

Cumulative affects

The scoping report justifies the proposal, in part, with Welsh Water treatment works at Pontir. Given the proposal is linked to the treatment works it is important that the project is defined i.e should it include the operations of the water treatment works and/or the effect positive and negative on the treatment works, if that is defined as part of the project, see case law in *R (Ashchurch Rural Parish Council) v Tewkesbury Borough Council* [2023] EWCA 101 or you may conclude that the project for EIA regulations is the solar farm itself but this just needs be justified in the introduction of the ES.

Climate

The Environmental assessment requires the consideration of significant impacts upon the environment, both positive and negative. The proposal, individually and cumulatively with other development, along with the energy impact upon the waste treatment works could have a significant, positive, effect upon reduced carbon energy from not using fossil fuels.
During the construction phase should assess the carbon footprint of the construction and production of the development.

Scope out

Chapter 5 of the Scoping report seeks to scope out certain topics and provides a justification for their exclusion; these being population, human health, ground conditions and land, water environment, transport and access, air quality, noise and vibration, climate change, and cultural heritage and archaeology. It is agreed that population, and ground conditions and noise and vibration can be excluded from the ES but as the report states will need to be assessed as part of the planning submission. However, matters of water, transport and access and climate change should be considered as part of the ES given the need to consider environmental impacts on European designated sites (water quality) and air. Whilst the report considers the Caerleon AQMA and states that it would have little impact, it does not explain how this conclusion is arrived at. Human Health should be included as the proposal seeks to generation energy to provide for the operation of the treatment works. If the solar farm fails what is the consequence on the treatment works i.e how will they get energy to the site to ensure its operational effectiveness.

Recommendation: Scoping opinion Issued.

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Monmouthshire County Council

Application Number: DM/2025/01286

Proposal: On behalf of Candwr Solar Farm Ltd, we have submitted to Planning and Environment Decisions Wales (PEDW) for consideration an EIA Scoping Request (attached) for the Proposed Development (Candwr Solar Farm) of the installation and operation of ground mounted solar photovoltaic arrays with all associated works, equipment and necessary infrastructure on land at Court Farm, Ponthir, Monmouthshire (reference: DNS CAS-02366-F2C3K8 - Candwr Solar Farm).
A plan sufficient to identify the land
A brief description of the nature and purpose of the development including its location and technical capacity
Its likely significant effects on the environment
A statement that the request is made in relation to a development of national significance for the purposes of section 62D of the 1990 Act
And such other information or representations as the person making the request may wish to provide or make

Address: Candwr Solar Farm Ponthir Monmouthshire NP18 1HU

Applicant: Hannah Tidd

Plans:

RECOMMENDATION: Closed

Case Officer: Ms Kate Young
Date Valid: 03.10.2025

2.0 RELEVANT PLANNING HISTORY (if any)

Reference Number	Description	Decision	Decision Date

DM/2025/01286	On behalf of Candwr Solar Farm Ltd, we have submitted to Planning and Environment Decisions Wales (PEDW) for consideration an EIA Scoping Request (attached) for the Proposed Development (Candwr Solar Farm) of the installation and operation of ground mounted solar photovoltaic arrays with all associated works, equipment and necessary infrastructure on land at Court Farm, Ponthir, Monmouthshire (reference: DNS CAS-02366-F2C3K8 - Candwr Solar Farm). A plan sufficient to identify the land A brief description of the nature and purpose of the development including its location and technical capacity Its likely significant effects on the environment A statement that the request is made in relation to a development of national significance for the purposes of section 62D of the 1990 Act And such other information or representations as the person making the request may wish to provide or make	Pending Determination	
DC/1990/00030	Conversion Of Redundant Barn Into Dwelling.	Approved	26.04.1990
DC/2007/00665	Retention of wind turbine.	Approved	11.07.2007
DC/1978/00127	Alteration And Extension	Approved	03.07.1985
DC/1977/00511	Alterations And First Floor Dormer Extension	Approved	03.07.1985
DC/2008/00030	Construction of a water filtration building, water storage reservoir, internal site access road and ancillary process plant.	Approved	01.05.2008

3.0 LOCAL DEVELOPMENT PLAN POLICIES

Strategic Policies

Development Management Policies

- EIA Scoping Notification and Consultation

Candwr Solar Farm on Land at Court Farm, Ponthir, Monmouthshire. Environmental Impact Assessment (EIA) Scoping Report

The Environmental Impact Assessment (EIA) Scoping Report has been prepared on behalf of Candwr Solar Farm Limited (the Applicant) in respect of a proposal on land at Court Farm, Ponthir, Monmouthshire (the Application Site or Site), which is proposed for an installation and operation of ground mounted solar photovoltaic arrays with all associated works, equipment and necessary infrastructure (the "Proposed Development").
By virtue of its potential generating capacity of between 10MW-350MW, this Proposed Development constitutes a Development of National Significance (DNS) under section 4 of the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016 , for the purposes of section 62 (D) of the Planning (Wales) Act 2015
.

LANDSCAPE / GREEN INFRASTRUCURE

With regards to the EIA Scoping Report the landscape looks comprehensive and reasonable in addressing the key issues that will need to be evidenced
in the ES and the LVIA

FLOOD RISK AND SAB
Flood Risk - The site is crossed by small watercourses however paragraph 5.4.2 of Pegasus' EIA Scoping Report (29/09/2025) recommends no built form will be proposed within Flood Zones 2 or 3 and that a 7m buffer has been included in the site design. This is acceptable mitigation from a flood risk perspective. Any SuDS attenuation or infiltrating features should not be built within flood zones unless the individual features are designed to receive the additional flow from the catchment.

SAB - We have already engaged with the applicant to inform their ground investigation which will determine much of the layout and nature of the SuDS. We have also approved SAB/2025/025 which was a Sustainable Drainage System serving the Great House Solar Farm also undertaken by Pegasus. Any SAB application should seek to be consistent with that already approved and to prioritise surface features over buried pipework. A SuDS will be required on all new construction areas. As the development is cross border, separate SAB applications will be required with each SAB. These should be consistent with each other. Achieving a finished SAB layout should be prioritised in order to ensure that changes to the site layout do not impact conditions upheld by other consultees.

Given that appropriate mitigations have already been identified within Pegasus' EIA Scoping Report (29/09/2025) I do not believe that an Environmental Impact Assessment is required to address Flood Risk or SAB perspectives. Development will be appropriately positioned away from flood risk areas, and the SAB application will be dealt with separately to the DNS application.

BIODIVERSITY

The application pertains to the construction of a solar PV scheme at Court Farm, Ponthir. The site has an area of approximately 118.8 hectares and is illustrated in Appendix A of the Scoping report. The site location encompasses across county council boundaries and includes areas within the scope of Monmouthshire County Council, Torfaen County Council and Newport

County Council. Previous discussions with Avian Ecology were undertaken in July 2025, alongside ecologists from the relevant authorities, to determine the proposed survey approach.
Sections 6.2. of the Scoping Report detail the approach to the ecological and ornithological aspects of the scheme respectively.
Ornithology
A number of ornithology surveys have been undertaken to date:
Breeding Bird Surveys
Non-breeding Bird Surveys (ongoing)
Surveys have been undertaken over 2025. The Breeding bird survey recorded an assemblage of species considered likely to be of value at local level. With the majority of trees and hedgerows to be retained, it is considered that ground nesting species, such as skylark, will most be at risk of displacement as a result of the scheme and therefore breeding birds have been scoped into the EIA.
The non-breeding bird surveys are ongoing and therefore have been scoped into the EIA.
The non-breeding bird surveys should inform the impact of the operational scheme on Severn Estuary RAMSAR and SPA features. Whilst it is not specified within Table 1.12, it is assumed that the scoped in Statutory Designated Sites (with mobile qualifying criteria) located up to 10km from the Site on the basis of the reference to 'qualifying mobile species.'
It is agreed that the above should all be scoped-in to the final Environmental Statement.
Given that the ornithological assessments are not currently available to review, it is not possible to comment on the acceptability of the likely mitigation and enhancement measures detailed within the scoping report.
Ecology
Section 6.2.45. confirms that a number of ecology surveys have been undertaken to date:
UKHabitat Classification Survey
Great Crested Newt HSI and eDNA Surveys
Bat Activity Surveys
Riparian Mammal Survey
Badger Survey
Additionally the following surveys will also be undertaken in Autumn 2025:
CHEGD fungi eDNA surveys
The surveys undertaken mean that impacts to both badger and great crested newt have been scoped out due to the lack of evidence of their presence on site.
Surveys for roosting bats in trees were scoped out on the basis that impacts on mature trees as a result of the proposals will be mostly avoided and any earmarked for removal can be surveyed pre-construction. It was advised during the meeting with the scheme ecologists in July that identifying roost features earlier than pre-construction will reduce the likelihood of project delays. However, it is agreed that as long as this is acknowledged, surveys prior to determination can be scoped out.
Surveys for hazel dormice have been scoped out on the basis that hedgerows across the site will be mostly retained. Whilst this approach is considered acceptable, should alterations to the scheme require the removal of sections of hedgerows it could result in significant delays in order to determine potential impacts to dormice.
Surveys for reptiles, migratory fish, white-clawed crayfish and European eel were scoped out on the basis that presence is assumed and impacts to such species were to be negated through embedded mitigation. Given that presence is assumed and mitigation will be adopted where deemed appropriate, this is considered an acceptable approach.
Where over 24 months have expired since the previous surveys were undertaken, update surveys will be expected to be submitted to inform the application unless sufficient justification can be provided.
Table 1.11 of the report details elements of the scheme that have been scoped in or out of the EIA. Operational impact to bats and dormice have been scoped out, although there could be potential for lighting to impact upon both species if it is not located appropriately and mitigation is not implemented. Furthermore, whilst it is agreed that the operational impacts to many of the species associated with the watercourses on site can be scoped out EIA, there is potential for impacts during the construction phase through pollution events. Therefore, it is advised that these components are scoped into the EIA.
As above, given that the ecological assessments are not currently available to review, it is not possible to comment on the acceptability of the likely mitigation and enhancement measures

detailed within the scoping report.

HIGHWAYS

I have reviewed the Environmental Impact Assessment Scoping Directive submitted by the applicant particularly Section 5.5. Transport and Access.
The section is an overview of the transport and access considerations and demonstrates the logistical challenges and mitigation measures for the development of the Solar Farm.
The following is noted.
Primary access routes include:
A4042 □$ B4236 □$ Candwr Road □$ Unnamed Roads
B4596 □$ B4236 □$ Candwr Road □$ Unnamed Roads
These routes are considered the most appropriate, the applicant has been made aware that the routes are via roads that are under the jurisdiction of the 3 highway authorities, Newport City Council, Torfaen County Borough Council and Monmouthshire County Council.
A less direct northern route via Usk (A449, A472) is also under consideration.
The applicant has been informed them that the proposed route is not considered appropriate particular the local network from the A472 is appropriate for the size and number of vehicles expected.
Construction Traffic:
Deliveries will be made by HGVs, with the largest being 16.5m articulated vehicles.
Materials will be decanted at two main compounds and distributed internally via smaller vehicles (e.g., tractor and trailer).
Estimated peak traffic: ~30 HGV movements/day (15 in, 15 out), which is considered low and manageable.
The use of smaller vehicles (e.g., tractors and trailers) for internal site distribution is a practical approach that reflects sensitivity to local road constraints.
The applicant has been advised to consider the timing of deliveries to avoid peak traffic flows to minimise further congestion of the proposed routes.
Detailed analysis of all traffic movements will be required.

Traffic Management:

Temporary impacts expected during the ~24-month construction phase.
Measures include:
Escort vehicles
Banksmen at access points
Temporary signals
Delivery timetables
Existing agricultural accesses will be upgraded where possible; new access points may be created.
The proposals are considered proactive
CTMP (Construction Traffic Management Plan):
A CTMP is required to support an application.
It would be useful to clarify whether it will include contingency planning for adverse weather, road closures, or other disruptions common in rural areas.
The applicant has held pre-application meetings with the 3 affected highway authorities and is looking to arrange a joint meeting to discuss and develop the proposed developments access strategy and CTMP.
The rationale for excluding a transport assessment is noted, however it is felt prudent to include a brief summary within the ES to demonstrate that transport impacts have been considered and addressed through standalone reports.
Points for Consideration
Access Points
Further detail on how safety will be maintained at these access will be required
Visibility Splays
Swept Path Analysis:

Swept path analysis for the HGVs will be required to confirm suitability of the proposed routes and access points.

Traffic Volume Estimates:
The estimate of 30 HGV movements per day during peak construction is noted, it is felt necessary to include all construction traffic including materials, plant and construction staff and by range or breakdown by vehicle type to better inform traffic impact assessments.

Conclusion
It is acknowledged that the development will have a significant impact on the local environment, the immediate local highway network and the applicant considers that the significant impact will occur during the construction phase which is expected to last 24 months (max). No significant impact is anticipated during the operational phase.
The rationale for excluding a transport assessment is noted, however it is felt prudent to include a brief summary within the ES to demonstrate that transport impacts have been considered and addressed through standalone reports

Environmental Health

There will be aspects of nuisance (noise/ light/ dust) during the construction phase (and decommissioning phase which is assumed to be the same as the construction phase), which will be controlled by the Construction Environmental Management Plan (CEMP). Noise from solar farms once operating comes predominantly from transformers and inverters (specifically cooling fans). Tonal noise also has the potential to result in complaints.

A BS 4142 noise impact assessment has been scoped out but it will form part of the application and a CEMP as part of a planning condition. Providing we are consulted on the full BS 4142 report then it doesn't necessarily matter when it comes in. The same goes for the CEMP document.

Glint & Glare Assessments (GGA) . I have spoken to other EH colleagues in a neighbouring authority who've dealt with recent solar farm applications and they have only assessed impact of nuisance and because it's not classed as artificial light it wouldn't fall within our remit to assess under our statutory nuisance provisions.

The scoping report does scope in a GGA. The assessment pertains to the potential impact upon road safety, residential amenity, railway infrastructure and operations, and aviation activity associated with surrounding airfields. So once the report comes in, considerations for Highways impact, Civil Aviation Authority given Cardiff/Bristol Airports, maybe MoD given proximity to Caerwent training area? and Network rail if any potential impacts on rail?

In relation to impact on residential amenity, there doesn't appear to be any CIEH or UKHSA/PHW guidance that can support an EH response in relation to the impact to Public Health.

Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-289727-S1P7
Eich cyf/Your ref: DNS CAS-02366-F2C3K8

PEDW
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Dyddiad/Date: 07 November 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

Potential DNS Application: Candwr Solar Farm Site

BWRIAD/PROPOSAL: Installation and operation of ground mounted solar photovoltaic arrays with all associated works, equipment and necessary infrastructure

LLEOLIAD/LOCATION: Land at Court Farm, Ponthir, Monmouthshire Proposed Development

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 03 October 2025.

We note you seek our advice on the scope of the EIA and the proposed methodologies outlined in the Environmental Impact Assessment Scoping Report, prepared by Pegasus Group dated 29/09/2025 (ref: P24-2075).

We note the following topic relevant to NRW have been scoped in to the Environmental Statement to be prepared for the proposed development.

- Biodiversity- covered by chapter 6 ‘ecology’ of the ES.

We concur with this topic being scoped in but note certain aspects of biodiversity/ecology are proposed to be scoped out (otter, water vole, dormouse and roosting bats)..As surveys in relation to these species have not been submitted, we are unable to agree that these matters should be scoped out. We offer advice on ecological matters under the following headings.

- European and Fully Protected Species under the Wildlife and Countryside Act 1981 as Amended (excluding birds)
- Ornithology – Schedule 1 birds
- Protected Sites (terrestrial and marine)

General

The EIA for this development should include sufficient information to enable the determination of the extent of any environmental impacts arising from the proposed scheme on legally protected species, including 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/ post-operational phases and impacts on long-term site security of the nature conservation resource.

Within the EIA, 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
- Biosecurity
- Decommissioning

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 EIA such as biodiversity.

The EIA 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.

European and Fully Protected Species (excluding birds)

Surveys

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 EIA.

We note that on-site surveys to date include (but are not limited to) great crested newt (GCN) habitat suitability assessments and eDNA June 2023 and June 2025; seasonal bat activity May-September 2025; water vole and otter (scope limited to "*crossing points and watercourse extents which are hydrologically connected to Sites of Importance for Nature Conservation*") June-Sept 2025, and badger in 2025. The survey information has not been submitted in support of the Scoping consultation.

Otter

The Scoping Report indicates that on-site watercourses (Candwr Brook and its tributaries) as well as ditches within the site were assessed as being suitable for otter use during the extended habitat survey. No evidence of otter was identified during the surveys; however, the scope of survey appears to have been limited (please see above).

The scoping report notes that additional targeted surveys were undertaken in September 2025. It is our understanding from the information provided that the results of these surveys were not available at the time of scoping report submission. Section 6.2.123. of the report states that "*Otter are provisionally scoped out of the ES. Should additional targeted surveys in September 2025 confirm otter presence, and impacts are anticipated as a result of watercourse crossings, the species would then be scoped into the assessment*."

The otter is a designated feature of the River Usk/ Afon Wysg Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), which is located circa 1.4 kilometres to the south-east of the proposed development site boundary. Due to the proximity of the SAC, we advise that otter are considered in the context of being a European Protected Species (EPS) as well as a designated SAC feature, and the proposal is considered under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) (Habitat Regulations Assessment).

Existing records show that otters are present in the Afon Lwyd (a tributary of the River Usk), which runs directly adjacent to Parcel 12 of the proposed development land. In addition, as noted above, habitat suitable for otters is present within the development site.

The scoping report indicates that the parcels of solar arrays are proposed to be enclosed using deer-proof perimeter fencing, with "*a small gap at the bottom to allow passage for small animals*". Different types of deer-proof fencing exist, some of which do not allow for otter passage. No information is given on the size or location of the gaps underneath the fencing.

We advise that the impact assessment covers all stages of the proposed development on otters, including the potential for elements of the development to block or impede otter movement and subsequently increase road casualties.

Water Vole

The scoping report notes that watercourses and ditches within the site were assessed as having suitability for water vole. No evidence of water vole presence was found; however, the scope of water vole surveys appears to have been limited to an inspection of areas likely to contain crossing points over water courses.

As with otters, the scoping report notes that "*Water voles are provisionally scoped out of the ES. Should additional targeted surveys in September 2025 confirm water vole presence, and impacts are anticipated as a result of watercourse crossings, the species would then be scoped into the assessment*."

A record of a live sighting of a water vole exists on land directly adjacent to Parcel 8. As the proposals have the potential to affect water voles and their habitats, we advise that this should be considered as part of any future assessment

Dormouse

Extended habitat survey found that hedgerows and woodlands within the site have suitability for dormouse. No targeted dormouse surveys appear to have been undertaken.

The scoping report suggests that due to embedded avoidance and mitigation measures such as buffers around field boundary habitats, dormice can be scoped out of further assessment. However, the report indicates that some dormouse habitat (sections of hedgerow) would need to be removed to facilitate development. We note that at this stage, the quantity or location of dormouse habitat clearance has not been confirmed.

In addition, the proposals include a permanent substation compound requiring lighting. These proposals, along with breaks in habitat connectivity at hedgerow crossing points, have the potential to affect dormice and should be considered as part of any future assessments..

Bats

The Scoping Report states that "*several trees within the Site offer features suitable for roosting bats*." Although no trees are proposed to be removed to facilitate development,

lighting during construction of the development, as well as lighting at the proposed permanent substation compound, has the potential to impact on bats and their tree roosts. We advise roosting bats are scoped in to the Environmental Statement.

We are content that foraging and commuting bats have been scoped in for both construction and operation impacts.

Impact Assessment

Should protected species be confirmed, information must be provided identifying the species-specific impacts 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.

We advise that Environmental Impact Assessment (EIA) 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 at all appropriate spatial scales. The EIA 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.

Where proposals implicate protected species, which are also notified features of designated sites (e.g. SAC, SSSI), we advise that the EIA considers the impacts on those species from both perspectives.

We advise that the EIA 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 Environmental Statement.

European Protected Species 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 EIA 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).

Where a European Protected Species is present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

(a) It satisfies an appropriate derogation or licencing purposes, which in the case of development is most likely to be preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment;
(b) There is no satisfactory alternative and
(c) The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

These requirements are also translated into planning policy through Planning Policy Wales (PPW) February 2021, 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 EIA where a European Protected Species is present.

Local Biodiversity Interests

We advise you consult 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 those 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).

We advise that where EPS and/ or nationally fully protected species are present, the development maintains habitat connectivity across the development site.

Ornithology – Schedule 1 birds

We note breeding and non-breeding birds are to be scoped in to ES. We welcome the approach to breeding birds on site and advise details of appropriate mitigation, compensation, and enhancements (following the step-wise approach outlined in PPW12) for any likely significant effects identified should be provided along with appropriate enhancements. In some instances, mitigation may need to take the form of curtailment or redirection of activities during particular times of year. Where buffer distances are required or need to be considered then reference should be made to Goodship & Furness 2022 or alternative published references for species not listed within Goodship & Furness 2022.

We advise solar farms can provide good habitat for barn owls if managed correctly (for example see Ground-mounted solar panels and Barn Owls - The Barn Owl Trust). As Planning Policy Wales requires that development provides a Net Benefit for Biodiversity (NBB) we recommend that enhancement aimed at promoting barn owls on site is brought forward. This should include how appropriate habitat will be created, retained, and managed for the lifetime of the scheme, as well as the provision of suitable nest boxes.

Protected sites (terrestrial): River Usk SAC and SSSI

We note it is proposed to:

- scope out statutory designated sites (within 2km of the site) and statutory designated sites (without mobile qualifying criteria) located greater than 2km from the site.
- scope in statutory designated sites (with mobile qualifying criteria) located up to 10km from the site

From this we understand that the River Usk SAC and SSSI are proposed to be scoped out, as well as designated feature species such as otter, fish and crayfish. We consider the risk to the SAC/SSSI will be during the construction phase as the site is hydrologically linked via several watercourses. The scoping report states in relation to the River Usk SAC/SSSI:

'*Whilst there is a risk to the SAC through changes in water quality, it is anticipated that this can be managed through appropriate stand-off from watercourses and adoption of standard good practice pollution control measures, including a Construction Environmental Management Plan (CEMP).*' We concur with this and the River Usk SAC/SSSI being scoped out.

Unit 12 is the closest part of the proposed development site the River Usk SAC and SSSI. It is situated adjacent to the confluence between Candwr Brook and Afon Lwyd (the latter a main river). Other proposed development units are also adjacent to/traversed by Candwr Brook, Sirhowy Brook and other unnamed watercourses, connected to the Afon Lwyd and eventually the River Usk. The sites/units of the proposed development are located either close to watercourses or on the sloping ground with various steepness and on average within 50m elevation, prone to erosion, sediment run-off and water pollution. We advise that a minimum buffer of 8m be left between proposed development and any main river. Please see flood risk advice below.

We acknowledge and welcome that a CEMP is proposed for the construction phase of development which we support, however, in addition we consider a Soil Management and Drainage strategy should be also in place for the operational phase of development.

Protected sites (marine): Severn Estuary Special Protection Area (SPA) and Ramsar Site

We note the following statements within the Scoping document:

6.2.62 A non-breeding (wintering) bird survey was undertaken in early 2025 with two survey visits per month in January, February and March. The surveys encompassed the array areas and land up to 600m, where accessible. Additional survey visits are planned between September and December 2025.

6.2.93 The Severn Estuary SPA/Ramsar site is located approximately 8.5km from the Site. Whilst no qualifying species of the designated sites have been recorded during the non-breeding bird surveys to date, these surveys do not cover a full season and therefore as a

precaution impacts on the SPA/Ramsar site are ***scoped in*** *to the ES. A Habitat Regulations Assessment will be undertaken.*

Given the wintering bird survey has not yet been completed, we welcome the intention to scope in potential impacts on the Severn Estuary SPA and Ramsar Site.

Habitats Regulations Assessment

We note the intention to undertake a Habitats Regulations Assessment with regard to the Severn Estuary SPA/Ramsar site. We advise the HRA should be undertaken in relation to both terrestrial and marine protected sites having regard to both construction and operational stages of the proposed development.

We note the following topics relevant to NRW have been scoped out of the Environmental Statement to be prepared for the proposed development and provide further advice.

- Land
- Water

Land

We note the scoping documents states 'The Site comprises agricultural land and has no known history of contamination onsite.' As such we concur that this topic may be scoped out.

For information, we advise that high voltage fluid filled cables have the potential to result in contamination/pollution of groundwater if the fluid is a hazardous substance and leaks into the ground. As such the proposed type of cables to be used should be clarified as part of any planning application submitted. We refer you/the applicant to The Approach to Groundwater Protection (issued by EA and adopted by NRW, 2018), position statement C5 (Pipelines and high voltage fluid filled cables) for further information.

Water

The majority of the Site is located within Flood Zone 1 for Rivers according to the Flood Map for Planning for Rivers by Natural Resource Wales and therefore has a low probability of flooding from rivers (less than 1 in 1,000 year). A small area of parcels 5, 6, 7, 9 and 12 are located within Flood Zone 2 and 3 which lies adjacent to the Candwr Brook and River Lwyd Main Rivers. We note that a Flood Consequence Assessment (FCA) will be undertaken and will include mitigation measures (where necessary). We note from 5.4.2. of the scoping document that no built development is proposed within Flood Zone 2 or 3 for rivers or surface water and small watercourses and an appropriate buffer to the top of the bank of the watercourses will be applied to all watercourses onsite to ensure continued access for maintenance.

Section 5.4.5. states *'Similarly, there are no significant sources of pollution in an operational solar farm,….A Construction Environmental Management Plan (CEMP) would be used to avoid pollution of local water resources'.*

5.4.6. Likely significant effects from the Proposed Development on groundwater or surface water interruption affecting local abstractions are not anticipated.

Having regard to the above, we concur that this topic may be scoped out and dealt with via the submission of a flood consequences assessment as part of any planning permission submitted and the preparation of a construction environmental management plan.

For information, we advise that the flood map is generalised at this location and not based on available flood data. In addition, the applicant should note that if development works are within 8 metres of the river, they may need to apply for a Flood Risk Activity Permit.

With regard to advice on surface water, we refer you to the Lead Local Flood Authority.

Other Matters

Habitat connectivity and Resilient Ecological Network (REN)

We also advise that the value of the proposed development units/ sites in terms of connectivity of habitats is considered and how the development of a site is likely to affect habitat connectivity in the wider landscape. RENs deliver the requirements of Policy 9 Welsh Government's Natural Resource Policy by identifying and safeguarding resilient ecological networks (REN). Impact should be considered as the proposed development covers over 123ha. We refer you/the applicant to:
Natural Resources Wales / Practitioners' guide to Resilient Ecological Networks
Terrestrial and freshwater Resilient Ecological Networks: a guide for practitioners in Wales

RENs identify networks of habitat which link protected sites and other biodiversity priority hotspots across the wider landscape. They secure the provision of a range of important ecosystem services, that people receive from nature and healthy ecosystems such as food, cultural heritage, climate regulation and water purification. Protected sites are vulnerable to a range of pressures and demands, and without functional connectivity the permeability of biodiversity within protected sites to move across the landscape is reduced. This results in a decline in ecosystem resilience. A major issue affecting ecosystem functioning is loss and fragmentation of natural habitats. This fragmentation can impact a range of ecosystem services including air quality, water quality and carbon capture.

REN maps are made up of Core Zones (including protected sites such as SSSIs) and Nature Recovery Zones (opportunity areas connecting core zones and or strengthening their resilience). These Core and Recovery Zones mapped together form an applied opportunity map to assist in working towards securing resilient ecological networks. The maintenance, enhancement and re-creation of RENs are therefore vital for nature recovery.

A number of the proposed units/sites sit within the core REN components and therefore can potentially affect the ecosystem resilience.

Non-statutory designated sites, such as SINCs, are also part of core areas/component of REN and contribute to resilience of River Usk SAC, SSSI. We would expect these to be considered in the ecological assessment for/by the LPA.

Other Advice

The advice in this letter relates to matters which are included on our consultation topics list. We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

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,

Annabelle Evans
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.

Cadw

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Planning and Environment Decisions Wales Sent by email	Eich cyfeirnod Your reference	**DNS CAS-02366-F2C3K8**
	Ein cyfeirnod Our reference	
	Dyddiad Date	29 October 2025
	Llinell uniongyrchol Direct line	[redacted]
	Ebost Email:	Cadwplanning@gov.wales

Dear Sir / Madam,

EIA scoping Consultation - Candwr Solar Farm
LOCATION: Land at Court Farm, Ponthir, Monmouthshire
REF: DNS CAS-02366-F2C3K8

Thank you for your letter of 3 October 2025 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.

<u>Advice</u>

This advice is given in response to scoping opinion as to the contents of an Environmental Impact Assessment (EIA) that will be submitted in support of an application for the Candwr Solar Farm at Court Farm Ponthir.

The request for a scoping opinion is accompanied by a scoping report prepared by Pegasus Group. Section 5.18 of this report, outlines the assessment of the impact of the proposed solar farm on the Cultural Heritage and Archaeology and concludes that it can be "scoped out" of the formal environmental statement, but that issues relating to this subject will be considered in separate reports (including a heritage desk-based assessment and a report on a geophysical survey, that has already been carried out in the application area) which will be submitted with the application. We do not disagree with this conclusion.

The scoping report also outlines the methodologies that will be used to assess the impact of the solar farm in the heritage desk-based assessment. An initial assessment has already identified the designated historic assets listed on Annex A as being located inside 3km of the proposed development, but that in most cases intervening topography, buildings and vegetation block all views between them and therefore, the proposed development will have no impact on the settings of these designated historic assets: However, this assessment has identified that scheduled monuments MM011 Penrhos Camp (civil war earthworks); MM135 Candwr Camp and listed buildings LB2674 Little Creiggydd; LB3141 Glanshirhowy Farm and LB26129 Barn at Pen-Teyn Farm may have views to and from the proposed solar farm and that its potential impact on their settings will be assessed using the methodology outlined in "The Setting of Historic Assets in Wales". We concur that the impact of the proposed solar farm on the settings of these designated historic assets requires full assessment and that the proposed methodology is appropriate

Section 5.18.17 of the scoping report explains that the geophysical survey has identified a probable enclosure, located towards the centre of the proposed development area. The probable function and significance of this enclosure will need to be explained, along with the impact of the proposed solar farm on it, when the application for the development is determined. If insufficient information is available than an archaeological evaluation of this feature may be required. The applicant is therefore strongly recommended to consult Heneb: The Trust for Welsh Archaeology, the archaeological advisors to Newport City Council and Torfaen County Borough Council, as to the need, extent and form of any additional archaeological evaluations that will be required to be carried out to produce the required information. The applicant's attention is drawn to section 6.1.26 of Planning Policy Wales that requires the results of any archaeological evaluation to be presented with the planning application.

Yours sincerely

Nichola Smith
Historic Environment Inspectorate / Arolygiaeth yr Amgylchedd Hanesyddol

Annex A

Designated Historic Assets

Scheduled Monuments
MM011 Penrhos Camp (civil war earthworks)
MM014 Caerleon Castle Mound
MM023 Lodge Wood Camp
MM037 Medieval Tower at Hanbury Arms
MM049 Priory Wood Camp
MM079 Cae Camp
MM087 Castle Mound E of Graig Wood
MM135 Candwr Camp
MM136 Churchyard Cross
MM137 Llantarnam Abbey Tithe Barn
MM176 Great Bulmore Roman settlement
MM230 Caerleon Legionary Fortress
MM231 Caerleon Civil Settlement
MM232 Caerleon Roman Amphitheatre
MM233 Caerleon Legionary Fortress: Goldcroft Common
MM234 Caerleon Legionary Fortress: School Fields
MM235 Caerleon Legionary Fortress: Grounds of St Cadoc's Home
MM236 Caerleon Legionary Fortress: Area between Priory Hotel and Priory Lodge
MM237 Caerleon Legionary Fortress: Field SE of Broadway
MM238 Caerleon Legionary Fortress: Grounds of Museum
MM239 Caerleon Legionary Fortress: Back Garden of No 4 Museum Street
MM240 Caerleon Legionary Fortress: Area behind Caerleon House
MM241 Caerleon Legionary Fortress: Town Hall Park, High Street
MM242 Caerleon Legionary Fortress: Area of Myrtle Cottage Barracks
MM243 Caerleon Legionary Fortress: Area off White Hart Lane
MM244 Caerleon Civil Settlement: Site of Roman Building SE of Castle Street
MM245 Caerleon Legionary Fortress: Grounds of Health Clinic
MM246 Caerleon Legionary Fortress: Grounds of the Croft Nursing Home
MM247 Caerleon Legionary Fortress: Old Vicarage Garden
MM248 Caerleon Legionary Fortress: Former Garden of The Firs
MM252 Caerleon Legionary Fortress: Car Park and Garden of Endowed School, North of Broadway
MM254 Caerleon Civil Settlement: Area under Broadway Playing Fields
MM262 Caerleon Legionary Fortress: Former Ambulance Station Field

Registered Parks and Gardens
PGW(Gt)20(NPT) Bryn Glas
PGW(Gt)25(TOR) Llantarnam Abbey
PGW(Gt)36(MON) Glen Usk

Listed Buildings:

2658	Lower Cefn Carnau	II
2660	Celynen	II
2661	Cefn Tila Bach	II
2664	Craigwith House	II

2665	Court Perrot Farmhouse	II
2666	Croeswen Farmhouse	II
2668	Cwrt Bleddyn	II
2670	Former Church of St David	II
2671	Tombstone of Margret Morgan at Church of St David	II
2672	Tombstone of John Phillip to south west of the Church of St David	II
2674	Little Creiggydd	II
2676	Llanddewi Court	II*
2677	Oxhouse at Llanddewi Court	II
2678	Barn at Llanddewi Court	II
2679	Lansor	II
2684	Pen-y-parc Farmhouse	II
2685	Church of St Tegfedd	II
2686	Ton Farmhouse	II*
2691	Berllan-deg	II*
2692	Cefn Henllan Farmhouse	II
2693	Dovecote to east of Cefn Henllan Farmhouse	II
2694	Coed-y-fon Farmhouse, including attached Granary and Cartshed	II
2696	Garn Fawr (or Upper Garn)	II
2697	Glen Usk	II*
2698	Temple at Glen Usk	II
2699	Gate piers to road, NE of Glen Usk	II
2701	Combination Farmbuilding to north of Great House	II
2702	Church of St. John the Baptist	II
2703	Llansor Fawr (Great Llansor)	II
2841	Telephone Call-box on east side of road close to Old Mackworth Arms	II
2947	Garden Wall of The Mynde	II
2948	Church of St. Cadoc	II*
2949	Lamppost in Churchyard of the Church of St Cadoc	II
2950	,5,Backhall Street,Caerleon,Newport,GWENT,	II
2951	,6&7,Backhall Street,Caerleon,Newport,GWENT,	II
2955	The Hall	II
2956	Garden Railings and Gate to The Hall	II
2957	,27,Backhall Street,Caerleon,Newport,GWENT,	II
2958	The Red Lion PH	II
2960	King's House	II
2961	,1,Cross Street,Caerleon,Newport,GWENT,	II
2962	,2,Cross Street,Caerleon,Newport,GWENT,	II
2963	,3,Cross Street,Caerleon,Newport,GWENT,	II
2965	,20&21,Cross Street,Caerleon,Newport,GWENT,	II
2966	The Firs with attached railings	II
2967	The Olde Bull Inn PH	II
2968	,9,High Street,Caerleon,Newport,GWENT,	II
2969	,10,High Street,Caerleon,Newport,GWENT,	II
2970	,15,High Street,Caerleon,Newport,GWENT,	II
2971	Porth-y-mynde, wall and entrance gates of Caer Cottage	II
2972	,23,High Street,Caerleon,Newport,GWENT,	II

2973	,24,High Street,Caerleon,Newport,GWENT,	II
2975	,27,High Street,Caerleon,Newport,GWENT,	II
2976	,29,High Street,Caerleon,Newport,GWENT,	II
2977	No 30 including attached railings	II
2978	The Post Office	II
2979	No 32 including attached railings	II
2980	,33,High Street,Caerleon,Newport,GWENT,	II
2981	The Priory Hotel	II
2982	Boundary Wall between The Priory Hotel and No 35	II
2983	Priory House	II
2984	The Endowed School	II*
2989	,98,Mill Street,Caerleon,Newport,GWENT,	II
2990	Ashlar Doric portico at The Roman Legionary Museum	II
2991	The Old Toll House	II
2992	White Lion House	II
2993	Isca Grange, including attached forecourt railings and gate	II
2994	The Bell Inn PH	II
2995	The Hanbury Arms PH	II
2996	Tower to the south west of, and attached to, The Hanbury Arms	II*
3063	Little Bulmore	II
3069	The Bulmore	II
3079	Wall of Nos. 14 and 15A	II
3088	Penrhos Farmhouse	II
3094	Telephone Call-box outside the Post Office	II
3095	Telephone Call-box near The Goldcroft PH	II
3096	Telephone Call-box at the junction with Bulmore Road	II
3121	Church of St Michael and All Angels	II*
3122	Churchyard cross at the Church of Saint Michael and All Angels	II
3123	The Greenhouse Public House	II
3125	Pontrhydyrun Baptist Church	II
3128	Ruins of barn at Llantarnam Abbey	II
3137	Ty-coch Farmhouse	II
3138	Cwm Aaron and attached barn	II
3139	Waun-y-pwll	II
3140	Llanyrafon	II*
3141	Glansirhowy Farm	II
3142	Church of All Saints	II*
3143	Zion Baptist Chapel	II
3144	Ponthir House Inn	II
20525	Woodlands House	II
20740	Elim United Reformed Church and attached Schoolroom	II
21923	,6,High Street,Caerleon,Newport,,NP6 1AE	II
22083	Lodge Farmhouse with attached granary and cartshed	II
22084	Derelict Cottage at Lodge Farm	II
22574	Great House and Heron House	II
25494	Llanfrechfa Grange	II
26082	Brook House and railings	II
26107	,19,Cross Street,Caerleon,Newport,,	II

26108	,96,Mill Street,Caerleon,Newport,,	II
26109	,28,High Street,Caerleon,Newport,,	II
26110	Lodge Farm Evangelical Church	II
26111	Garden Wall of The Priest's House	II
26112	Garden Wall of The Mynde	II
26113	Garden Wall of Castle Acre	II
26114	Garden Wall of Castle Acre	II
26115	Garden Wall of Pen-y-mynde	II
26116	Garden Wall of Pen-y-mynde	II
26117	Lych Gate of the Church of St Cadoc	II
26118	Monument of James Rennie in the Churchyard of the Church of the Holy Trinity	II
26120	Caerleon Bridge	II
26121	Church of the Holy Spirit	II
26122	,35,High Street,Caerleon,Newport,,	II
26123	War Memorial Drinking Fountain in Town Hall Park	II
26124	Church of Ss David, Julian and Aaron	II
26125	The Priest's House with attached wall and gates	II
26126	The Malt House Hotel	II
26127	Quay Wall and Slip at the Hanbury Arms	II
26128	Pendragon House	II
26129	Barn at Pen-twyn Farm	II
26130	,25,High Street,Caerleon,Newport,,	II
26133	Entrance gates and railings of The Endowed School	II
26134	Letter Box outside the Post Office	II
26135	Entrance gates and railings of Priory House	II
27026	Llanyrafon Mill	II
81749	Enclosure railings, walls, gatepiers and Memorials at the Conway Burial Yard	II
81750	War Memorial in front of Pontrhydyrun Baptist Church	II
81859	Aqueduct over Dowlais Brook on Monmouthshire and Brecon Canal, partly in Cwmbran Central Community	II
81860	Bridge on drive at Llantarnam Abbey	II
81861	Canal bridge at Drapers Lock on Monmouthshire and Brecon Canal	II
81862	Canal bridge at Rachels Lock on Monmouthshire and Brecon Canal	II
81863	Canal bridge at Shop Lock on Monmouthshire and Brecon Canal	II
81864	Canal bridge at Top Lock on Monmouthshire and Brecon Canal	II
81865	Canal bridge at Tredegar Lock on Monmouthshire and Brecon Canal	II
81867	Forecourt walls and gates at Llantarnam Abbey	II
81868	Garden walls and gates at Llantarnam Abbey	II
81870	Memorial to T. Leadbetter in churchyard of Church of St Michael and All Angels	II
81871	Porth Mawr gateway, lodge, walls and railings at Llantarnam Abbey	II

81872	The Cottage and attached walls of walled garden at Llantarnam Abbey	II
81873	The Monks Cell at Llantarnam Abbey	II
81874	Two statues in garden to E of Llantarnam Abbey	II
81935	Churchyard cross at Church of All Saints	II
81936	The Vicarage	II
82035	Aqueduct over Dowlais Brook on Monmouthshire and Brecon Canal (partly in the Llantarnam community)	II
84370	Garden walls, steps and terracing at Glen Usk	II
84371	Pergola surrounding tennis court at Glen Usk	II
84372	Stable Court at Glen Usk, including fountain to south-west	II
85246	Llantarnam Abbey	II*
87122	Colomendy Wood including attached Garage and Stabling	II
87124	Cross in Churchyard of Church of St. John the Baptist	II
87125	Double Limekiln	II
87127	Llansor Mill Cottage	II
87129	Oaklands	II
87726	Principal's Residence at the University of South Wales, Caerleon Campus	II
87727	Caretaker's / Gardener's Lodge at the University of South Wales, Caerleon Campus	II
87728	Gate Piers at the University of South Wales, Caerleon Campus	II
87729	Former Caerleon Teacher Training College Building	II
87770	Court Road Industrial Estate Sign	II
87806	2 Jim Crow Square	II

Soil Policy & Agricultural Land Use Planning Unit
Uned Polisi Pridd a Chynllunio Defnydd Tir Amaethyddol
Yr Adran dros Newid Hinsawdd a Materion Gwledig /
Department for Climate Change & Rural Affairs.

Llywodraeth Cymru
Welsh Government

Ref: DNS CAS-02366-F2C3K8

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

By Email: PEDW.Infrastructure@gov.wales

20th of November 2025.

Dear Tali Perry,

Re: Scoping Direction Consultation Response - DNS CAS-02366-F2C3K8– Proposed Candwr Solar Farm, Ponthir, Monmouthshire.

In reference to the recent e-mail from PEDW consulting the Department on the above Screening Consultation, the Department offers the following response for your consideration.

The Department considers there is likely to be significant environmental effects from the proposal, and that an Environmental Statement should be produced to assess the impacts. From the Departments' perspective, 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. Policy Context:

The Department considers the policies and guidance below are applicable to this assessment:

- Technical Advice Note (TAN) 6[1]
- Paragraph 3.58 and 3.59 of Planning Policy Wales (PPW)[2]

[1] https://www.gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities

[2] https://www.gov.wales/planning-policy-wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

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.

- Paragraph 6.4.3 (bullet 4) of PPW

- Policy 9 of the National Development Framework (NDF) – Future Wales[3]

- 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 2022[4]

2. Agricultural Land Classification (ALC) and BMV Policy:

As noted in the Scoping Repost, the Department can confirm that we have previously (2022) engaged with the applicants' surveyor to agree the areas and methodology for the ALC survey of the sites. This related to technical advice only, not the merits or otherwise of any proposal (TAN6: Annex B6).

The areas agreed have been surveyed in detail, and the ALC report is submitted in Appendix G of the Scoping Report (Ref: Agricultural Land Classification, Candwr Solar Farm – 8th August 2025- Issue 3).

The report concludes the survey area to be 13.8ha ALC Grade 2, 5.4ha of ALC Subgrade 3a, 36.2ha of ALC Subgrade 3b, 6.2ha ALC Grade 4 and 2.6ha 'non-agricultural' land. The report also notes a total of 49.3ha, which has not been surveyed as agreed, as non-BMV land according to the Predictive ALC map.

The Department has undertaken a desk-based validation of the ALC survey against the 'Agricultural Land Classification of England and Wales: Revised criteria for grading the quality of agricultural land' (MAFF 1988). This confirms the findings may be accepted as an accurate reflection of the agricultural land quality on the site. This confirms the site contains Best and Most Versatile (BMV) agricultural land as defined in PPW 12, paragraph 3.58.

The Department expects the applicant to provide clear evidence in the assessment 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'. We would also disagree with the applicants view on sensitivity assessment on BMV (paragraph 6.4.16) – PPW and the DCPO letter are clear this matter.

BMV agricultural land must be scoped into the assessment.

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[3] https://www.gov.wales/future-wales-national-plan-2040-0

[4] https://www.gov.wales/best-and-most-versatile-agricultural-land-and-solar-pv-arrays

3. **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, depth 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.

4. **Soils**

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. The proposal is likely to have significant impacts upon these important services and functions and therefore must be assessed.

A soil management scheme should be prepared by the applicant, informed by the baseline ALC report and soil resources and physical characteristics, and be considered as part of the ES process.

The Department disagrees with the applicant's statements regarding soil impacts and reversibility of the development at decommissioning as this is not evidenced.

The Department considers that soils, soil functions and services 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

Adran yr Economi a'r Seilwaith
Department for Economy and Infrastructure

Llywodraeth Cymru
Welsh Government

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

Eich cyf / Your ref CAS-02366-F2C3K8

Ein cyf / Our ref 25/SW-7681

24 October 2025

Dear Sir/Madam,

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

Land at Court Farm, Ponthir

Installation and operation of ground mounted solar photovoltaic arrays with all associated works, equipment and necessary infrastructure

I refer to your consultation of 03/10/2025 regarding the above planning application and advise that the Welsh Government as highway authority for the A4042 trunk road does not issue a direction in respect of this application.

General Notes

1) The EIA scoping report identifies solar farm components will be transported to the Site by Heavy Goods Vehicles (HGV), the largest of which will be a 16.5 metre articulated HGV and no Abnormal Indivisible Load (AIL) deliveries will be required for the works. Should this stance change, the applicant will be required to inform us at the earliest opportunity as further details will be required for review.

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

Yours faithfully

Rhodri Thomas

From: Ross Letheby <[redacted]>
Sent: 06 October 2025 09:49
To: Perry, Tali (LGHCCRA - Planning) [redacted]>; PEDW – Seilwaith / Infrastructure <pedw.infrastructure@gov.wales>
Subject: RE: EIA Scoping Consultation - DNS CAS-02366-F2C3K8 - Candwr Solar Farm

Good Morning

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

Thank you

Regards,
Ross Letheby

Ross Letheby | Regional O&M Manager
Operational Technology Operations

Dŵr Cymru
Welsh Water

[redacted] | [redacted]

For OT support – contact the ORC on 0303 313 0103
For OT news – visit our OT Shop Window Yammer Community

BE YOURSELF

From: ORC <ORC@dwrcymru.com>
Sent: 06 October 2025 08:35
To: Ross Letheby <[redacted]>
Cc: [redacted]; pedw.infrastructure@gov.wales
Subject: FW: EIA Scoping Consultation - DNS CAS-02366-F2C3K8 - Candwr Solar Farm

Morning Ross,

Can you review and advise if this will have an impact from an OT perspective, please?

Regards,

Katie Perman

ORC Support

ORC | Operational Services

Mobile: [redacted]

Please click here for the most up to date versions of our company **PT IMS forms**

Did you know, you can click here to raise an **OT Ops Reactive Work Request.**

From:	Shirley Rance on behalf of NSIP Applications
To:	PEDW – Seilwaith / Infrastructure
Cc:	NSIP Applications
Subject:	DNS - Candwr Solar Farm - EIA - HSE Response dated 14/10/2025
Date:	14 October 2025 08:42:25
Attachments:	image002.png 2025-10-03 - EIA Scoping Consultation Letter - DNS CAS-02366-F2C3K8 - Candwr Solar Farm.pdf

---

Dear Ms Tali Perry,

Thank you for your email dated 3 October 2025 consulting HSE on the Proposed Candwr Solar Farm - Development of National Significance (DNS).

Please find HSE's advice below.

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

Will the proposed development fall within any of HSE's consultation distances?

1. With reference to **Appendix A - Site Location Plan** found in **[https://planningcasework.service.gov.wales/case/CAS-04421-B8S4Q5 Reference: DNS CAS-04421-B8S4Q5 - Y Bryn Wind Farm Grid Connection, 2025-09-39 – EIA Scoping Request – Scoping Report]** on which is shown a red-lined ***Site Boundary***, the proposed development falls within HSE public safety consultation zones associated with Major Accident Hazard Pipeline(s):

    a. Henllys / Llanwern (VS008) [HSE ref: 4133415, Transco ref: 1539] - Wales and West Utilities

2. The red-lined ***Site Boundary*** does not currently fall within the consultation distance of Major Accident Hazard Installation(s).

3. HSE will not advise against the proposed development, providing no population(s), either temporary or permanent, is introduced within any of HSE's public safety zones nor would HSE advise against Workplaces (DT1.1 - Workplaces)*, providing for less than 100 occupants in each building and less than 3 occupied storeys.

    * HSE's Land Use Planning Methodology Table 1 Development type: People at work, Parking [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

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

Regards

NSIP Consultation Team
Health and Safety Executive

Shirley Rance | Business Support Team
Health and Safety Executive | Chemical, Explosives and Microbiological Hazards Division
NSIP.Applications@hse.gov.uk

HSE PROTECTING PEOPLE AND PLACES

From: [redacted] **On Behalf Of** PEDW.Infrastructure@gov.wales
Sent: 03 October 2025 14:31
Subject: DNS - Candwr Solar Farm - EIA - 4.2.1.28371. - consultation email

⚠ **CAUTION:** This email originated from outside the HSE Domain. Do not click links or open attachments unless you recognise the sender and know the content is safe. Always verify the sender's identity before responding or sharing any information.

Dear Sir / Madam,

Please find attached a consultation letter relating to a Scoping Direction for the above proposed development.

The Scoping Report is available via the casework portal (link in the letter). Please note that we are experiencing intermitted issues with the Planning Casework Portal and have published the following announcement regarding this: https://www.gov.wales/planning-casework-portal-intermittent-problems

If you have any problems accessing the document or are unlikely to be able to respond by Friday 07 November 2025, please let us know.

Kind regards,
Tali

Tali Perry
[hi | she / her]
Myfyriwr-Gynllunydd / Student Planner
Penderfyniadau Cynllunio ac Amgylchedd Cymru | Planning and Environment Decisions Wales
Llywodraeth Cymru | Welsh Government
PCAC Ymholiadau Cyffredinol Ffôn | PEDW General Enquiries Tel: [redacted]

PCAC
PEDW
Penderfyniadau Cynllunio ac Amgylchedd Cymru
Planning & Environment Decisions Wales

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

Gwasanaeth Tân ac Achub De Cymru
South Wales Fire and Rescue Service

PEDW
Crown Buildings
Cathays Park,
Cardiff,
CF10 3NQ
PEDW.Infrastructure@gov.wales

Our Ref: DL/32-15602 (BR12)
Your Ref: DNS CAS-02366-F2C3K8

Date: 06 October 2025
Contact: Station Manager D. Lijertwood
Tel: [redacted]
E-mail: firesafety@southwales-fire.gov.uk

Dear Sir/Madam,

THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016

PROPOSAL: INSTALLATION AND OPERATION OF GROUND MOUNTED SOLAR PHOTOVOLTAIC ARRAYS WITH ALL ASSOCIATED WORKS, EQUIPMENT AND NECESSARY INFRASTRUCTURE
LOCATION: LAND AT COURT FARM, PONTHIR, MONMOUTHSHIRE

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 by The Authority and the following standing advice is given at this stage:

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

a. adequate water supplies on the site for firefighting purposes; and

b. access for emergency firefighting appliances

Further comments will be made at full Town & Country application stage.

Yours faithfully,

Duly signed and authorised by

[redacted]

for Assistant Chief Fire Officer

Enc: BR12 Appendix

BR12 Appendix

1.0 Access for Fire Appliances

Typical vehicle access route requirements:

Appliance Type	Min Width Road	Min Width Gate	Min Turning Circle between Kerbs
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
Pump	19.2	3.7m	18
Aerial Appliance	29.0	4.0m	24

Pedestrian Priority

Pedestrian schemes must consider 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 then 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 waterfront 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.

2.7 Conclusion

Developers should engage in early, collaborative discussions with Dŵr Cymru Welsh Water, **Natural Resources Wales (NRW)**, and the Fire and Rescue Authority to ensure that adequate water supplies are available for firefighting purposes.

The Fire and Rescue Authority reserves the right to require the provision of static water supplies on-site as a condition of planning consent where existing water supply infrastructure is insufficient to address the assessed fire risk. This approach aligns with current national guidance and legislation, including the:

- **Well-being of Future Generations (Wales) Act. 2015**,
- **Building Regulations Approved Document B (Fire Safety 2019)**
- **British Standard BS 9990:2016 Non-automatic firefighting water supplies.**

To:
Planning and Environment Decisions Wales

Crown Buildings

Cathays Park

Cardiff

CF10 3NQ

4 November 2025

(by email)

Subject: EIA Scoping Consultation for DNS CAS-02366-F2C3K8 - Candwr Solar Farm

Dear Sir/Madam,

I write to provide observations and additional evidence to the Environmental Impact Assessment (EIA) Scoping Report submitted in respect of the proposed Candwr Solar Farm at Court Farm, Ponthir, Monmouthshire.

Despite multiple formal and informal consultations and discussions with the scheme proposers, TotalEnergies, and their agents, Pegasus, it is deeply concerning that the Scoping Report fails to reflect or respond to the numerous substantive issues raised by local residents, businesses, and stakeholders. These omissions not only undermine the integrity of the EIA process but also raise serious questions regarding their potential compliance with statutory obligations under the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017.

Key Concerns and Omissions

1. **Traffic and Access Impacts**
   The proposed construction phase will introduce significant HGV traffic along narrow country lanes routinely used by residents for daily access, leisure pursuits, and agricultural operations, including livestock movement and crop harvesting. The disruption and safety risks are unacceptable. The rural roads are not designed to cope with such traffic – potholes and surface subsidence are regular issues which will be exacerbated through regular heavy movements.
   Furthermore, the proposed access routes traverse congested residential streets, notably
   - Caerleon, which is designated as an Air Quality Management Area (AQMA). The use of Caerleon as a construction traffic route is prohibited under AQMA regulations, yet this is not acknowledged in the Scoping Report. Furthermore, we have communications from Newport City Council Planning and Environmental Health that this route is prohibited, in the same manner that other development traffic has already been prohibited. The road serves an infants school, primary and secondary schools; doctor and dentist surgery and pharmacy; and Roman baths, amphitheatre and museum which are significant tourist attractions.

- Caerleon: Station Road and Ponthir Road (B4236). The Scoping Report implies that all traffic, whatever route taken, will pass through this area. Station Road is regularly congested due to cars and commercial vehicles parking on both sides of the road, combined with school children crossing the road. The point where Station Road changes into Ponthir Road is a pinch point where larger vehicles such as buses have to mount pavements when meeting large oncoming traffic.
- Ponthir Road junction with Candwr Road: all construction traffic will travel through this narrow single lane route. There is no off-road parking for residents and no pavement. Access is difficult for cars – larger vehicles often have to slow to dead-stop to negotiate the narrow passage. Homes and structures along these routes are old and fragile (some 18th-century buildings without modern foundations). The Ponthir House pub (c.1710), for example, lies on the narrow section of Candwr Road and would be subject to continuous vibration from HGVs rumbling past, just feet away. There is a real risk of structural damage to these historic properties from sustained HGV traffic, not to mention constant noise and air pollution disrupting residents' lives.
- Candwr Road: this is single track road with few passing places, heavily used by riders from livery stables along the road (100 horses in total); walkers and joggers from Ponthir, ranging from parents with prams to elderly with walking aids; running and cycling clubs; and agricultural vehicles travelling between fields.
- Once in the site the materials are proposed to be decanted into storage compounds. One of these is at Shaftesbury Farm, with onward access to other parts of the site through 6km of new internal tracks. The onward transporting vehicles will need to cross Candwr Road. The only crossing point is on a single track, double blind bend which is highly dangerous. Indeed, application DM/2020/00446 to Monmouthshire County Council was for an access off the highway, adjacent to the aforementioned crossing point. The Highways Officer commented that the proposed access was "*not considered suitable for vehicular use and represent a significant highway safety issue for those accessing and egressing the land and users of the adjacent public highway…*". The applicant subsequently withdrew the application due to the insurmountable issue. TotalEnergies propose crossing this road at this point, numerous times each day, during the construction period with slow moving agricultural vehicles to transport materials, with almost zero highways visibility, which is clearly a significant highways hazard to all road users, including users of the public footpath which is alongside the crossing point on either side of the highway.
- A472 through Usk High Street and Usk Bridge. HGV traffic is prohibited *via* this route. Damage to the listed bridge is a significant issue as well as safety on the narrow High Street and the primary school on the roadside.

The proximity of numerous HGVs travelling in close proximity to residential dwellings, pedestrians, horses and cyclists along the access route will result in significant danger, noise and vibration disturbance. This needs to be scoped into the ES and will also need to cover the impact of pile driving over a sustained period of construction, during all weathers. It should also be taken into consideration that the reverse process, during deconstruction, will result in large numbers of movements because the materials will not be capable of being neatly stacked on trailers following retrieval from the fields.

Clearly, the deposit of mud on the highway from the fields will be a significant safety issue.

A community funded traffic impact assessment will be provided as crucial evidence in due course.

2. **Impact on Local Businesses and Community Safety**
   The proposal threatens the viability of local businesses, including a well-established livery yard that will be forced to close due to safety and access concerns – letters from livery customers available upon request). Farms will be unable to move freely during busy harvest periods and movement of livestock along the highway will no longer be possible. Additionally, the proposed routes pass near local schools, where children are frequently present during break times, posing a serious risk to child safety. Clearly, air quality needs to be scoped into the ES on account of the need for, we estimate, 1,200-1,400 inward movements of HGVs to deliver stone for 6kms of tracks and all associated infrastructure for the development proposal.

3. **Site Layout and Environmental Suitability**
   The site layout fails to account for north-facing fields and areas subject to high wind exposure. The site's elevated and exposed nature makes it highly susceptible to wind gusts, which pose a real risk of damage to solar panels and the safety of surrounding residents once the panels become dislodged from their housing.
   Moreover, while one landowner has been afforded a 100m buffer between his residence and any panels, tracks or infrastructure, no such consideration has been extended to other residential dwellings equally impacted by the proposal. This is inequitable and unjustifiable.

4. **Agricultural Land Classification (ALC) Report – Factual Inaccuracy**
   The ALC report incorrectly asserts that non-tested land is non-Best and Most Versatile (non-BMV) based solely on the Predictive ALC map. This is demonstrably false, as evidenced in Appendix 1 to this letter. The failure to conduct proper field surveys across all relevant parcels undermines the credibility of the report and its conclusions. There is a disproportionately large proportion of BMV land lost to productive agriculture on this site. The ability to restore the site to its former condition after 40 years is questionable given the amount of trafficking required to construct the proposal.

5. **Landscape and Visual Impact Assessment – Misrepresentation**
   The viewpoints selected for the Landscape and Visual Impact Assessment do not reflect the areas of greatest visual sensitivity. The reality is that large expanses of black glass on sloping fields within designated Special Landscape Areas cannot be effectively mitigated visually. This fundamental issue is not addressed in the Scoping Report. There should be a thorough assessment of Residential Visual Amenity in the standalone ES LVIA Chapter as this will be the view from numerous dwellings, including the setting of listed building private dwellings which adjoin the site of the panels. We have procured an independent Landscape ZTV of the area which clearly demonstrates that the proposed viewpoints are misrepresentative and incomplete. The viewpoints proposed in the Scoping Report do not include the most sensitive and impacted sites (see Appendix 2 to this letter).

6. **Health and Safety Oversights**
   It is extremely disappointing that the developers originally failed to identify the presence of a high-pressure gas main running through the site, which bisects a significant portion of the proposed development area. It is our understanding that excavation near this gas line is prohibited, and connecting cables cannot pass over or under it. A similar restriction applies to the large water mains crossing the site. These oversights demonstrate a lack of due diligence and disregard for the health and safety of workers and residents. This warrants scoping into the ES, the risk of accidents and major disasters, particularly given the proximity of the gas line to residential areas and the Grange Hospital.

7. **Glint and Glare - Proximity to Grange University Hospital and Aviation Safety**
   The Scoping Report makes no mention of the nearby Grange University Hospital, which is the primary Accident & Emergency facility for South East Wales. The hospital operates an emergency helicopter service, with flight paths regularly passing over the proposed site. The nearest panel is approximately 1km from the hospital, and the risk of glint and glare affecting helicopter operations during critical landing procedures is a serious safety concern. The omission of this issue from the Scoping Report is negligent.

8. **Flood Risk – Omission of Full Assessment**
   The Scoping Report fails to include a dedicated chapter on flood risk, despite clear evidence that such an assessment is essential. Ponthir is already vulnerable to flooding from both Candwr Brook and the Afon Llwyd, which run through and adjacent to the village. Vehicles are regularly damaged or abandoned annually as Candwr Brook overtops onto Candwr Road. Historical and recent flood events have demonstrated the severity of this risk:

- During **Storm Bert in November 2024**, river levels on the Afon Llwyd at Ponthir peaked at **2.849 metres**, exceeding the previous record set during **Storm Dennis in February 2020** (2.733m). These events caused flooding to homes and infrastructure in Ponthir and surrounding areas.

- Torfaen Council confirmed that **Ponthir Community Hall** was placed on standby for emergency shelter during Storm Bert, indicating the seriousness of the threat to residential safety.

- The **Afon Llwyd at Ponthir** is a designated **Flood Warning Area**, with multiple historic flood warnings issued, including on **24 November 2024**, when flooding to property and roads was expected and ongoing.

  The proposed development will introduce thousands of solar panels and associated infrastructure, significantly increasing the extent of hard surfaces in the valley. This will exacerbate surface water runoff, particularly on the **heavy clay soils** present across the site. These soils are poorly permeable and often saturated during periods of rainfall, making mitigation of runoff extremely difficult. Trafficking across the site during the construction phase will increase ground compaction and significantly reduce percolation potential to mitigate hard surface run-off.

  I addition there are proposed 6km of new permanent internal tracks for servicing the site. The tracks alone amount to some 30,000m^2 (3ha) of additional impermeable area, excluding the new storage compounds. These would act as conduits for increasing

volumes of water as the progress downhill- ultimately accumulating in Candwr Brook and properties on the way. Clearly, this will result in increased flood risk as well as contamination through diffuse pollution. Whilst the applicants acknowledge at paragraph 5.4.4 of the Scoping Report that " *there is a potential for increase in surface run off from soil compaction during construction, however, impacts would be very localised and given the rural nature of the site any increased runoff effects would be in short term and not significant in the context of the wider catchment*" there is a neglect of consideration of other factors, which is clearly a gross oversight.

Residents who have previously experienced flooding in their homes are rightly concerned that this development will worsen the situation and affect more properties. The proposed impermeable hard surface area and disruption to natural drainage patterns will likely lead to more frequent and severe flooding downstream in Ponthir.

Given the documented flood history and the known hydrological characteristics of the area, it is unacceptable that the Scoping Report proposes to **scope out** flood risk from the Environmental Statement. A **full and detailed ES chapter on flood risk** is not only warranted but essential to ensure the safety and resilience of the local community.

The community will provide a robust flood risk assessment of the proposal in due course.

Conclusion

The cumulative effect of these omissions and inaccuracies reflects a concerning lack of engagement with the community and a failure to uphold a Duty of Care. We urge you to carefully scrutinise the Scoping Report, in view of these comments, which demonstrates the lack of meaningful engagement with affected stakeholders.

The local residents and whole community are particularly concerned that the applicants' impetus to achieve planning approval for this site is being undertaken to the complete detriment of the local population and that it will have an adverse impact on future generations' wellbeing and welfare. Unless these issues are addressed at an early stage, there is a concern that they will be swept under the carpet at a later stage of the planning process.

We request an acknowledgement of receipt of this letter and a commitment to consider the issues raised herein.

Yours faithfully,

Nathan J Hennah – Chair

Ieuan Willams – Vice Chair

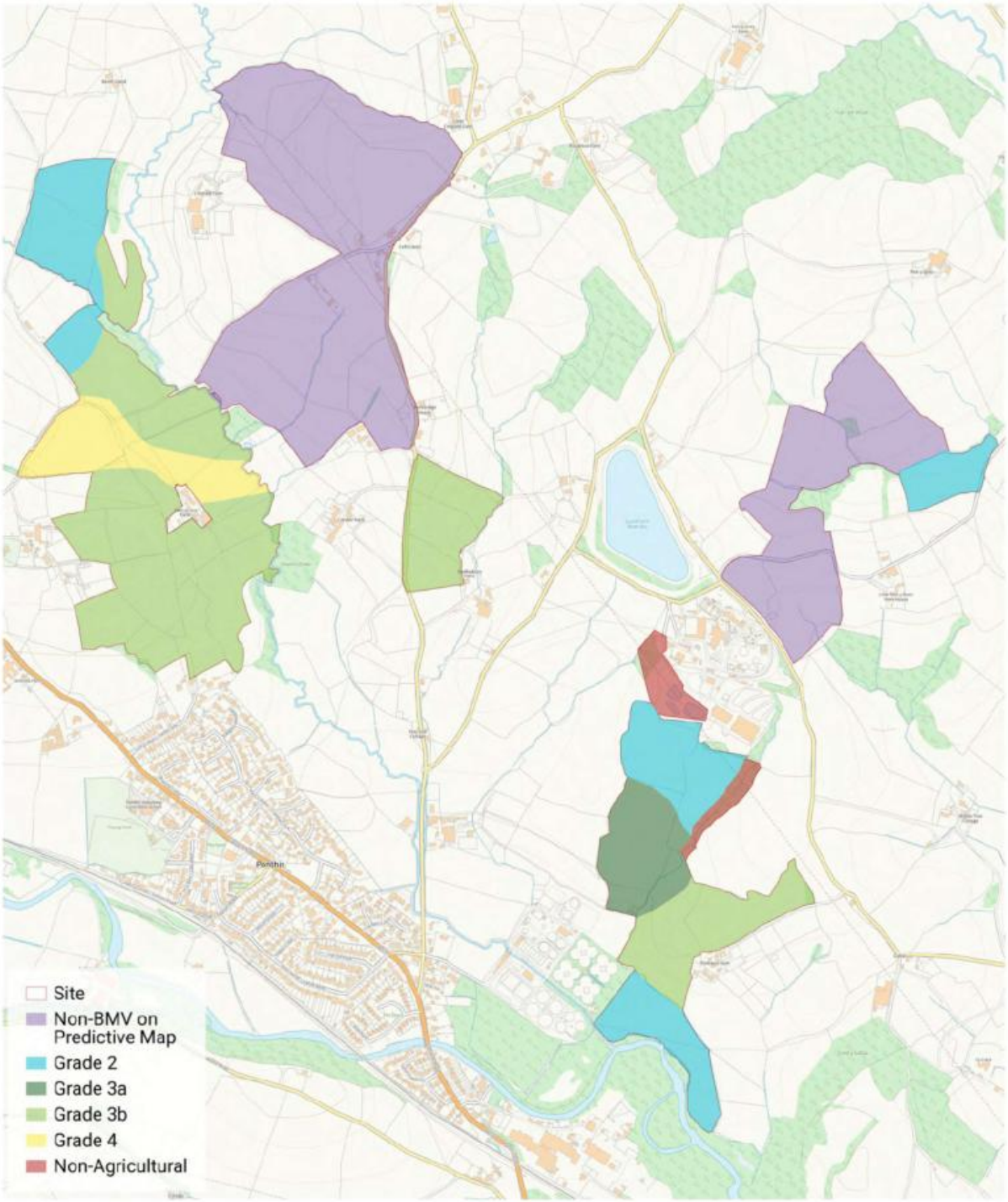
On behalf of Candwr Solar Objection Group (Ponthir and District Residents)

Cc: Local Elected Representatives (MP, MS, County and Community Councillors)

Appendix 1 – TotalEnergies ALC Mapping (a) and Welsh Government Predictive ALC Mapping of Original Site (b)

Appendix 6 - Map of ALC Grade

Land App



Produced on Land App, Aug 6, 2025.
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100 m
Scale 1:6000 (at A2)

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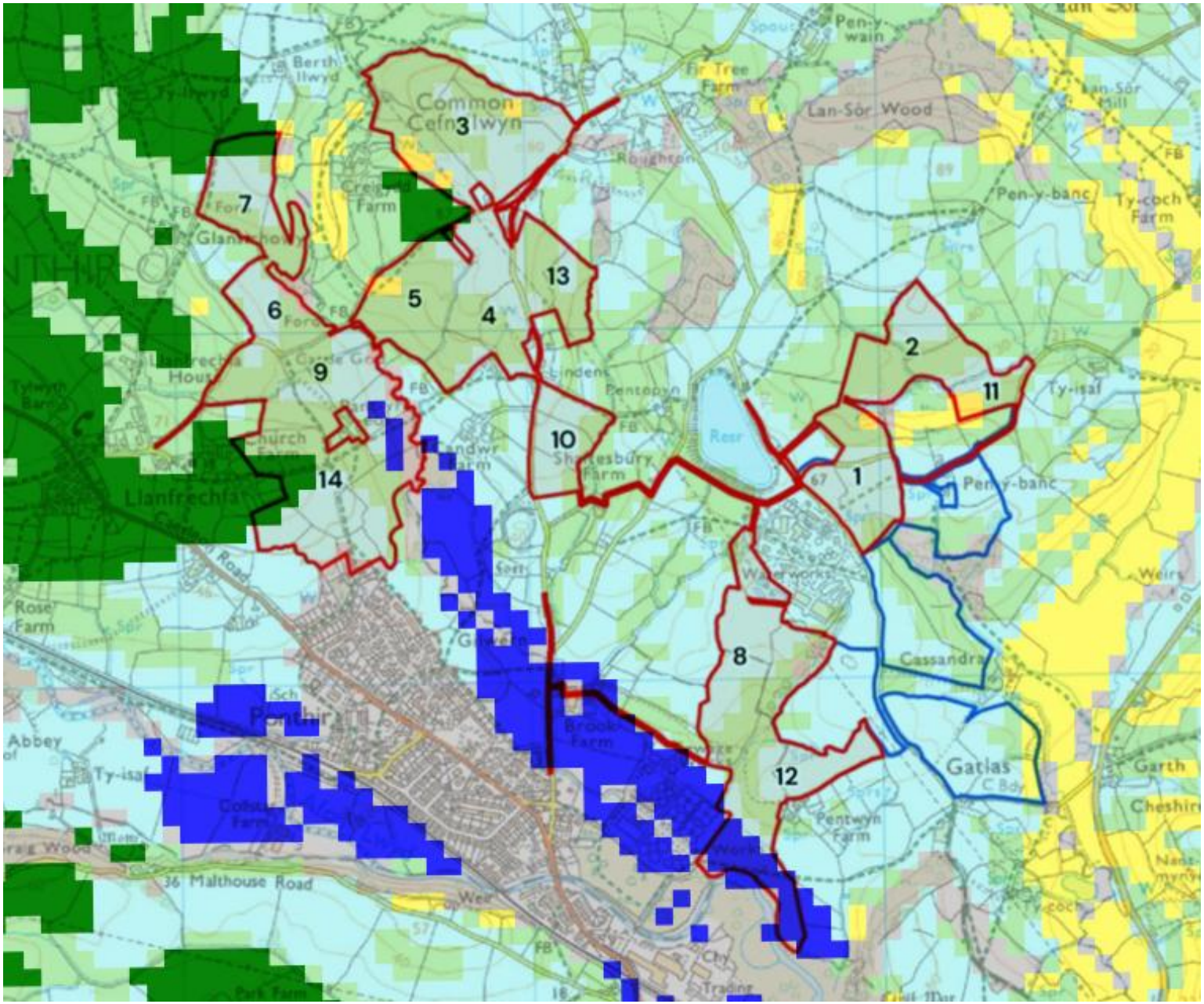
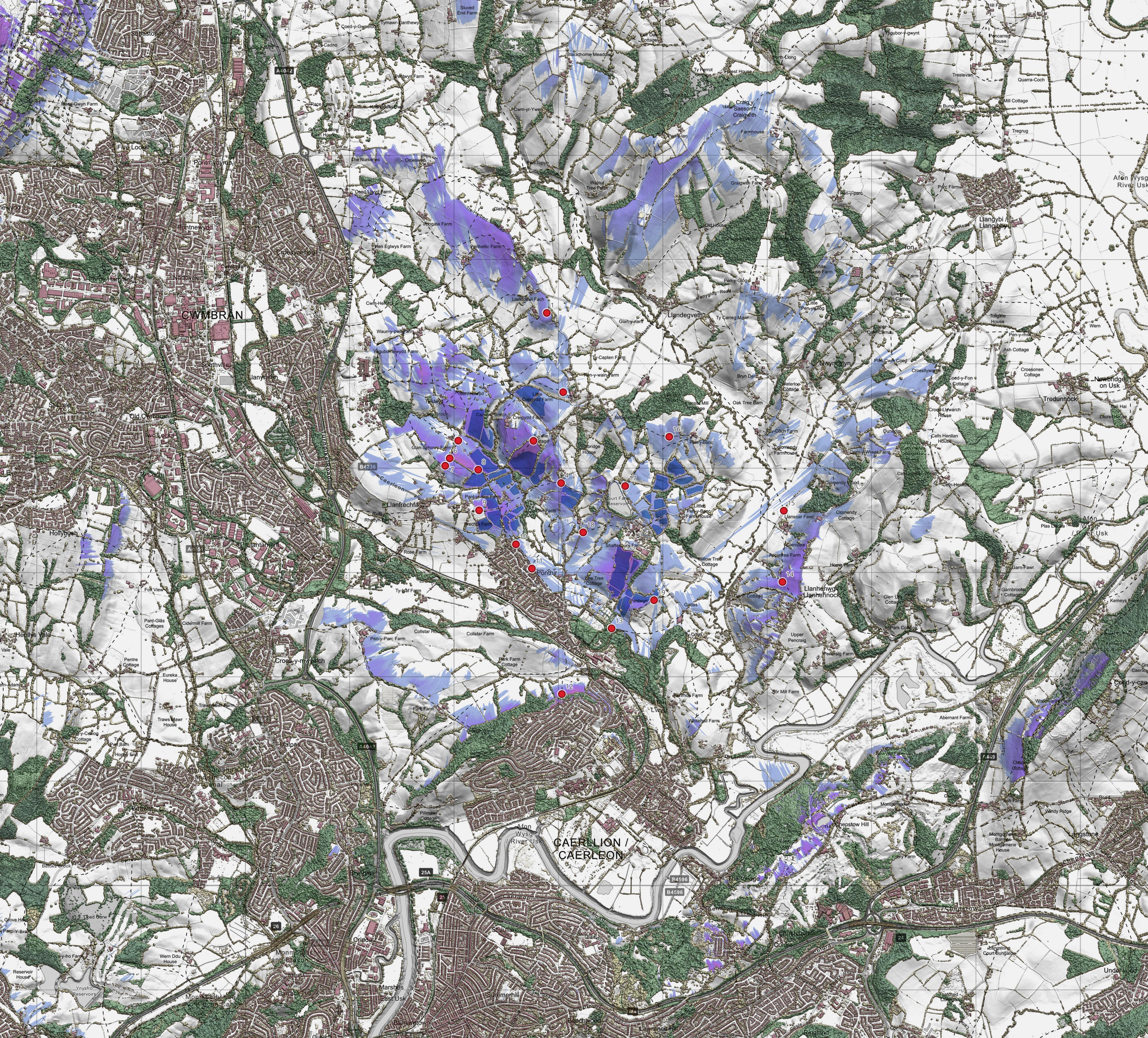


- Grade 1
- Grade 2
- Grade 3a
- Grade 3b
- Grade 4
- Grade 5
- Non Agricultural
- Urban

Appendix 2 – Candwr Solar ZTV (including all LIDAR Buffers)


CWMBRAN
CAERLLION / CAERLEON
Afon Wysg / River Usk
Llandegveth
Llanfrechfa
Ponthir
Llanhennock
Llangybi / Llangibby
Llywyncelyn
Tredunnock
Newbridge on Usk
Llantarnam
Croes-y-mwyalch
Malpas
Bettws
Crindau
Marshes East Usk
Summerhill
Beechwood
Lawrence Hill
Ringland
Langstone
Chepstow Hill
Pontnewydd
Croesyceiliog
Sebastopol
Five Locks
Hollybush
Oakfield
Southville
Llanyrafon
Old Cwmbran
Forge Hammer
Hendre
Pen-y-Pound
Pen-y-Lan
Craigwith
Craig y Saeson
Ton
Tredunnock
Llanhennock
Llanfrechfa
Ponthir
Bettws
Malpas
Crindau
Marshes East Usk
Summerhill
Beechwood
Lawrence Hill
Ringland
Langstone
Chepstow Hill
Caerleon
Llantarnam
Croes-y-mwyalch
Llanhennock
Llanfrechfa
Ponthir
Llandegveth
Llywyncelyn
Llangybi / Llangibby
Tredunnock
Newbridge on Usk
Afon Wysg / River Usk
Afon Wysg / River Usk
Afon Wysg / River

Peters, Georgia (CSI - Planning & Environment Decisions Wales)

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

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-----Original Message-----
From: Chris Thomas <[redacted]uk>
Sent: 05 November 2025 12:08
To: PEDW – Seilwaith / Infrastructure <PEDW.infrastructure@gov.wales>
Subject: DNS CAS-02366-F2C3K8 Candwr Solar Farm Ltd, land at Court Farm, Ponthir

Hello,

I have a number of comments about the EIA Scoping Request, available online, as submitted by the applicant.

1. Landscape and Visual Impact Assessment.

I note, and strongly agree with, the statement at para.6.1.46 that 'sites on PROW's are assessed to experience a major adverse visual effect as a result of the proposed development'. Given the significant network of footpaths in and around this site, I consider that additional viewpoints and photomontage locations will be needed to fully illustrate this point. I suggest, on the basis of my regular use of these footpaths, that at least 3 other viewpoints are needed - firstly, location 9 in Appendix E needs to be divided by about 50yards to fully capture the view northwards and the view eastwards; secondly, to capture the effect on the Candwr Brook valley, an additional viewpoint looking

NE from the footpath exit at the rear of Pant-yr -eos farm; and the view in all directions from the middle of Field Number 13, field gate and stile, needs an additional viewpoint here.

2. para. 2.1.26 Description on field parcel 13

It is incorrect to say that this field parcel lies 'approx. 60m from the northern boundary of Ponthir'. In fact, this parcel immediately abuts the Ponthir village boundary (as defined by Torfaen LPA in its current Development Plan) and shares the boundary with 4 properties, one of which is mine. I have already informed the applicant that the site boundary is incorrect in this location as it appears to include the whole of my lengthy back garden. Also the exact alignment of major underground infrastructure across field parcel 13 needs to be checked as it does not accord with local memory of its construction location.

3. Human Health.

para. 5.2. I consider that assessment of the effect of the proposal on aspects of human health should not be scoped out. I believe that the LVIA should include the effect on users of the footpath/lane network, for recreational and amenity purposes, in terms of their physical and mental well-being, as being a central function of this kind of landscape. Simply because it is not 'designated' does not mean that it does not contribute to individual and collective well-being. Well being is a recognised policy objective in Wales and this should be given due weight in any assessment.

4. para. 6.2.48

Why are Non-Statutory Designated Areas for Nature Conservation scoped out? I have been informed that such areas are under review in Torfaen - is this the case? The line of the Candwr Brook,forming the boundary between Monmouthshire and Torfaen might be one of these areas and may be adversely affected by new access roads for construction and maintenance.
Together with adjacent ancient woodlands and hedgerows (many of which feature on the Tithe Maps of the 1830's) these factors should be scoped in as an integral part of the assessment of bio-diversity.

5. Two points of clarification have been requested in conversation with neighbours. Firstly, where exactly are the site access roads for construction and maintenance? It is very difficult to identify them from the maps provided online. A separate map just showing the proposed roads would be very useful. Secondly, it is not clear how many opportunities the public will have to make their views and objections known. It appears that as well as the 4 week non-statutory consultation earlier in the year, there will be a statutory pre-application consultation under article 8 and after the planning application is made and validated there will be a period to make representations direct to PEDW. Am I right?

regards,

Chris Thomas

'Netherlea', Lamb Lane, Ponthir, NP18 1 HA

:

https://llyw.cymru/penderfyndiadau-cynllunio-ac-amgylchedd-cymru | https://gov.wales/planning-and-environment-decisions-wales

From: [redacted]
Sent: 08 July 2025 23:49
To: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>
Cc: Fay Bromfield [redacted]
Subject: DNS CAS-02366- Court Farm Solar

To: Planning and Environment Decisions Wales

MY OBJECTIONS TO THE PROPOSAL related to DNS CAS-02366 - Court Farm Solar

I live near 4 junctions of lanes close to Court Farm Water Treatment Works. As well as having numerous residents, these lanes are populated by walkers, runners, cyclists and equestrianists. The great attraction of the lanes is the beautiful undulating countryside in all directions. In the 88 page document of 12th June, I find insufficient attention paid to the great benefit this countryside provides for the populations of local communities. For example, during Covid the lanes were teeming with people. A constant stream went past my home, with many proclaiming the value of the lanes and the surrounding countryside. The wrecking of this priceless amenity would be at a great social cost. Furthermore, to allow construction vehicles past the Ponthir House Inn would be unthinkably dangerous, disruptive, difficult if not impossible, and could render the lanes unusable for recreation.

I've always supported green energy, including solar, and I envisaged I would be sympathetic to any local proposal - until I saw this one. Unlike many solar developments, the proposed area is not sparse and featureless, but is rich in character and unbroken scenery, providing a continuous, rolling, picturesque amenity of farmland and arboreal delights. Furthermore, it is not a single solar farm, but comprises 9 areas which touch tortuously in a way that produces a far greater intrusion than would otherwise be the case. I calculate the aggregate perimeter of the proposed solar panel regions is over 3 times greater than a compact single region of the same area. Because of that disorderly, dispersed arrangement of panels, some homes would be surrounded by them. The proposals mean that my own home would have panels front and back.

Also, the environment under threat is not one of bland uniformity, but varies continuously, is abundant with flora and fauna, has public rights of way and has a plethora of hedgerows and habitats in around 40 small fields with interesting, individual characters.

The proposal is certainly not justifiable in relation to the energy requirements of the waterworks, where only a fraction of the envisaged output is needed. The deception employed in inferring equivalence and dependence makes other aspects of the proposal suspicious, just as the term "temporary" is a huge distortion of its normal meaning. Panel structures up to 4 metres high are specified and that's double the normal height. This magnifies the visual intrusion, especially when combined with high fencing and hedging that could obliterate views from homes and from the maze of lanes that local communities treasure.

I know the local public have other objections, many of which I support, but one specific aspect that concerns me is rainwater run-off from panels in the 3 fields of Shaftesbury Farm that I look out on. Those fields would face me, although not south, with their glare towards me. After living here for 46 years, I've experienced regular flooding of the brook into the bottom of my own field and occasionally onto the Candwr Road. This has created a long diversion of traffic and sometimes left vehicles stuck in floodwater. Run-off from the panels would go directly into the brook and exacerbate the flooding. From where I live, I also appreciate the impact those panel-covered fields would have in ruining the visual setting of the ancient fort on Candwr Road.

A current solar proposal for Selby, by Pegasus Group, states : ". . . . the land was identified as flat, free from obstructions and south facing . . . .". I know that those characteristics are common, public and perhaps political expectations of solar farms, but are the very opposite of this plan.

This is an ugly, environmentally unfriendly, intrusive and socially undesirable proposal which would have less than ideal efficiency. Altogether, it would be an eyesore, a restriction on public engagement with the countryside, a sad degradation of our natural heritage and a shameful scar on the landscape for generations. This dislocated, ill-suited arrangement will encourage public hostility to solar panels in general, to the companies involved and to wider renewable energy aims.

Yours sincerely,

David Powell, Ulett House, Pentopyn Road, Ponthir,
Monmouthshire. NP18 1HT [redacted]

County Councillor Fay Bromfield
Llangybi Fawr Ward
Monmouthshire County Council
[redacted]
3rd November 2025

To:
The Case Officer
Planning and Environment Decisions Wales (PEDW)
Welsh Government
Cathays Park
Cardiff CF10 3NQ

By email and portal submission
Reference: DNS CAS-02366-F2C3K8 – Candwr Solar Farm Scoping Request

Re: Formal Representation – Objection to the Scoping Request for the Candwr Solar Farm DNS Application

Dear Case Officer,

I write in my capacity as the elected County Councillor for Llangybi Fawr Ward, Monmouthshire County Council, to submit a formal objection and representation regarding the pre application consultation submitted by TotalEnergies in relation to the proposed Candwr Solar Farm (DNS reference CAS-02366-F2C3K8).

This letter sets out a range of material planning concerns relevant to the Environmental Impact Assessment (EIA) scoping process and any subsequent consideration of a formal DNS application by the Welsh Ministers.

1. Scale, Location and Agricultural Land Use

The proposal covers approximately 123 hectares of productive farmland, much of which is classified as Grade 3a "Best and Most Versatile" (BMV) agricultural land. Development on this scale would result in the permanent loss of food-producing land contrary to Planning Policy Wales (Edition 12, paragraphs 3.58–3.61) and Future Wales: The National Plan 2040 (Policy 17), both of which require that renewable energy development avoids BMV land wherever possible.

The site also straddles three local authority areas (Monmouthshire, Newport, and Torfaen), which complicates impact assessment and increases cumulative pressures on local landscapes, transport infrastructure, and biodiversity corridors.

2. Landscape and Visual Impact

The proposed site sits in an expansive, visually prominent rural area between Ponthir, Caerleon, and Llangybi, forming part of the distinctive Usk Valley landscape. Large-scale solar arrays across open countryside will introduce significant industrialisation of character, particularly visible from elevated viewpoints, public rights of way, and Special Landscape Areas (SLAs) designated under local development plans.

The Scoping Report materially underestimates both the direct and cumulative visual impacts, and must be required to assess:

- Key viewpoints from Llangybi Hill, the Usk Valley, and public footpaths to the north and east;
- Seasonal variation and glint/glare implications for nearby dwellings and road users; and
- The cumulative landscape effects of multiple solar and renewable schemes across this strategic corridor.

3. Ecology and Biodiversity

The proposed footprint adjoins watercourses and established wildlife corridors known to support otters, badgers, bats, and other protected species. The Scoping Report relies entirely on developer-led baseline surveys with no mechanism for independent verification.

In accordance with TAN 5: Nature Conservation and Planning and the Environment (Wales) Act 2016, the EIA must include:

- Independent ecological surveys verified by an accredited ecologist;
- Consideration of cumulative habitat fragmentation; and
- Specific mitigation proposals for European Protected Species and riparian habitats linked to the Candwr Brook catchment.

4. Hydrology and Flood Risk

Portions of the site lie within Flood Zone C2 and low-lying areas associated with the Candwr Brook and its tributaries. The current Scoping documentation fails to demonstrate compliance with Technical Advice Note 15 (TAN 15) or the Flood Risk Assessment (2023) mapping requirements.

There is a high risk of run-off, sedimentation, and hydrological alteration given the compacted surfaces and fencing typical of solar infrastructure. A robust drainage and attenuation strategy, independently reviewed, must be required at EIA stage.

5. Access and Transport

The proposed construction access routes identified within the developer's materials are deeply inappropriate for HGV or abnormal-load use. The indicative routing would direct construction traffic through a network of narrow, rural lanes linking Llangybi, Llanhennock, Ponthir, and Caerleon, none of which are engineered for sustained heavy-goods vehicle (HGV) traffic.

Key issues include:

- Rural Lane Constraints: Carriageways are too narrow for two-way HGV movement, with restricted visibility, limited verges, and insufficient passing points. Swept-path analyses for 16.5 m articulated vehicles have not been demonstrated.
- Structural and Safety Risks: Several local bridges, culverts, and carriageway sections impose weight or width limits. These are unsuitable for construction convoys without reinforcement, yet no such upgrades are proposed.
- Residential and Community Impacts: The routes pass close to dwellings, farmsteads, and local schools, introducing unacceptable safety and amenity impacts from noise, vibration, dust, and verge damage.
- Absence of a Construction Traffic Management Plan (CTMP): The developer's scoping material fails to quantify daily vehicle numbers, peak timings, or route management measures (e.g. one-way systems, signage, or escorting).
- Cumulative Impact: Other regional renewable schemes may share segments of the same network, compounding safety and congestion risks.
- Alternative Routes Not Examined: The Scoping Report provides no evidence that trunk-road or higher-capacity options have been assessed or ruled out.

In its current form, the transport strategy is non-compliant with TAN 18: Transport and inconsistent with Future Wales (Policy 12 – Infrastructure and Connectivity), which requires sustainable, safe access routes that minimise disruption to existing communities.

I therefore request that PEDW requires the applicant to produce a full independent Transport Impact Assessment and Construction Traffic Management Plan at pre-application consultation stage, including:

- Route-specific swept-path modelling and bridge capacity surveys;
- Full HGV frequency and scheduling data;
- Mitigation commitments (banksmen, passing bays, verge strengthening, and condition surveys); and
- A post-construction reinstatement and repair agreement with the relevant local highways authorities.

Without this evidence, the proposed access arrangements are fundamentally unsound.

6. Cumulative and Strategic Considerations

The Candwr proposal must be assessed in the context of the growing concentration of large-scale renewable developments across Monmouthshire and adjacent counties. Cumulative impacts on landscape, traffic, grid infrastructure, and biodiversity connectivity are substantial and cannot be considered in isolation. A regional strategic assessment is necessary to ensure sustainable energy planning consistent with Future Wales Policy 17.

Conclusion

For the reasons set out above, I formally object to the Candwr Solar Farm as currently scoped. The scheme raises fundamental planning, environmental, and transport deficiencies, including:

- Loss of high-value agricultural land;
- Harm to sensitive landscapes and biodiversity;
- Unacceptable transport and access risks; and
- Inadequate consultation and community engagement.

Unless these issues are independently verified and robustly mitigated, the proposal will conflict with Planning Policy Wales, Future Wales, and multiple Technical Advice Notes.

I ask that this representation be acknowledged and fully considered within any forthcoming pre-application consultation.

From: Ieuan Williams <Ieuan.Williams@reading-ag.com>
Sent: 02 November 2025 21:55
To: Jackson, Kevin (Traffic Transport & Development Engineer) <Kevin.Jackson@newport.gov.uk>; Manning, Steve (Senior Scientific Officer) <Steve.Manning@newport.gov.uk>
Subject: Candwr Solar DNS Proposal -Scoping Report

Good evening
I am writing to you in my capacity of vice-chair of the Protect Candwr and Ponthir Countryside Group with regards to the ongoing 305 acre solar proposal known currently as Candwr Solar Farm. I am also vice-chair of Llangybi Fawr Community Council. The site plan is attached for reference purposes. The application is a DNS and will require an Environment Statement
As a group we are totally opposed to the scheme. One of the principal reasons is the impact of HGV and staff traffic to the site over the two year construction period (and deconstruction period after the 40 year permission expires).
In order to access the fields within the site, the applicants propose installing 6kms of hard tracks, which would require some 1,500 lorry loads of stone (8 wheelers)- plus articulated lorry loads of panels, framework bases, fencing materials and CCTVs in addition to inverters and transformers and a new sub-station. It is unfortunate that the developers appeared to assume that site access would be a formality and until we discussed these issues in detail, little was forthcoming on the highways proposals.
The applicants have now submitted a Scoping Report which proposes to scope out Transport and Access, which we consider one of the main issues of the proposal due to the inaccessibility of the site. The Scoping Report proposes a number of routes and the issue of transport and access in the Report states:

"The Proposed Development is situated approximately three kilometres to the north of

Junction 25 of the M4 Motorway. The most direct routes between the motorway junction and the Proposed Development are summarised below:

- A4042, B4236, Candwr Road, Unnamed Roads; and
- B4596, B4236, Candwr Road, Unnamed Roads.

Another construction traffic route to the Site is also being considered, from the north, although it is less direct. This route would bring traffic via Usk from the A449, the A472 and Unnamed Roads.

The solar farm components will be transported to the Site by Heavy Goods Vehicles (HGV), the largest of which will be a 16.5 metre articulated HGV. The smallest possible vehicle for each delivery type will be used where possible. At this stage it is anticipated that there will be two main construction compounds located within the Site. HGVs will deliver to these compounds, where the loads will be decanted. Smaller vehicles (anticipated to be a tractor and trailer) will then transport the plant and materials across the Site.

The construction phase of the Proposed Development would involve changes to traffic movements on the local highway network (e.g. HGVs associated with the site). However, these will be limited to the construction period limited to circa 24 months and are temporary in nature. Appropriate street works notices will be secured as necessary and suitable traffic management measures may be implemented to reduce disruption to background traffic on the local highway network, which will be agreed as appropriate with the local highway authorities in advance of the temporary construction phase. Suitable mitigation measures could include the use of escort vehicles to assist arriving/departing vehicles, banksmen at site access points, temporary signals at constrained off-site junctions and a delivery timetable.

5.10. As part of the proposals new site access points may need to be created but wherever possible existing agricultural accesses will be upgraded to accommodate HGVs. Visibility splays typically suggested for new access points serving new developments (with permanent daily traffic movements) may not be achievable at existing or proposed access points in this location. However, this is to be reasonably expected considering the rural nature and steep topography of the local highway network within the vicinity of the Site and given the temporary and/or infrequent permanent use in the future for the scheme. Suitable temporary traffic management solutions will be proposed within the CTMP as appropriate. These will be agreed with the highway authorities prior to the temporary construction phase.

5.11. Although the exact number of vehicle movements during the construction phase is still to be determined, based on our experience elsewhere we expect during the peak period of the construction phase there could be around 30 HGV movements (i.e. 15 arrivals and 15 departures) per day on average. These movements will be spread across the whole site and will be lower during other points of the construction phase. The movements will include both HGVs and tractors & trailers and the movements by tractors and trailers will be distributing materials around the site; and it is also understood that vehicles of this size/type are already present on the local highway network indicating their size can be accommodated. The total number of movements is low in real terms and will not have a material safety or operational impact on the operation of the local highway network.....

.... A CTMP which will support the DNS application which will provide a review of the local highway network, highway safety within the vicinity of the site, and an assessment of potential impacts of nearby committed developments. A detailed access strategy for the site will be provided and this will incorporate the Routing Plan produced for the public consultation and details on the number and type of delivery vehicles. Due to the rural nature and constraints of the site, a number of temporary traffic management measures, as set out above, will be proposed. The CTMP will be prepared further to scoping discussions with the local highway authorities.

It is therefore considered that the topic of transport, including for construction, decommissioning and operation can be scoped out of the ES due to the low number of vehicle movements in real terms that could be associated with the Site on a daily basis. The temporary impacts of the scheme on the local highway network will be adequately addressed through the submission of separate standalone technical reports which will

accompany the DNS planning application. Significant environmental impacts are unlikely to arise from the Proposed Development, and a Transport and Access Chapter is deemed not to be required within the ES."

I have highlighted the selected routes the developers anticipate taking:

1. A4042, B4236, Candwr Road, Unnamed Roads- this is the Turnpike Road and the road past The Grange Hospital. The proposers have now discounted this road because they realise that the site is inaccessible from B4236 due to the narrow aspect
2. B4596, B4236, Candwr Road, Unnamed Roads- this route comes through Caerleon High Street and the one-way system which is an AQMA, which also passes three schools. Newport CC have generally resisted development traffic along this route and I trust that this will be no different this time.
3. traffic via Usk from the A449, the A472 and Unnamed Roads – this will be of concern to MCC & Usk residents. This passes Usk School and through the High Street and over the Usk Bridge, which has sustained frequent damage in recent years. I understand that most HGVs are prohibited from using this route. The route after Usk is assumed to go through Caerleon, along Station Road and Ponthir Road – both of which are narrow and highly congested in places, with many school children on the pavements, and crossing, along the route.

The Scoping Report is now with Welsh Government /PEDW and they are taking representations from Councils **until 7th November**.

Please could you make a representation to PEDW on this matter to explain that the proposed routes (indeed all routes) to the site are not viable – both in the interests of road safety as well as logistically extremely difficult/impossible. Clearly, Transport and Access would require a standalone Chapter in the ES and should not be scoped out merely due to the fact that they propose writing a CTMP.

We would be most grateful if you could please send any comments in response to the EIA Scoping Consultation for DNS CAS-02366-F2C3K8 - Candwr Solar Farm to PEDW.Infrastructure@gov.wales by 07 November 2025.

Please come back to me if you have any queries
Many thanks in anticipation
Kind regards

[redacted]

READING AGRICULTURAL CONSULTANTS

Reading Agricultural Consultants
Gate House, Beechwood Court
Long Toll, Woodcote, Reading, RG8 0RR
Tel: 01491 684233 Fax: 01491 680800
www.readingagricultural.co.uk
Registered Company Number: 3282982

Mae'r Cyngor yn croesawu gohebiaeth yn Gymraeg, Saesneg neu yn y ddwy iaith. Byddwn yn cyfathrebu â chi yn ôl eich dewis. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

The Council welcomes correspondence in English or Welsh or both, and will respond to you according to your preference. Corresponding in Welsh will not lead to delay.

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Mae'r e-bost hwn yn cynnwys gwybodaeth y bwriedir ar gyfer y derbynnydd yn unig a gall fod yn gyfrinachol, yn destun ragorfraint gyfreithiol neu broffesiynol, neu fel arall wedi'i diogelu rhag cael ei rhyddhau. Os nad chi yw derbynnydd bwriadedig y neges hon, a fyddech cystal â rhoi gwybod i'r anfonwr ar unwaith a pheidio â datgelu, dosbarthu neu gopïo'r e-bost i unrhyw barti arall. Mae'r e-bost hon ac unrhyw ffeiliau atodedig yn eiddo i Gyngor Dinas Casnewydd.

Pan fyddwch yn anfon e-bost at Gyngor Dinas Casnewydd, rydych yn cydsynio i'r Cyngor fonitro a darllen unrhyw e-byst o'r fath at ddibenion cydymffurfio â diogelwch ac â deddfwriaeth. I weld yr ymwadiad llawn ewch i http://www.newport.gov.uk/ymwadiad

PCAC
PEDW
Penderfyniadau Cynllunio ac Amgylchedd Cymru
Planning & Environment Decisions Wales

:

https://llyw.cymru/penderfyndiadau-cynllunio-ac-amgylchedd-cymru | https://gov.wales/planning-and-environment-decisions-wales

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From: Joanne Williams [redacted]
Sent: 05 November 2025 21:18
To: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>
Subject: Candwr Solar Farm Scoping Application DNS CAS- 02366-F2C3K8

To whom it may concern,

I am writing to express my concerns and objections regarding the recent planning proposals for the solar farm near my property, Little Creigydd, Candwr Road, Ponthir.

My home is a Grade 2 listed farmhouse and attached listed barn. The proposal states that the boundary of the site is 35 metres from my house. However, this is incorrect as the actual distance is only 11 metres. I am deeply concerned that the pile driving of 500 piles per hectare could potentially undermine the stability and damage the fragile structure of my ancient property. I am also concerned that solar panels and security fencing within close proximity will destroy the setting of this historic asset.

The access point to parcel 3 is shown, on the map, to be in front of my listed property. The gate way leading off Candwr Lane is situated on a downhill slope and a bend. The topography of the field entrance at this point consists of a steep multi directional slope. The building and use of this access track by the construction traffic at this point will once again severely affect the setting of this listed building.
There is another gateway to parcel 3, further back along Candwr Road which is on a straight flat section.
This issue was pointed out to TotalEnergies representatives at a meeting at the site, following the public meeting. They acknowledged this entrance was impractical and unsafe however have not amended it in the scoping document either due to error or deliberate neglect.

The proposed site and my adjacent land is home to many protected and non-protected species of wildlife, including badgers, bats, red kites, barn owls, lapwings, buzzards, woodpeckers, skylarks, hedgehogs, toads, deer, foxes and dormice, to name a few. Two years of heavy construction on the adjoining land would undoubtedly be detrimental to their well-being, potentially causing them to move away or even perish due to loss of habitat or disturbance.

My husband and I have farmed the land adjacent to the site for over 40 years, conserving wildlife and farming with little fertiliser and very few sprays. It is hypocritical for government policy to promote this type of farming and then accept the destruction of nature and wildlife on over 300 acres of beautiful countryside.

The landscape comprises of grass or arable fields separated by ancient hedges and trees which provide varied habitat for mammals, birds, reptiles, insects, and pollinators. Many of the fields are bounded by large mature trees which will provide shade to the fragmented parcels of solar arrays. The security fences will severely hamper wildlife movement and be visually offensive to the walking public.

Notably the TotalEnergies feedback form, following the public meeting made no reference whatsoever wildlife or birdlife in the section on the environment! Surely this cannot be right when proposing such a devastating development for nature in the countryside.

The loss of 300 acres of productive agricultural land is also very short sighted. In the current increasingly volatile world, it seems exceedingly unwise to remove large tracts of land from farming use when there are brownfield sites and industrial buildings which can accommodate solar panels. This maybe more expensive to install initially but not if farmland and food are required if world events dictate in the future.

Furthermore, the nature of the narrow winding country lanes in the area will cause major disruption to the local community. The roads are single track with few passing places, making it extremely difficult for heavy plant and delivery lorries to navigate at any time, let alone during a prolonged period of solar farm construction.

The Ponthir House pub, which is at the bottom of Candwr Road is Grade 2 listed on Cadw's Historic Asset Register. This will have to be passed by all construction traffic on either side of the ancient building potentially causing severe damage. The narrow right-angle bends into and out of Candwr Road would be almost impossible to navigate by large lorries.

The access via Caerleon is completely impractical. The one-way system is very narrow as well as being a restricted clean air zone. The bridge into Caerleon is listed with a 7.5 tonne weight limit and there are over 50 listed properties on the one-way section alone.
The route through the Ancient Roman Fortress Town passes between the Roman amphitheatre on one side of the road and the Roman Baths on the other! There are also primary, junior and secondary schools on the section of the one-way system that are proposed to be used for the 15 HGV deliveries per day! In the summer, especially, tourists and visitors to the numerous Roman remains ensure that Caerleon town is busy on a daily basis.

The alternative route to the solar site involves passing The Grange University Hospital. This is a critical care hospital covering the whole of the Gwent and South Powys area, some 600 square miles and serving a population of over 600000. Traffic management plans cannot cater for those ambulances and vehicles delivering some 260 emergency admissions per day, without potentially catastrophic results.

The general access to the site seems to be one of the only points raised at the public consultations that TotalEnergies has since thought about and reacted to. They clearly had failed to research the roads and access issues and are now quoting unnamed roads in other areas in attempt to confuse and appear to yourselves that there is no problem. Presumably hoping to push the project through planning and deal with the fallout once there is no going back.

They also failed to notice that a high-pressure gas pipeline crossed a major section of the site, until it was pointed out to them! This appears to be either dangerously negligent or deliberately ignored to ease planning approval. Neither of which suggests that TotalEnergies is a reliable or dependable company for such a project to lease 300 acres of Welsh land to for 40 years.

Candwr Road, the original main access route, is a well-used walking & cycling loop for the local community and residents of Ponthir. The road will be lined by solar panels and the views will be nothing like the current pleasant landscape that offers an escape from today's mentally challenging life. This is after the construction phase during which the road will be inaccessible to walkers and cyclists due to the danger caused by the construction traffic and HGV's.

The roads around the project are also used by horse riders from a livery yard and local properties. The construction phase of the solar project, with heavy plant, lorries and worker's vehicles will be very disruptive to the equine community involved.

The topography of the site is undulating, steep in many parts and large areas are north facing. This is not ideal for a solar farm meaning that panels will have to be at considerable height and awkward angles. I understand that flat land or
south facing slopes of no more than 5° are the norm for solar sites. Many sections of the proposed site barely meet any of these criteria.
The steep slopes and clay soils which make up much of the site represent a major flooding risk for properties lower down the Candwr Brook. The clay soils are difficult to drive on, even with vehicles with low pressure tyres, for significant parts of the winter especially during wet spells. Construction traffic will be unable to operate when the soils are wet. The runoff from the panels will be significant and will accelerate soil erosion as well as flooding. I know this due to farming the land for 4 decades.

The section of the site where I live is also very susceptible to high and damaging winds. They will find that the solar panels are either not where they put them or badly cracked or flexed after a couple of heavy storms. Our property has also been struck by lightning twice! This indicates the exposed nature of this part of the site(Parcel 3)
Once again TotalEnergies promised to arrange wind speed monitoring equipment at the site. Predictably this has not materialised.

The fragmented footprint of the site also makes it visible from many domestic properties and in the wider landscape generally from a multitude of directions.

I understand that the inverters, transformers and fans emit a loud buzzing sound within 100m. We requested that the residential properties on the site will be afforded at least a 100m sacrifice area from such items.

The pile driving is also reportedly very noisy and disruptive. There are many domestic properties that abut the proposed site due to it being in many fragmented land parcels rather than a more normal compact block.

The WHO quote that solar farms should be sited at least 2 km from residential properties. Moreover, I understand that the rule of thumb for exclusion zones for domestic property is 200m for small solar farms and up to 500m for farms of this size. There now appears to be a 50m exclusion area around most domestic properties included in the proposal. In similar proposals locally a distance of at least 75m has been agreed. This would seem an obvious issue to be improved in the proposition if the promise of local consultation is to be taken at face value.

Interestingly, at the open meeting a member of staff advised that one property had requested a larger sacrifice area around their house and that they had been granted a 100m distance from the panels. I cannot see why other domestic properties on the site should not be granted at least this privilege too.

The above points have been brought to TotalEnergies attention on numerous occasions at the public meeting, community council meetings and site meeting. However it seems that, despite many promises that they were listening to the local community, very little has changed from the proposal submitted at the open meeting held in Ponthir Village Hall.
The original scoping application stated that the proposal would have very little affect on the area or the community, which was obviously untrue.
This scoping application seems to be trying to imply that they have interacted with the community and solved any issues. THIS IS NOT THE CASE. There are still all the original unresolved issues which TotalEnergies are refusing to address whilst pretending otherwise.

Residents living along Candwr Road and its locality will be the most affected in the 2 - 3 year construction phase. The inconvenience and extra costs of accessing their properties, inability to sell their homes and drop in property values are major concerns. TotalEnergies have made no attempt to address these issues for the most affected. I understand that suggestions for compensation to homeowners close to large scale renewable sites has been suggested of late as these projects are on such a huge scale nowadays.

I kindly request that you reconsider the seemingly ill thought-out and poorly researched proposals for the solar farm, considering the potential harm to both mine and other property, the local wildlife, the visual impact on the area and the local community.

The practicality of the proposal seems to be hinged on the access to the National Grid provided by the Welsh Water site and the pursuit of profit by a foreign multinational company at the cost of any other practical considerations.

The pursuit of net zero was recently defined by Ed Miliband as the move to home produce renewable energy over which UK government had control to reduce our reliance on costly imported gas. Handing over 300 acres of Welsh farmland to a foreign multinational company for them to make vast profits does not fit this criteria. I cannot see the difference between imported gas and electricity produced by a foreign company!

The welsh coal industry caused severe damage to the Welsh landscape, environment and communities in the past. Welsh Government should be concerned that TotalEnergies are likely to leave the land littered in solar panels, metal and buried cables in the future, once they are of no further use. The decommissioning proposals are vague. They are not set up at the outset of the scheme and they have declared they will not be removing the cabling. If this is allowed lessons of the past will not have been learnt and the environmental and visual disaster of the coal industry will be repeated.

I understand that other letters of concern have been forwarded to you echoing similar views.

I urge you take my comments and concerns into account. This proposal is minimally researched, and local feedback is being ignored whilst attempting to give the impression that locals are being listened to.
Please do not hesitate to contact me to discuss any of the above points if you require any further details. Thank you for your attention to this matter.

Best regards,

Sarah Joanne Williams

Peter Fox OBE MS
Aelod o'r Senedd dros Mynwy
Date:
Member of the Senedd for Monmouth

Senedd Cymru
Bae Caerdydd, Caerdydd, CF99 1SN
[redacted]

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@Peterfox_ms
@PeterFox61
Peter Fox MS

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

Our Ref: PF542

14 November 2025

Dear Sir or Madam

Re: DNS CAS-02366-F2C3K8 - Candwr Solar Farm

We are contacting you as Members of the Senedd of Monmouth and South Wales East, regarding the above proposal for the Candwr Solar Farm.

In recent months, we have both been contacted by numerous residents about this proposal, outlining a number of points and issues that we have considered and taken on board. We have recently been made aware that an EIA Scoping Report was submitted in respect of this application, and as a result, we have seen a sharp increase in correspondence from constituents.

We have been made aware by constituents they feel the report submitted by the developers does not address multiple substantive issues raised by them, businesses and stakeholders, and have asked that PEDW scrutinise the report fully to ensure all concerns are taken into account. Some of the issues that have been brought to our attention about the potential impact of the proposal include:

- Flood Risk – The scoping report proposed ruling this out, despite well documented incidents of flooding.
- Agricultural Land Classification – There is a significant amount of Best and Most Versatile land that is set to be consumed by the project, which does undermine compliance with Welsh Government policy.
- Traffic and Access – Caerleon is designated as an Air Quality Management Area, which prohibits HGV traffic; this would suggest all traffic will need to be routed through Ponthir, causing unnecessary strain on the road network.

Several other concerns have been raised with us, but these are the main topics that are consistently being reported, and that we feel are generating the most anxiety in the community.

Whilst appreciating the role that PEDW have in this process, and noting the planning process that is ongoing, we would be grateful for your acknowledgement of our correspondence, and for reassurance that all community concerns, including those that have been proposed to be 'scoped out' will be considered, before you provide a recommendation to Welsh Government Ministers.

Yours sincerely,

[redacted]

Peter Fox MS for Monmouth

[redacted]

Natasha Asghar MS for South Wales East

MBC
traffic
engineers
&
transport
planners

Protect Candwr and Ponthir Countryside Group

Objection to a Proposal by Total Energies Limited on Land at Court Farm Ponthir

PROPOSED CANDWR SOLAR PARK

ACCESS OPTIONS ASSESSMENT REPORT

Technical Report 44053/1A

January 2026

Mark Baker Consulting Limited

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Registered in England and Wales 6028435
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Introduction

1. This Access Options Assessment Report (AOAR) has been prepared on behalf of the "*Protect Candwr and Ponthir Countryside Group*" (PCPCG). This AOAR's purpose being to assess the access options to a proposed solar farm on land at Court Farm, Ponthir, Monmouthshire being promoted by Total Energies Limited. This has been necessitated in the opinion of PCPCG as the options proposed by the applicant for access both for the workforce and by construction deliveries are opined to be ill considered, and are not considered to be technically robust. The assessments undertaken by the applicant have simply failed to confirm that all types of movement requiring access to the solar farm can be safely accommodated on the local highway network including both by construction delivery vehicles, and by the workforce.
2. The solar farm extends over 118.8ha broadly located 5.2km to the north east of the City of Newport, about 1km east of Ponthir, and of the order of 2.4km to the north of Caerleon where all measurements are from the most southerly point of the proposed Solar Park, to the nearest part of the settlement referred to.
3. The site would be capable of generating about 46MW of electricity. The site is in part adjacent to the Dŵr Cymru Welsh Water Treatment Works (WTW) and a new electricity sub-station us proposed by the applicant within the WTW site. The application site is located within the boundaries of three local authorities namely Monmouthshire County Council (MCC), Torfaen County Borough Council (TCBC), and Newport City Council (NCC).
4. The aim of this AOAR is to provide an independent assessment of the various options for access by all movements including particularly commercial vehicles to deliver materials to the proposal, and to assess in initial detail which access options advocated by the applicant are to be preferred, if any. This report also considers access by the workforce as their access by vehicles either cars or vans whilst being light vehicles will inevitably increase the potential for conflicts and delays on the country lane network providing the "*last leg*" of access route to the solar farm. Once operational there will be no great demand for deliveries to the site save for those that may be required for the largely reactive maintenance purposes, and as such the concerns are during the construction, and the decommissioning phases. Although there could be significant movements during the working lifetime (40 years) of the proposal due to the natural decline in the panel efficiency, thereby requiring the inevitable extensive panel replacement at some stage. This has not been assessed by the applicant. There can be no guarantee that these parts will be delivered by smaller vehicle types.

5. It is important to stress that whilst renewable energy is supported "*in principle*" by national policy that this is not a "*carte blanche*" to override valid transport, landscape or environmental concerns as advised by both "*Planning Policy Wales"* (PPW) and "*Technical Advice Note: Transport"* (TAN18). In due course, a detailed Transport Assessment (TA) will be required, and as appropriate a detailed Construction Traffic Management Plan (CTMP). The need for both being seemingly not disputed by the applicant, and has been variously indicated as being required by MCC, NCC and TCBC.

Request for Environmental Impact Assessment Scoping Opinion

6. The proposal is defined as being a "*Development of National Significance*" (DNS) and as such the applicant had initially engaged, as part of the subsequent planning application process, in an "*Environmental Impact Assessment Scoping Opinion*" (EIASO) with PEDW dated 7th April 2025. The request for the EIASO had been made directly by the applicant to the Planning Inspectorate Wales on behalf of the Welsh Government.
7. The EIASO being prepared by Pegasus Planning on behalf of the applicant. A separate highways report had not been submitted for the EIASO purposes and as such there had been no preliminary or detailed data submitted by the applicant including any assessment of the levels of potential construction vehicle movements, or their impact by road link. This is in our opinion essential in order to assess both the local and wider impact of the proposal during construction of the levels of movements both workforce, and construction related.
8. The EIASO has indicated of direct relevance to this AOAR the following under the heading "*Assessment of Possible Effects*" where a number of themes were assessed viz:

   i) Under the heading "Transport" that:

   > *"The Site will be served from multiple access points into the various parcels of land. Existing access points exist for parcels 3, 4, 6, 8, 10, 11 and 19. A section of track from the Highway to parcel 8 may need to be resurfaced or enhanced to enable construction traffic, but this will be determined through further survey work."*

   The applicant has indicated that of the total parcels that there are 7 parcels each with an individual and direct access onto the adjacent highway that the

parcels are fronted onto which are all best described as being "*country lanes*". It is not clear from this assessment of Pegasus Planning whether any of these existing field accesses are proposed to be used singularly or combined either with or without improvement, and whether any are just for access by the workforce or just for construction vehicles across or both though it is evident that improvements to the local country lane highway network are acknowledged by the applicant to be required at least for parcel 8.

> *"The Proposed Development will result in a temporary change in the number of vehicles using the local and wider road network, although significant levels of traffic will not be generated when compared to most other development projects. Traffic and transportation impacts will be local and limited to the construction and decommissioning periods only. The nature of the operation would involve limited car movement, the only vehicle movements to / from the Site would be from the occasional maintenance vehicle, which would visit the Site approximately bimonthly."*

The reference to limited car movements can only validly relate to the operational or reactive phase as it cannot relate to the 24 month construction period where there will be regular daily movements to the site by the workforce. The car movements reference can only be validly related to that operational period, and to the workforce impact once operational. During construction all deliveries will be by commercial vehicles and there will be significant numbers of workforce movements.

> *"A number of PRoWs cross the parcels of land. The PRoW network will not be directly impacted as a result of the Proposed Development.*
>
> *A Transport Statement and Construction Traffic Management Plan will be submitted as part of the planning application to fully assess and mitigate transport effects. Consequently, it is anticipated there would therefore be no significant effects on (sic) in regard to Transport and Access arising from the Proposed Development that would constitute EIA development."*

It should be stressed that each development proposal that requires planning permission has to be assessed on its merits, and should not be compared to other development proposals to justify their acceptability or otherwise. Just

because another development has been deemed acceptable by the appropriate authority does not provide justification for this development which has to be fully assessed on its individual merits.

Respectfully, a Transport Statement (TS) is not appropriate for this level of development, and a fuller TA should be prepared, and submitted with any subsequent planning application. The TA should directly address the valid concerns of the local community, and the relevant highway authorities.

ii) Under the heading "*Risk of Major Accidents and Disasters*" that:

> *"During the construction phase, the appointed contractor (s) will implement measures in accordance with Health and Safety legislation / requirements, and best practice to minimise the risks of accidents that would have effects on people or the environment. All such measures will form part of the CEMP. In addition, the Proposed Development will not involve hazardous substances, nor does the Site lie within an area at risk from natural disasters.*
>
> *There will be no harmful materials or substances used during either the construction or operation phases. The operation development is not expected to involve the use, transport or production of substances or materials which could be harmful to the environment.*
>
> *Considering the nature and location of the Proposed Development, it is not considered to be vulnerable to or give rise to significant impacts in relation to the Risk of Accidents and Major Disasters."*

It is not accepted that there will be no significant impacts in relation to the Risk of Accidents. The increase in commercial vehicle use on mainly country lanes with limited forward visibility, and limited passing places to accommodate longer commercial vehicles will affect highway safety not only of construction vehicles but all other users of the local network including vehicles both cars, vans and commercial vehicles, horse riders, cyclists, and walkers. The lack of transport of harmful materials does not mitigate against the impact of the proposal during the construction, and decommissioning phases.

For the reasons outlined subsequently in this report, there are significant reservations about whether any of the three options for routing suggested by

the applicant that would result in construction delivery vehicles approaching from the Ponthir Inn direction are logical to various weight restrictions, and as such we assess other options. In essence the only route without weight restrictions is to use the A4042 up to Treherbert Road then to use Treherbert Road. Thereafter country lanes have to be used, and these are all deficient too. **Plates 1 to 8** illustrate typical conditions along the country lanes to the north leading to Treherbert Road including the regular use of the various country lanes by horse riders, and walkers / cyclists. **Plates 1 to 3** show the character of those country lanes to the north of the site leading to Treherbert Road. **Plate 4** shows a typical view of the types of other users of this network of country lanes. **Plate 5** shows a view into one of the country lanes from Treherbert Road. **Plate 6** shows a different type of conflict to **plate 4** namely illustrating that the whole width of the typical country lanes to the north of the site are required for passage by larger commercial vehicles. **Plate 7** shows the conseqauences of vehicles squeezing past in inappropriate locations. **Plate 8** shows that in certain lighting conditions that glare affects the ease of travel. **Plate 9** shows another country lane off Treherbert Road leading to Roughton Farm.

Plate 1: Typical Lane North of Site through to Treherbert Road

Plate 2: Another View of a Typical Country Lane North of the Site with Restricted Width and High Hedges

Plate 3: Limited Forward Visibility along Country Lanes to the North with Passing Place (as shown on left) at Field Accesses but Unable to Accommodate a Long Delivery Vehicle

Plate 4: Horse Riders are Typically Seen on the Country Lanes Around the Site and Leave Limited Width for any Vehicle to Safely Pass

Plate 5: View from Treherbert Road Looking Southwards Towards White House

Plate 6: View of One of the Country Lanes to the Site Showing that the Whole Width of the Lane is Required for Agricultural Vehicles Leaving No Room for Other Movement Types to Pass

Plate 7: Typical Example of Existing Damage to Verges on Country Lanes To The Site

Plate 8: Unnamed Country Lane to Site from Treherbert Road Looking Southwards Towards Roughton

Plate 9: View Along Treherbert Road Looking West at Llandegfedd Crossroads Junction with lane to Roughton Farm on Left

EIA Screening Assessment

9. PEDW responded to the EIASO on the 12th June 2025 indicating under the heading:

> *"Are there any transport routes which are susceptible to congestion or which cause environmental problems, which could be affected by the project?"*

10. The indication being:

> *"Yes.*
> *Monmouthshire County Council (MCC) has expressed concern that the proposal will have a negative impact on the immediate local network and the wider construction traffic network particularly during the construction and decommissioning phases of the development. They note a transport impact assessment would be required. I also note there are a number of nearby residential developments under construction, which could lead to cumulative traffic impacts.*
> *The SR states that a Transport Statement and CTMP will be submitted as part of the planning application to fully assess and mitigate transport effects.*
> *Some impacts would therefore occur during the construction phase. However, these impacts would be temporary and could be managed via a CEMP and CTMP. I therefore do not consider that significant effects are likely."*

11. It cannot be said with confidence that a CEMP and CTMP will adequately allay the valid concerns not only of the group that this report has been prepared for, but the relevant highway authorities, and indeed the wider community including residents of Caerleon itself. In addition, we do not concur that the conclusion "*do not consider that significant effects are likely*" is well founded. The overall assessment in the EIASO response being:

> *"Significant effects unlikely."*

12. The response also contained the detailed consultation responses of the three authorities, though it is acknowledged that only MCC made a detailed response.

13. The response of the relevant authorities indicated "no" from NCC, however MCC indicated:

> *"The proposed scheme is very large extending to approximately 96.73 HA`s with a fenced perimeter of 15. Km utilising a cat (sic) number of fields that are bisected by several public highways. The development is planned to be accessed using existing field access`s and the*

construction of new and is proposed to take approximately 24 months to construct and be operational for forty years before decommissioning."

14. In their opinion, MCC confirmed that:

    "The proposal will have a negative impact on the immediate local network and the wider construction traffic network particularly during the construction and decommissioning phases of the development.

    An EIA is required and will need to be supported with a robust transport assessment and Construction Traffic Management Plan that consider and address the impact of the proposal on the local and wider highway network.

    The applicant has outlined this requirement in the submission,

    The site will also impact the local highway network that falls under the control and jurisdiction of Torfaen County Borough Council, see below an extract of the MCC roads affected.

    A transport impact assessment should be undertaken."

15. There was unfortunately no detailed list of the roads affected attached to the response, and this needs to be explored with MCC. TCBC did not respond to that particular question. It is evident that at least MCC as the main authority affected envisage severe effects on their roads as well as roads of an adjacent authority.

16. There were also a large number of third party objections, and these typically indicate as set out by T S Bishop Esq and Dr Marina Ross that:

    "Extensive transport impacts on an already overburdened local road network during construction, the delivery of solar panels and mounting infrastructure, as well as shipping containers containing electrical equipment via articulated lorries, HGVs, and vans. The villages are popular with walkers, cyclist, pedestrians, and horse riders and are already overburdened and totally unsuitable for large vehicles."

17. Subsequently, following the various initial responses of the various consultees, Pegasus Planning have produced an EIA Scoping Report (EIASR) dated 29th September 2025, and it is prudent to consider this, which had been prepared after the response to the EIASO. As detailed subsequently, it is very unfortunate that the EIASR did not provide a full highways response to the issues raised by the three highway authorities and in particular by MCC, or by any third parties affected either directly or indirectly.

18. The indication is that:

> *"The primary objective for the proposal would be to supply Dŵr Cymru Welsh Water Court Farm Treatment Works with renewable energy via a direct private wire connection."*

19. That operation can only be achieved with the construction of the solar farm. The levels of output, and the other proportion split between the WTW, and the National Grid does not affect any levels of operational traffic, or any levels of construction traffic which are related to the construction of the whole facility. Any benefit that may be attributable to directly supply the WTW with output does not outweigh the negative / severe highway / transport impacts during the construction / decommissioning phases.

20. Paragraph 2.2.5 refers to the specific access points viz:

> *"Access points from the Highway will be used for construction, operation and decommissioning purposes. The proposed access points are from the following field locations: fields 1, 3, 4, 8, 10 and 11."*

21. Paragraph 2.2.7 then indicated:

> *"Access to the Proposed Development is proposed through a mix of existing and new access points for each land parcel. The existing site access junctions will be upgraded and reconfigured to reflect the requirements of the local highways authority and ensure that the visibility splays and widths of the access points are suitable for the Proposed Development. The access route will be used for construction vehicles during construction and once in operation periodic visits from maintenance staff. It will also be used for decommissioning purposes once the facility is no longer in operation. Existing farm tracks will be used for internal access within the Site wherever possible. New access tracks, where required, will be formed, normally using a layer of permeable crushed stone."*

22. Within this commentary, there is no reference to any drawings showing the access highway improvements to any of the parcels of land as acknowledged by the applicant, and no clear indication of whether such highway improvements are wholly on highway land, or require third party land ownership to provide the acknowledged required highway improvements. There is no certainty that any additional land needed to facilitate such required improvements will be available to the applicant. This needs to be clarified by the applicant.

23. Under the heading "*transport*" paragraphs 4.1.24 to 4.1.26 indicated:

> *"A site visit was conducted in January 2025 to review the nature and condition of the local highway network within the vicinity of the Site. This has informed the draft Construction Traffic Routing Plan to be provided for construction and delivery vehicles associated with the scheme. This draft Construction Traffic Routing Plan was included as a presentation board at a non-statutory public consultation event held on 11 July 2025 at Ponthir Village Hall, which was attended by a member of the Pegasus Group Transport team."*

24. This indicates that the access strategy had been informed by a single site visit of an unknown duration. Whilst a presentation board was displayed to the community, there were no detailed assessments of access options, or of the quantum of likely workforce movements, or of construction delivery movements. The response continued:

> *"Work is currently being progressed on a Construction Traffic Management Plan (CTMP) which will support the DNS application. The CTMP will provide a review of the local highway network, highway safety within the vicinity of the Site, and an assessment of potential impacts of nearby committed developments. A detailed access strategy for the site will be provided and this will incorporate the Routing Plan and details on the number and type of delivery vehicles. Due to the rural nature of the highway network and constraints on the site, a number of temporary traffic management measures may be proposed. This could include the use of escort vehicles to assist arriving / departing vehicles, banksmen at site access points, temporary signals at constrained off-site junctions and a delivery timetable.*
>
> *Highways pre-application planning advice will be sought from the local highway authorities of Newport City Council, Monmouthshire County Council and Torfaen County Borough Council, which will seek to agree the extent of the transport work that will be prepared to support the planning submission, it is anticipated that there will be ongoing dialogue throughout the preparation of the transport documents."*

25. The document provided a list of topics, and whether they were scoped out or not, and indicated that "*traffic and transport*" was scoped out for the reason that:

> *"No access improvements likely and therefore not proposed to be scoped out within the ES."*

26. "*Transport and Access*" is considered at paragraphs 5.6 to 5.14 viz:

> *"The Proposed Development is situated approximately three kilometres to the north of Junction 25 of the M4 Motorway. The most direct routes between the motorway junction and the Proposed Development are summarised below:*
>
> - *A4042, B4236, Candwr Road, Unnamed Roads; and*
> - *B4596, B4236, Candwr Road, Unnamed Roads."*

27. It is opined that this is a straight line distance to the nearest parcel of land, and as considered subsequently at paragraphs 64 to 76 where the individual routes are considered, takes no account of the various weight limits that preclude the use of these corridors above by any delivery vehicle over 7.5t, but would not preclude access by cars or vans used by the workforce. Road sign 622.1A being used with plate 620 on the following links, and road sign 622.2 is used on Stokes Drive at the rear of the Ponthir Inn to show the end of the weight restriction.

28. Paragraph 5.7 indicated:

> *"Another construction traffic route to the Site is also being considered, from the north, although it is less direct. This route would bring traffic via Usk from the A449, the A472 and Unnamed Roads."*

29. This corridor is considered at paragraphs 71 to 73, but its advocation also fails to take account of the weight limit restrictions that preclude the use of those inferred corridors along both the A449 and A472.

30. Paragraph 5.8 indicates

> *"The solar farm components will be transported to the Site by Heavy Goods Vehicles (HGV), the largest of which will be a 16.5 metre articulated HGV. The smallest possible vehicle for each delivery type will be used where possible. At this stage it is anticipated that there will be two main construction compounds located within the Site. HGVs will deliver to these compounds, where the loads will be decanted. Smaller vehicles (anticipated to be a tractor and trailer) will then transport the plant and materials across the Site."*

31. The consequence of using smaller delivery vehicles is that it would increase the number of deliveries, but would not ease access constraints as the width of any alternative vehicle is likely to be similar to articulated vehicles such that the consequences of use along country lanes would not be unaltered but potentially doubled.

32. The smaller vehicles referred to being tractor and trailer are only considered to be useful for inter site transport between the various parcels of land. This however till raises concern due to the geographic distribution of the parcels of land and consequentially due to the dispersed distribution of the various parcels that goods will need to be frequently transported from one parcel to another across country lanes, and with no certainty that any access used if existing field accesses are appropriate or designed for such implied likely significant intensification in use. No plans of any access proposed to be used are presented, and as such there is no indication of any removal of hedgerows or trees to achieve appropriate levels of visibility splays.

33. Paragraph 5.9 indicates:

> *"The construction phase of the Proposed Development would involve changes to traffic movements on the local highway network (e.g. HGVs associated with the site). However, these will be limited to the construction period limited to circa 24 months and are temporary in nature. Appropriate street works notices will be secured as necessary and suitable traffic management measures may be implemented to reduce disruption to background traffic on the local highway network, which will be agreed as appropriate with the local highway authorities in advance of the temporary construction phase. Suitable mitigation measures could include the use of escort vehicles to assist arriving/departing vehicles; banksmen at site access points, temporary signals at constrained off-site junctions and a delivery timetable."*

34. The consequences are temporary over a two year period, and potentially on a frequent daily basis within that period. It is not likely to be realistic that all individual vehicles will be escorted to the site, and there is no indication of any holding areas for vehicles awaiting escort, which logically can only be on or directly off the strategic highway network. This is a fundamental problem with accessing this relatively isolated country site. If public laybys are proposed for such holding areas there can be no guarantee that these will be available, and free for construction vehicles during the 24 month construction period. Furthermore, any use of such public laybys will deprive other users of the highway the ability to take a "*break*" which could overall compromise highway safety. Paragraph 5.10 indicated:

> *"As part of the proposals new site access points may need to be created but wherever possible existing agricultural accesses will be upgraded to accommodate HGVs. Visibility splays typically suggested for new*

> *access points serving new developments (with permanent daily traffic movements) may not be achievable at existing or proposed access points in this location. However, this is to be reasonably expected considering the rural nature and steep topography of the local highway network within the vicinity of the Site and given the temporary and/or infrequent permanent use in the future for the scheme. Suitable temporary traffic management solutions will be proposed within the CTMP as appropriate. These will be agreed with the highway authorities prior to the temporary construction phase."*

35. This is an implicit acknowledgement that appropriate levels of visibility splays may not be achievable which will compromise highway safety even if only for the temporary construction period of 24 months. Any location that is proposed to be intensified in use should have speed surveys undertaken to establish the existing speeds to determine the appropriate levels of visibility splays using the guidance in TAN18. The splays are not just for commercial vehicles but also potentially for the workforce, and it is likely where an existing field access is used that removal of lengths of hedges / hedgerows will be required. This may raise ecological concerns. Paragraph 5.11 indicated:

> *"Although the exact number of vehicle movements during the construction phase is still to be determined, based on our experience elsewhere we expect during the peak period of the construction phase there could be around 30 HGV movements (i.e. 15 arrivals and 15 departures) per day on average. These movements will be spread across the whole site and will be lower during other points of the construction phase. The movements will include both HGVs and tractors & trailers and the movements by tractors and trailers will be distributing materials around the site; and it is also understood that vehicles of this size/type are already present on the local highway network indicating their size can be accommodated. The total number of movements is low in real terms and will not have a material safety or operational impact on the operation of the local highway network."*

36. The applicant appears to relate impact solely to be the levels of additional vehicles but fails to acknowledge that along the country lanes providing the access to the site as the "*last leg*" that restricted forward visibility, restricted road widths, and the lack of any formal passing places save for at field accesses means that where and when another vehicle is met or non-motorised movement not that the available width means that it is

highly likely that simultaneous passage will not be possible. One vehicle will need to reverse to a passing place if one can be located, and verge damage will follow. A reverse by a vehicle will compromise highway safety due to restricted forward visibility. **Plate 6** shows that in places the country lanes are not wide enough to accommodate other than a single vehicle width. **Plate 7** shows existing damage to verges due to such overrunning that will only be exceeded by the intensification in use due to workforce vehicles, or construction vehicles. Paragraph 5.12 indicated:

> *"Once operational the only trips associated with the Site would be occasional maintenance vehicles, anticipated to consist of a 4x4 or van type vehicle. It is anticipated that there would be one maintenance trip every two weeks. The vehicle movements associated with these visits would also not be considered to have a material impact on the operation of the local highway network."*

37. Paragraph 5.13 indicated:

> *"A CTMP which will support the DNS application which (sic) will provide a review of the local highway network, highway safety within the vicinity of the site, and an assessment of potential impacts of nearby committed developments. A detailed access strategy for the site will be provided and this will incorporate the Routing Plan produced for the public consultation and details on the number and type of delivery vehicles. Due to the rural nature and constraints of the site, a number of temporary traffic management measures, as set out above, will be proposed. The CTMP will be prepared further to scoping discussions with the local highway authorities."*

38. This appears to be an acceptance that a routing strategy will be fraught, and this is confirmed by this AOAR. The site itself cannot be safely accessed either by the workforce during construction, or by delivery vehicles themselves without compromising safety. The final paragraph 5.14 on the theme of "*Transport and Access*" indicating:

> *"It is therefore considered that the topic of transport, including for construction, decommissioning and operation can be scoped out of the ES due to the low number of vehicle movements in real terms that could be associated with the Site on a daily basis. The temporary impacts of the scheme on the local highway network will be adequately addressed through the submission of separate standalone technical reports which*

will accompany the DNS planning application. Significant environmental impacts are unlikely to arise from the Proposed Development, and a Transport and Access Chapter is deemed not to be required within the ES."

39. Transport and access is a fundamental issue that if not addressed in the ES will need to be fully considered in the robust TA subsequently required. As such, it could be considered unfortunate and erroneous, that the applicant has decided to scope this out of the ES as to consider it at the ES stage could avoid abortive work.

Scope of this AOAR

40. In preparing this AOAR, we have undertaken a number of detailed site visits whereas the applicant appears from paragraph 4.1.24 to have only undertaken one detailed visit to inform their access proposals. We have driven around the various country lanes, and principal roads that have been variously indicated as being potentially "*suitable"* for access to the site by both the workforce, and by commercial vehicles. At this stage we have not had any detailed discussions with any highway officer at any of the three highway authorities namely NCC to the south, TCBC to the west, and MCC to the north and east. However, PCPCG have been productive in this regard. As a concerned group, PCPCG have sought to engage with all relevant parties.

41. The AOAR is assessed by reference to the three potential strategic options suggested by the applicant namely:
    i) The M4 from junction 25 using the B4596 corridor,
    ii) The A4042 corridor from either M4 junction 25a or junction 26, and
    iii) The A449 / A472 corridor.

42. This AOAR provides initial advice and initial consideration of the various access / routing options for access by construction vehicles.

43. The site is spread over a number of discrete parcels of land with 13 individual parcels of land. It is understood that the main compound for deliveries of all construction materials will be from Candwr Road as advised by PCPCG or from any of the various parcels of land onto the various country lanes though this is not acknowledged by any of the applicants' reports. It is not specified whether there will be a central delivery compound, and no specification of the proposed workforce car park. Access to the solar park may be proposed from a single point of access but in that case, there will be consequentially be vehicles having to cross the various country lanes travelling from

one parcel to another to transport construction materials after their initial stockpiling if this is the proposed mode of operation.

44. Although the exact locations of the sources of the deliveries are not known at this stage it is highly likely that there will be a large number of different vehicles daily travelling to the site i.e.: the deliveries will not be restricted to a small number of vehicles driven by drivers that will become familiar with the area but conversely delivery vehicles will be driven by drivers that will not be fully familiar with the local highway network.

Structure of this AOAR

45. This AOAR is structured as follows to address potential issues of concern based on our detailed experience of such solar farm proposals across the UK:
    i) Paragraphs 46 to 59 consider the traffic movements likely to be associated with the construction of the solar park, and those movements during the ongoing operation of the solar park, which will include regular inspections, regular maintenance, and as required reactive maintenance, although the principal concerns are the movements during the construction phase, repairs and renovations, and similarly decommissioning, though that will be at least 40 years henceforth,
    ii) Paragraphs 60 to 76 consider the access / route options for construction vehicles to the site based on the three corridors suggested by the applicant, which are all in our opinion compromised, and
    iii) Paragraphs 77 and 78 present the summary and conclusions of this AOAR.

Traffic Types

46. Construction of the solar park would require the delivery of items of plant and equipment to the site in addition to the delivery of materials. During construction, traffic associated with the solar park can be broadly split into three main categories viz:
    - Construction workforce movements;
    - Delivery of construction plant / equipment; and
    - Delivery of the solar park plant / equipment / materials.

47. All three elements are of concern to PCPCG due to the potential for additional conflicts, and delays that compromise highway safety. In order to assess access options, it is prudent to consider at the outset the potential quantum of movements for all three categories above. As these will affect any access / routing options that may be considered appropriate by the applicant.

Construction Employee Movements

48. Although the impact of the larger construction vehicles is the main concern, the impact of car or van borne arrivals and departures cannot be dismissed as the main local roads used to provide the "final" links to the solar park are all largely single track e.g. lanes with a very limited number of passing places, and limited forward visibility, and as such even access by the workforce will lead to inevitable additional conflicts, and delays detrimentally impacting upon highway safety.

49. In terms of construction workforce movements, the "*worst case*" would be that all vehicles would arrive during the morning peak hour and leave during the evening peak hour. However, based on the likely construction work hours (Monday to Friday 08:00 to 18:00 and Saturdays 08:00 to 13:00), it is likely that the vehicle movements associated with construction of the proposed solar park would overlap with the usual network peak hours. There is no indication yet by the applicant as to the quantum of the workforce, and whether there will be a robust Travel Plan to ensure that single occupancy car use is restricted.

Plate 10: Bridge Street Usk

50. Construction staff vehicles will have to park at a temporary site compound / laydown area (i.e. on a dedicated area of the proposed site). This is not yet defined, but it is essential to avoid the potential for construction staff vehicles blocking any country

lanes in the vicinity of the proposed solar park site. As there are a large number of parcels, it is inevitable that there will be internal trips generated within and between the various parcels that will require increased crossings of country lanes where the levels of visibility and adequacy of the field accesses are not known.

51. The magnitude of any change would, it is acknowledged, be negligible in the context of the total traffic flows on the strategic road network including the M4, A4042, A449 and A472 whose purpose is to facilitate longer distance travel by all vehicle types though typically for A roads there are a variety of types ranging from high quality dual carriageway to A roads through towns. As such, it is opined, that the potential impact due to the construction workforce would be negligible on the strategic road network, and on some links such as the M4, A4042 and A449 would also not be significant or severe but that would in our opinion not apply to the A472 through the centre of Usk as shown on **Plate 10**.

Construction Vehicles

52. The commercial vehicle construction traffic has two main elements namely the movements of commercial vehicles to facilitate the construction of the site in terms of internal access roads, and the movement of commercial vehicles to deliver materials to the site for the construction of the solar park. This AOAR has not provided an assessment by month as the applicant / contractor will need to determine whether deliveries will be stockpiled on site or whether there will be "*just in time*" deliveries. It is however likely that any access roads will be one of the first phases of the construction process.

Construction Plant Movements

53. Construction plant / equipment (i.e. excavators, compactors and generators) will be delivered to the site by low loaders. This construction plant / equipment will be likely to be delivered to site in the first few weeks of the construction programme, such that the access tracks and the temporary site compound / laydown area can be constructed and the delivery of the solar park plant / equipment / materials can then follow / begin.

54. The timings of construction traffic movements would need to be restricted to between 08.00 and 18.00 in the interests of overall residential amenity. School pick up and drop off times in Caerleon would need to be factored in to vehicle movements as part of the site's construction management plan. At the time of preparing this AOAR there are no

improvements to the local network proposed to ensure that all construction vehicles can be passed by other vehicles along any routing corridor defined.

Summary of Construction Vehicle Movements

55. It can be anticipated that deliveries would be spread throughout the working day. In our opinion, in any assessment of impact the quantum of the levels of movements by constriction vehicles is important to assess. The applicant has indicated the equivalent of the order of 2 deliveries per working hour or 2 arrivals and 2 departures per hour, which would only occur over the 24 month construction period. The duration of the construction phase does not temper the issues of concern to PCPCG.

Operational Vehicle Movements

56. During the operation of the solar park, the site will be visited to ensure the equipment is working correctly, to undertake routine visual inspections and to undertake general maintenance activities (i.e. grass cutting / strimming). Reactive maintenance visits are likely to be limited and infrequent (with an anticipation of approximately twice every month), and will therefore require very few traffic movements. Vehicles will park on site, and will not block any roads in the vicinity of the proposed solar park.

Decommissioning Vehicle Movements

57. During the decommissioning of the site, the decommissioning constriction traffic can be broadly split into three main categories. These categories are:
    - Decommissioning workforce movements;
    - Delivery of decommissioning plant / equipment; and,
    - Removal of solar park plant / equipment.
58. The traffic generated during decommissioning would be likely to be higher than those levels that are generated during the initial construction because the materials that are taken off the site at the end of the proposal's lifespan are not likely to be as economically packed as initially shipped from factory conditions.

Construction Traffic Impact

59. The applicant has indicated 2 vehicle movements per working hour or 2 arrivals and 2 departures per hour of which all will be on country lanes that are single track with limited passing places, and limited forward visibility in places. Whilst the level of movement is likely to be well within the daily variation in traffic movements along the

M4, A4042, A449 and A472, and will not be noticeable to the average motorist on these routes. It would be noticeable on the narrow country lane network as the "f*inal leg*" of the journey, or as the "*first leg*" after delivery drop off.

Plate 11: Articulated Lime Delivery Vehicle to WTW

Access / Routing Options

60. The exact location of the PV panel and inverter / transformer manufacturers will not be known until after the granting of planning permission, and the subsequent award of the various construction contracts.

WTW Use of Country Lanes

61. It is acknowledged that the route along Candwr Road past the Ponthir Inn is already used by agricultural traffic and by Dŵr Cymru articulated vehicles delivering to the WTW. It is understood the deliveries of lime to the WTW are only once per week. This is considerably less than the two vehicle movements per hour, or two arrivals, and two departures per hour every single day of construction over its 24 month period.

Plate 12: Lime Delivery to WTW Passing Along Candwr Road in Vicinity of the Ponthir Inn

Plate 13: Access Corridor to Water Treatment Works

62. **Plate 11** shows the typical delivery vehicle for the lime product. The vehicle illustrated by **plate 11** is rear steering which offers a tighter swept path than a typical articulated vehicle. **Plate 12** shows the lime delivery vehicles travelling along Candwr Road in the vicinity of the Ponthir Inn showing that with parked cars that all of the available road width is used. **Plate 13** shows the country lane providing access to the WTW from Candwr Road. This view should be compared to **plates 1 to 5** and clearly indicates its superiority. In other words, although the WTW is accessed by rear steering articulated vehicles the country lane directly feeding the WTW is superior to those to the north of the site up to Treherbert Road in that it's both wider, has a more "*open"* character, and has intervisible passing places. The operation of vehicles as previously detailed is fundamentally different.

63. In reality, assuming a working day of 08.00 to 16.00 with eight hours of deliveries could lead to 80 deliveries per week or 80 arrivals and 80 departures per week compared to the one delivery per week for the WTW i.e.: during construction period there would be an eighty fold increase over the WTW levels. The levels of movement by articulated vehicles would not be xx to the WTW by this proposal.

Route Options

64. This AOAR now considers the choice of the three access corridors for assessment purposes. This is to assess the potential access to the solar park to demonstrate that "*safe and suitable*" access simply cannot be achieved onto both the local in particular and for some options also onto wider strategic highway network. It is prudent to consider each of the main options.

Route Option 1

65. This is the route from the A4042 east of Cwmbran then the B4236 arriving at the solar farm generally from the Llanfrechfa direction. Traffic from M4 east would leave the M4 at junction 25a and then route along the A4042 skirting Malpas. Traffic from the M4 west would leave at junction 26, and travel along the A4051, Malpas Road which whilst dual carriageway has extensive frontage development, largely residential from junction 26 to the junction north of Malpas where a spur of the A4051 connects to the A4042. The A4042 is a dual carriageway road to the B4236 at Llanyravon and as such is suitable for use by even the largest of construction vehicles, but the issue is the next leg of the journey from the A4042 through to the site.

66. The B4236 has a blanket "*7.5t weight limit except for access"* that extends through to Caerleon, and ends at Candwr Road and Stokes Drive. As such, to access the site using this route means violating the posted weight restriction for all vehicles used that are over 7.5t. Beyond Stokes Drive, and Candwr Road to the north of the Ponthir Inn there are various areas of concern.

Route Option 2

67. This is the route from M4 junction 25 then the B4596 and the B4236. The route passes through extensive frontage development along Caerleon Road at St Julians before passing over the River Usk on the southern boundary of Caerleon. As shown on **Plate 14**, the River Usk bridge has a weight restriction precluding the realistic use of this corridor by any delivery vehicle over 7.5t.

68. The route then passes through Caerleon town centre on a one way loop including passing outside the Infants and Junior schools with a large secondary school occupying the site further to the west, and through the AQMA as shown on **plate 15**. The effect of these schools is to lead to localised congestion between 08.00 and 09.00 for school drop offs, and between 15.00 and 16.00 for school pick-ups. The addition of construction delivery traffic either commercial vehicles or workforce cars or vans will

inevitably add to the delays and congestion at both of these periods compromising the safety of vulnerable types of pedestrians. This assumes that commercial vehicles would be permitted within Caerleon despite the weight limit.

69. It is understood that the wider community has strenuously sought to restrict unnecessary commercial vehicle access except where having no other alternative other than through the historic heart of Caerleon with its narrow streets bound by the ancient walls, and due to the conservation area with a number of sensitive listed buildings.

Plate 14: Usk River Crossing South of Caerleon Centre

Plate 15: Caerleon High Street

70. The route meets the B4236 at a mini roundabout with Station Road (B4236) to the north, Mill Street to the south, and Usk Road (unclassified) to the north east. The first section of Station Road is characterised by high levels of parking, but the B4236 from Caerleon to Candwr Road at Ponthir is subject to "*7.5t weight restriction except for access*". As such, to access the site using the route means that delivery vehicles would violate two posted weight restrictions for all vehicles used that are over 7.5t.

Route Option 3

71. The ES at paragraph 5.7 indicates:

> *"Another construction traffic route to the Site is also being considered from the north, although it is less direct. This route would bring traffic via Usk from the A449, the A472 and Unnamed Roads."*

72. This route leads from the A449 through the centre of Usk with retail units fronting it, and then routes over the River Usk but this route has a weight restriction over the River Usk, and similarly if using the A472 from the A4042 there is a blanket "*7.5t weight limit except for access*" from the west of Little Mill through to Usk. To access using this route means violating one of two weight limits.

73. From Usk, an unnamed road leads through Llangybi entering Caerleon at the B4232 mini roundabout. **Plate 16** shows the high levels of parking at the junction approaches

with the mini roundabout in the distance. The mini roundabout will pose constraints / difficulties for commercial vehicles travelling either to the site turning from Usk Road, or from the site turning into Usk Road. As such, to access the site using the route means that delivery vehicles would violate two posted weight restrictions for all vehicles used that are over 7.5t.

Plate 16: Usk Road on Approach to B4232

Local Highway Network

74. In our opinion, none of the three routes can be considered suitable for construction vehicles even with any improvement and even subject, if required, to banksmen controlling access. All three of the routes have at least one weight restriction that would need to be violated to gain access. An alternative is a variation of option 1, but continuing along the A4042 to the Treherbert Road roundabout. There are no weight restrictions on this route, but as shown on **plate 17** the width of Treherbert Road does not allow two-way simultaneous flow by commercial vehicles. The absence of centre line road markings verifying this. The length of the road that would need to be controlled by banksmen is excessive, and unrealistic. There would still be an issue of access using country lanes as illustrated by **plates 1 to 9** which is considered at paragraph 76.

Plate 17: View Along Treherbert Road Showing Absence of Centre Line Markings

Plate 18: Parked Cars Along Candwr Road In the Vicinity of the Ponthir Inn

Roads in the Vicinity of the Ponthir Inn Junction

75. Using any of the route options 1 to 3 means eventually arriving at the Ponthir Inn, and having then to negotiate along Candwr Road. Paragraphs 61 and 61.2 have assessed the use of this route by WTW vehicles. There are existing levels of parked cars at the junction as shown on **Plate 18**, but guidance does not prohibit this. It is not indiscriminate but associated with frontage development as it is understood that parked cars occur in this location due to the lack of off-street parking for the various frontage properties. This cannot be controlled by the applicant without impinging upon affected residents for the applicants indicated 24 month construction period. A standard HGV requires a 15m radius, the width of the B4232 / Candwr Road junction is such that with parked cars on one side of the road up to the Stokes Drive junction means that an HGV will not be likely to safely negotiate the turn onto Candwr Road from the B4232, or vice versa., or alternatively onto Stokes Drive. This assumes that such construction vehicles will have violated the 7.5t weight limit except for access. **Plate 19** shows Candwr Road north of Stokes Drive, and **plate 20** a view slightly further to the north showing other typical users of Candwr Road.

Plate 19: Candwr Road north of Stokes Drive

Plate 20: Other Users Typically Seen on Candwr Road

Routes South of Treherbert Road

76. **Plates 1 to 9** illustrate typical conditions along country lanes to the north leading to Treherbert Road including the regular use of the various country lanes by horse riders and walkers / cyclists. **Plates 1 to 3** show the character of those country lanes to the

north of the site leading to Treherbert Road. **Plate 4** shows a typical view of the types of other users of this network of country lanes. **Plate 5** shows a view into one of the country lanes from Treherbert Road. **Plate 6** shows a different type of conflict to **plate 4** namely illustrating that the whole width of the typical country lanes to the north of the site are required for passage by larger commercial vehicles. **Plate 7** shows the conseqauences of vehicles squeezing past in inappropriate locations. **Plate 8** shows that in certain lighting conditions that glare affects the ease of travel. **Plate 9** shows another country lane off Treherbert Road leading to Roughton Farm.

Summary

77. This AOAR has provided detailed information regarding the potential traffic and infrastructure impacts associated with the proposed solar park based on data provided by using their detailed knowledge of various solar park sites. The potential impact resulting from the development of the proposed solar park would be related to:
    - The access arrangements for the construction / operation / decommissioning of the proposed solar park;
    - The traffic generated as a result of construction / operation / decommissioning of the proposed solar park; and
    - The location of the proposed solar park and the effect of it on other movements using existing roads / public rights of way.

78. For each of these potential impacts, this AOAR has demonstrated that:
    i) The environment and amenity in both the local and wider network area surrounding the proposed solar park would be severely affected by traffic resulting from the development of the solar park,
    ii) The existing infrastructure will not be able to accommodate the development of the solar park even with localised highway improvements if acceptable to any of the highway authorities,
    iii) It is opined that any of the routes advocated by the applicants are simply not suitable to accommodate the levels of construction vehicles of two arrivals and two departures per day in a potential 24 month construction period due to the inevitable conflicts due to the types of vehicles on the "*last leg*" of the journey, and
    iv) The roads as the "*final leg*" of any delivery route option are simply not suitable on either a daily or hourly basis even with any improvements if they could be defined.