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Dear Gareth,

Town and Country Planning Act 1990
P/25/0044 | Solar Farm and associated equipment and cabling | Pen Y Dre High School Goitre Lane
Gurnos Merthyr Tydfil CF47 9BY

Asbri Planning is appointed as planning agent to Merthyr Tydfil County Borough Council in respect of the above planning application for a proposed solar farm, cabling and associated works.

A revised set of landscape details has been prepared following receipt of comments from the Ecology officer which includes:

- Green Infrastructure Statement;
- 2488501 - SBC - 00 - XX - DR - L - 202 - Site Green Infrastructure Plan [P04]
- 2488501 - SBC - 00 - XX - DR - L - 401 - Strategic Landscape Plan [P04]

The updates have accounted for additional planting mitigation and enhancement including:

- Additional proposed scrub blocks: +1240m²
- Additional native hedge: +401m²/+196m length.

The proposals numerically show a loss of scrub habitat as indicated by the Ecology Officer. However, this does not fully consider the context of the development. The amount of permanent habitat loss within the solar farm site will be limited to the building compound footprint, access track and turning area around the infrastructure compound. The PV array will be mounted on a frame and fixed to the ground using ground screws. The amount of direct habitat loss attributed to the PV units is therefore considered to be minimal given these will be off the ground allowing habitat to coexist beneath. The submitted PV array elevation and section demonstrates arrays will be 868mm above ground at the lowest point. Following construction the areas beneath the solar arrays will be allowed to re-grow albeit the contractors will follow ecological sensitive practices as will be set out in the Construction Environmental Management Plan.

The solar farm will fundamentally underpin the Pen Y Dre High School, the new Goetre Primary School, the Prince Charles Hospital and the Bishop Hedley Campus's ability to conserve natural resources, minimise carbon generation and help deliver zero carbon standards by providing a significant level of renewable energy. The proposed development will contribute to Merthyr Tydfil's and Welsh Government of the public sector to be carbon neutral by 2030.

The Ecology Officer has requested that a Long Term Management Plan is secured for the proposals. This will demonstrate how retained habitats will be managed to provide Biodiversity Betterment alongside management of proposed planting. This can be secured via a planning condition.

The proposals are strongly supported by Future Wales policy 17 which states:

"The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs.

In determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency."

This policy within Future Wales acknowledges that **significant** weight must be afforded to the need to meet Wales' international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency.

Overall whilst the proposal will result in some loss of habitat the majority of the impacts will be temporary in nature due to the likely restoration of the land and the fact that the solar arrays do not physically alter the ground beneath them. The proposals will provide 3 to 1 tree replacement and a significant area of native hedgerow planting. The proposals will also provide indirect environment enhancements through the reduction in energy use by the facilities it supports.

In conclusion it is considered that the proposals will provide a Net Biodiversity Benefit to the site and area through implementation of new planting, long term management and will provide a significant reduction in carbon demand for the 4 no. public buildings the solar will support. The GI has been further enhanced from the original planning submission and will strengthen and diversify the current GI assets and provide the opportunity for a more climate change resilient matrix of beneficial and diverse GI components. The proposals therefore comply with both national and local planning policy.

Yours sincerely,



Liam Griffiths
Principle Planner