



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Date Dyddiad 10th July 2023
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Contact Cyswllt Nicola Lake
Your ref Eich cyf
Our ref Ein cyf P2023/0498

Adeline Wilcox
PEDW
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Dear Sir/Madam

Town and Country Planning Act 1990

PROPOSAL: Consultation Request from DNS Team - PEDW in relation to a Screening Opinion for the proposed 50MW ground mounted photovoltaic solar farm with associated equipment, infrastructure, grid connection and ancillary works.

LOCATION Mynydd Emroch Penycae Neath Port Talbot

APPLICANTS Adeline Wilcox

NAME/ADDR: Crown Buildings Cathays Park Cardiff CF10 3NQ

I write regarding the consultation request in relation to the screening opinion for the above proposed DNS development.

The proposed development seeks permission for an extension to an existing solar farm rather than permission for a new solar farm. The applicant's screening report states that the site would have an area of 72.3ha across 4 parcels of land. The proposal would appear to surround the existing solar farm on three sides (to the east, south and western sides). During the course of the determination of the original planning permission some of these parcels of land were removed from the scheme due to their impact upon the visual amenity of the wider area. Any application submitted would have to consider the visual and landscape impacts associated with what would be a highly visible and prominent location which would be visible from all of the immediate and wider surrounding communities.

On the top of page 3 the screening report states "A wind farm is located on the elevated plateau to the south of the site and Port Talbot Steel Works are located in the valley which is clearly visible from the site." Port Talbot Steel Works is located on the coastal plane, not in a valley area and due to the application site's significant elevated position most development within the area would be visible from it. The mountains are very dominate features when viewed from the low lying settlements of Port Talbot,

Margam, Aberavon and Sandfields. Despite these settlements being densely developed with residential, commercial and heavy industry, the mountains are a constant reminder of the natural environment that is just a short distance away. The importance of this landscape is reflected in its designation as a Special Landscape Area. While a windfarm, an existing solar farm, telecommunications apparatus and pylons have been constructed on these mountains they remain predominantly green and undeveloped. The constant erosion of this vital function through recent development has not completely erased this important feature. However further development must clearly and comprehensively justify, rather than just dismissing their importance.

The applicants have not specified any proposed battery storage facilities within the proposal which is a little unusual but noted, however there are large number of solar farms being proposed with the Authority's area, the majority of which are proposing battery storage, which now appears to be central part to such development. The Authority would not wish to see battery storage facilities subsequently retrofitted into the development at a later date, without allowing a comprehensive assessment at this stage. While the Authority of course understands the development must be considered as submitted, perhaps some information could be provided as to why battery storage is not part of the development, to help provide clarification why it will not be added to the development at a later date.

However it is also noted that the proposed additional/new/replacement pylon has not been included within the description of development. Will this not be part of the proposed development and subject to a separate application process? There are no submitted details of the pylon such as height.

Under section b) of the Characteristics of Development it states "Whilst there is potential for cumulative effects with the existing solar farm, the topography and in-situ vegetation reduces the likelihood of any potential impacts." As stated a number of the parcels of proposed development area were removed from the planning application for the existing solar farm due to their highly visible nature. Small section of the existing solar farm are already visible from the low lying area, the addition of these more prominent location is highly likely to result in a cumulative impact when considered together with the existing solar farm, as well as the addition of a new/replacement/additional pylon. These impacts must be fully and comprehensively assessed and not dismissed.

The statement continue on to state that the land would continue to be used for albeit a reduced agricultural purpose however there is no information identifying the grade of the agricultural land to inform the potential impact of the proposed development.

In relation to statement e) of the Characteristics of Development the applicants state that "The development would not create pollution or nuisance given the nature of the equipment proposed on site". There is very little information provided to support such a sweeping statement. With no information provided in relation to the visual impacts, the impact upon biodiversity, the impact through glint and glare or the impact upon agricultural land. Similarly, no information has been provided in relation to the other plans and projects for energy generation, especially the solar developments that are currently passing through the DNS process and which are currently in the public dominate and have the potential for cumulative impacts with this proposal.

While the planning permission is seeking consent for a 40 year period there is no reason to believe that green energy would no longer be required after 40 years. Current permitted solar farms were given 25 years but are currently seeking amendments to increase these time periods.

No information has been provided in relation to site selection or site alternatives.

As such and for the reasons as set out above, the Authority would recommend that the development is considered to be EIA Development and that any application submitted should be supported through the submission of an Environmental Statement setting out the finds of the EIA.

Should you require any further assistance please contact Nicola Lake on the case officer number above.

Yours faithfully

Ceri Morris

HEAD OF PLANNING & PUBLIC PROTECTION

If you require this information in larger print, or in an alternative format, please contact the above named officer.