

PLANNING, DESIGN & ACCESS STATEMENT

**Land at Pen-Y-Dre High School, Merthyr
Tydfil, CF47 9BY**

January, 2025



T: 029 2073 2652

T: 01792 480535

Cardiff

Swansea

E: mail@asbriplanning.co.uk

W: www.asbriplanning.co.uk

Description of development:
Proposed solar farm, cabling and associated works

Location:
Land at Pen-Y-Dre High Comprehensive School, Merthyr Tydfil, CF47 9BY

Date:
November 2024

Asbri Project ref:
24.143

Client:
Merthyr Tydfil County Borough Council



Asbri Planning Ltd
Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS

T: 029 2073 2652
E: mail@asbriplanning.co.uk
W: asbriplanning.co.uk

	Prepared by	Approved by
Name	Iestyn Richards, <i>Student Planner</i>	Liam Griffiths, <i>Senior Planner</i>
Date	January 2025	January 2025
Revision	A	A

Section 1	
Introduction	4
Section 2	
Summary of the proposal	4
Section 3	
The brief and vision	4
Section 4	
Site Context and analysis	6
Section 5	
Interpretation	8
Section 6	
Design development	10
Section 7	
The proposal	15
Section 8	
Planning Appraisal	18
Section 9	
Conclusion	20

SITE IN REGIONAL CONTEXT



INTRODUCTION

Introduction

1.1 The purpose of a Design & Access Statement (DAS) is to provide a clear and logical document to demonstrate and explain the various facets of design and access in relation to the site and to appraise the proposed development against relevant planning policies. It also presents the details of a planning application in a way that can be read both by professionals and the public.

1.2 The diagram below, extracted from Chapter 3 of Planning Policy Wales, summarises the five objectives of good design that should be taken into account when preparing a DAS. The circular nature of the diagram represents the equal weightings that need to be given to each of the 5 Objectives of Good Design: Access; Movement; Character; Environmental Sustainability and Community Safety.

1.3 The submitted Design and Access Statement adheres to guidance embodied in the Welsh Government publication, Design and Access Statements in Wales, published in June 2017.

1.4 This statement also considers relevant planning policy and considers the development proposals in a planning appraisal.

1.5 The statement is subdivided into eight sections, commencing with a brief summary of the proposal in section 2. Section 3 outlines the brief and vision for the project, whilst Section 4 provides a brief overview of the site context and analysis. Section 5 interprets and applies the context of the brief and vision for the site, whilst section 6 summarises how the design has developed following consultation. Section 7 sets out the proposal, explores the relevant design and access facets associated with the application and provides a response to planning policy. The document then concludes, under section 8 with

an appraisal of the development against the relevant policies, justifying why it should be granted permission.

1.6 The proposed development relates to a solar development and associated works on land at Pen-Y-Dre High Comprehensive School, Merthyr Tydfil.

Brief

1.7 The project brief involves the submission of a full planning application for the construction of a solar farm and associated works on land at Pen-Y-Dre High Comprehensive School, Merthyr Tydfil on behalf of Merthyr Tydfil County Borough Council. The proposed solar will directly connect to Pen Y Dre High School, the new Goetre Primary School, the Prince Charles Hospital and the Bishop Hedley Campus. In promoting this land for a Photovoltaic solar development, it allows the council to comply with national guidance and ensures that it complies with its own local policies which advocates the delivery of renewable energy projects and sustainable forms of development. As such, in order to demonstrate the site is acceptable, the brief comprises the commissioning of technical reports to ascertain whether this site can readily accommodate the proposed development.

Vision

1.8 The vision for this site is ultimately to promote a renewable form of development which will assist in the nearby schools and hospital becoming less dependent on non-renewable and unsustainable ways to generate its energy needs. The site has been identified as a suitable location with no legal constraints to be able to deliver this vision.



SITE IN LOCAL CONTEXT



SITE CONTEXT AND ANALYSIS

General location

2.1 The site relates to parcel of grassland situated at Pen-Y-Dre High School on the northern edges of Merthyr Tydfil. It is centred on the following grid coordinates: E: 305126 , N: 208314.

The site

2.2 The area which is to be occupied by the solar farm comprises a field which is ancillary to the school. It is noted that the land immediately to the south west benefits from Planning Permission for the new Goetre Primary School. The redline for the site extends beyond the main solar proposals grounds / site with cables connecting to the Prince Charles Hospital and the Bishop Hedley Campus. The area for the solar arrays is bound to the east by residential properties whilst all other boundaries are formed by the school grounds. The site itself is comprised of a range of mostly greenfield habitats with scattered trees. It is irregular in shape and measures approximately 2.5 hectares in extent.

2.3 Vehicular Access to the site is via Sixth Avenue, positioned along the eastern boundary. This connects to Galon Uchaf Road which then extends from the A465 trunk road approximately 300m north of the site. In respect of pedestrian access there are no public rights of way within or adjoining the site.

2.4 A review of Historic Environment Wales' records reveals that there are no Listed Buildings or Scheduled Ancient Monuments within the vicinity of the application site.

2.6 A review of Natural Resources Wales' (NRW) Development Advice Map (DAM) indicates that the site is located within flood zone A as such is considered to be at little or no risk of fluvial or coastal/tidal flooding. Whilst not yet adopted, NRW's Flood Map for Planning (TAN15) should also be used to guide development proposals. This confirms that site is within flood zone 1 for both river and sea flooding and flooding from surface water and small water courses. As such it not at risk of flooding.

2.7 The Coal Authority Interactive Mapping shows that the site is within a Coal Mining Reporting Area but is not within a

development high risk area. As such a CMRA is not likely to be required.

2.8 The Adopted Merthyr Tydfil Replacement Local Development Plan 2016 - 2031 provides the local planning policy framework for the area and was adopted by Council on 29th January 2020. It is the basis for land use planning decisions in the County Borough, excluding Brecon Beacons National Park. The RLDP proposals map shows that the site is white land located within the settlement boundary. An active travel route runs on the footpath within the site which travels east to west.

2.9 The site is grade 4 in terms of its Agricultural Land Classification as such is not best most versatile land.

2.10 In terms of topography, the site is on sloping ground, sloping from north to south.

2.11 In addition and as illustrated on the site location plan, the red line boundary for the development comprises the cable route which connects from the solar site to Pen Y Dre High School, the new Goetre Primary School, the Prince Charles Hospital and the Bishop Hedley Campus. The vast majority of the cable will require excavation.

Planning History

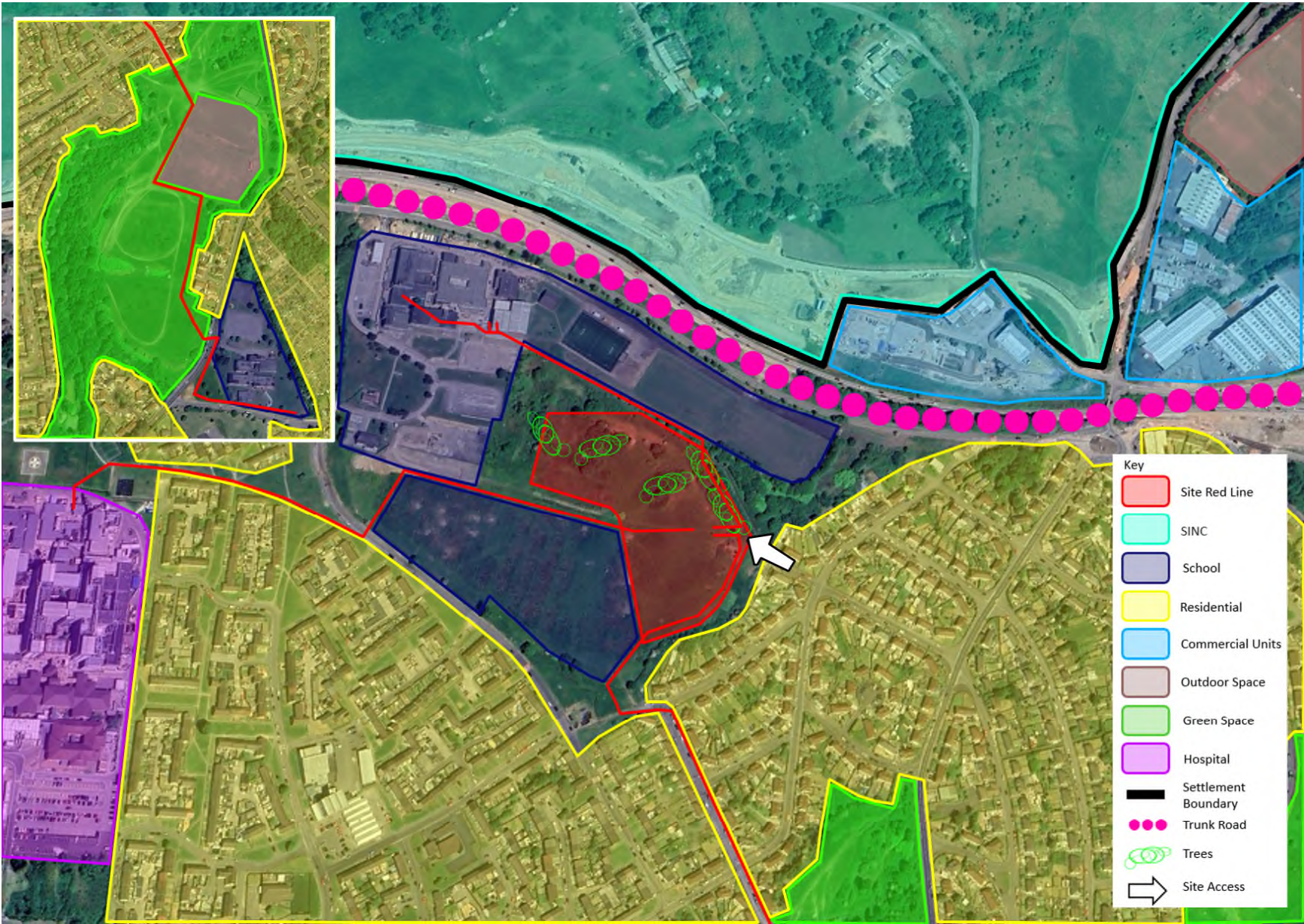
2.12 A review of Merthyr Tydfil CBC online planning register indicates that the site does not have any relevant planning history which is publicly available to view. Planning history of the adjacent land which is relevant to the site includes:

- Ref: P/24/0034 – Construction of a new Primary School including access, landscaping, play / sports pitches, parking, external works, swale, plant and associated works - Land To The North Of Goitre Lane Gurnos Merthyr Tydfil – approved.



Figure 1: Site Access

OPPORTUNITIES AND CONSTRAINTS PLAN



INTERPRETATION

Interpretation

3.1 The concept for the development of the site has derived from the following:

- A full site analysis including, a full desktop study of the site and its surroundings;
- A site visit and general visual assessment of the surrounding area including the built form and also how residents interact with the area; and
- Discussion with the client to gain a clear understanding of the brief and vision for the project

3.2 The above steps have presented key opportunities and constraints for the site which are outlined below;

Opportunities

Renewable Energy – The site presents an ideal opportunity for the School to produce renewable energy and the Council in meeting their carbon reduction targets.

Topography – The rolling topography of the site ensures that the solar arrays can be positioned in a discreet manner which screens the development from the surrounding landscape and residential properties.

Access – The site is conveniently located near Sixth Avenue, in close proximity to the A465 trunk road, facilitating easy transportation and access for the development of the site.

Settlement Boundary – The site is within settlement boundary and recognised as undesignated white land on the Merthyr Tydfil Replacement Local Development Plan 2016 - 2031.

Energy Bill - a significant need for the development is to reduce energy bills associated with the uses that will benefit from the energy generation.

Location - the site is in a good location for connections to be provided off site to Bishops Hedley and the Hospital.

Constraints

Residential Properties – The site is situated approximately 20m west of residential properties development at the north west Gurnos area. Notwithstanding, it is considered that topography and hedgerows will provide natural screening for the majority of the development. Furthermore the proposed

development is not significant in creating nuisances.

Trees - 3 Category B trees will have to be removed for the development. Notwithstanding, these will be replaced on a 3 to 1 basis.

Grassland - The panels will cover most grassland, limiting the sunlight it receives.

DESIGN EVOLUTION

Pre-Application Discussions

4.1 The proposed development was subject to Pre-Application Discussions with Merthyr Tydfil Council in September 2024 (Ref: PA/24/0026). The following comments are below;

Ecology

Grassland - Concern from the officer regarding how the anticipated PV units will change the composition of the site. This has been addressed with further detail in the green infrastructure statement submitted with the application.

Trees - Concern regarding the hedgerow loss on the site. This will be compensated with a 3:1 ratio as per Planning Policy Wales 12.

Logistics - Full details regarding the exact methodology needed to install the system must be provided. The contractor Morgan Sindall will provide this detail in the CEMP.

Cable Route - Ecology needs to be considered along these routes. Confirmation that surveys have been completed.

Highways

Comments relating to construction traffic which will be managed through the submission of a CEMP.

Right of Way

No concerns have been highlighted.

Environmental Health

No concerns have been highlighted.

Other

Submission of SAB application will be completed.

Pre Application Consultation Discussion

4.2 A pre application consultation was undertaken between the 29th of November to the 3rd of January.

4.3 We received one objection from local residents which has been addressed in the PAC report. There were no objections received from community consultees, and specialist consultees.



Pre-application Layout

PLANNING POLICY

5.1 The planning policy framework for the determination of this application is provided by the content and scope of National Planning Policy, which is contained within the twelfth edition of Planning Policy Wales (PPW) and its associated Technical Advice Notes (TANs), together with the Local Planning Policy and its supplementary planning guidance.

Planning Policy Wales

5.2 Future Wales – the National Plan 2040 is our national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

5.3 Paragraph 5.4.13 of PPW states that planning authorities should promote the re-use of previously developed, vacant, and underused land, while Paragraph 5.6.6 advises that new development sites should, wherever possible, be located within or adjacent to defined settlement boundaries, preferably where there is public transport provision.

Future Wales the National Plan: 2040

5.4 Future Wales – the National Plan 2040 is our national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining, and developing a vibrant economy, achieving decarbonisation and climate resilience, developing strong ecosystems and improving the health and well-being of our communities.

5.5 Policy 2 of the Plan relates to Shaping Urban Growth and Regeneration – Strategic Placemaking and in respect of a variety of housing advises the following:

“To ensure places are socially mixed and cater for varied lifestyles, they should have a mix of housing types and tenures and space that allows for home-working. Urban growth and regeneration should cater for families,

couples and single people of different ages Policy 2 provides the basis for local planning authorities to support intensification in and around town centres. This will support the future of our town centres and provide opportunities for small-scale development, including new housing and mixed-use development.”

Cardiff, Newport, and the Valleys are identified as one National Growth Area for strategic housing growth within Policy 33 of Future Wales. This states:

“Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the South East region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.

The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Cardiff, Newport and the Valleys’ strategic role and ensure key investment decisions support places in the National Growth Area and the wider region. The Welsh Government supports Cardiff’s status as an internationally competitive city and a core city on the UK stage. Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night time economy and finance. The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment. The Welsh Government will work with authorities within the region and in England to promote Newport’s strategic role and ensure key investment decisions in Wales and England support Newport. The Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities.

The Welsh Government will work with regional bodies, local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing

sector, and to ensure a regional approach is taken to addressing socio-economic issues in the Valleys. The Welsh Government supports development in the wider region which addresses the opportunities and challenges arising from the region’s geographic location and its functions as a Capital Region.”

Whilst Monmouthshire is not specifically referenced within this policy, its location and proximity with regard to nearby Newport and the rest of the National Growth Area should be taken into account for new development.

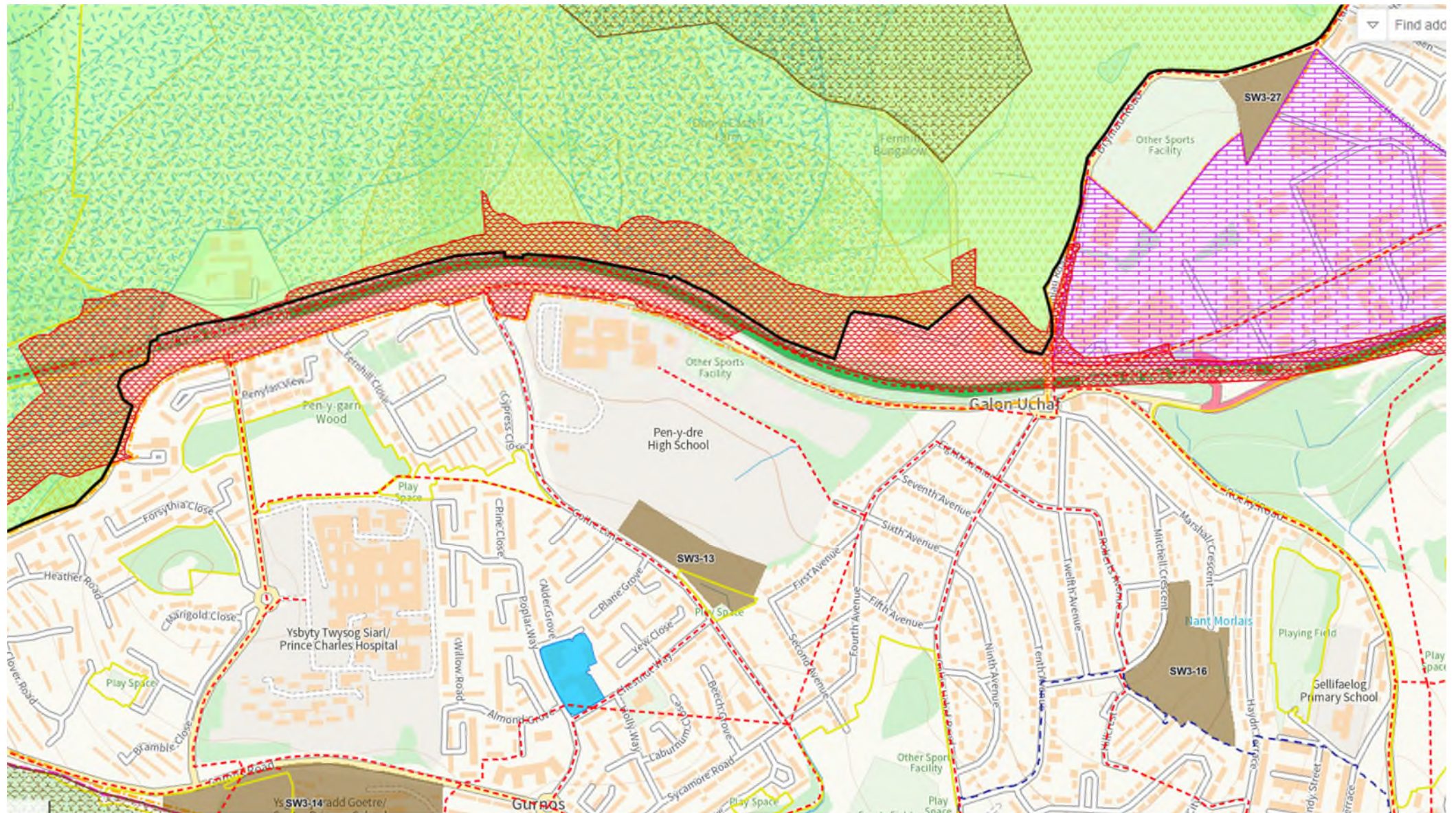
Well-being of Future Generations (Wales) Act 2015

5.6 The Well-being of Future Generations (Wales) Act came into force in 2015 and seeks to improve the social, economic, environmental and cultural well-being of Wales. The Act puts in place seven well-being goals in order to make sure that everyone works towards the same vision, which are:

- A prosperous Wales;
- A resilient Wales;
- A healthier Wales;
- A more equal Wales;
- A Wales of cohesive community;
- A Wales of vibrant culture and thriving Welsh Language;
- A globally responsible Wales.



MERTHYR TYDFIL REPLACEMENT LOCAL DEVELOPMENT PLAN 2016 - 2031 PROPOSAL MAP



PLANNING POLICY

Policy Reference	Relating to
SW4	Settlement Boundaries
SW11	Sustainable Design and Placemaking
CW1	Historic Environment
EnW1	Nature Conservation and Ecosystem Resilience
EnW3	Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species
EnW4	Environmental Protection
EnW5	Landscape Protection
EcW8	Renewable Energy

Design and Access Statements in Wales (April 2017)

5.7 Design and Access Statements (DAS) have been required in Wales for many planning applications since 2009. Since then much has been learned about their use and what constitutes a useful DAS. This guide builds on that understanding and responds to legislative requirements for DASs under the Planning (Wales) Act 2015.

Merthyr Tydfil Replacement Local Development Plan 2016 - 2031

5.8 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decision should be made in accordance with the authority's adopted development plan, unless material considerations indicate otherwise. In this instance, the statutory development plan for this application site is provided in Merthyr Tydfil Replacement Local Development Plan 2016 – 2031 which provides the local planning policy framework for the area and was adopted by Council on 29th January 2020.

5.9 The Merthyr Tydfil Replacement Local Development Plan (LDP) 2016 – 2031 proposals map shows the site is undesignated white land. The red dashed line is a proposed active travel route. The site is within settlement limits. The RLDP constraints map shows the site is again undesignated white land. The site is located within the Merthyr Tydfil Landscape of Outstanding Historic Interest.

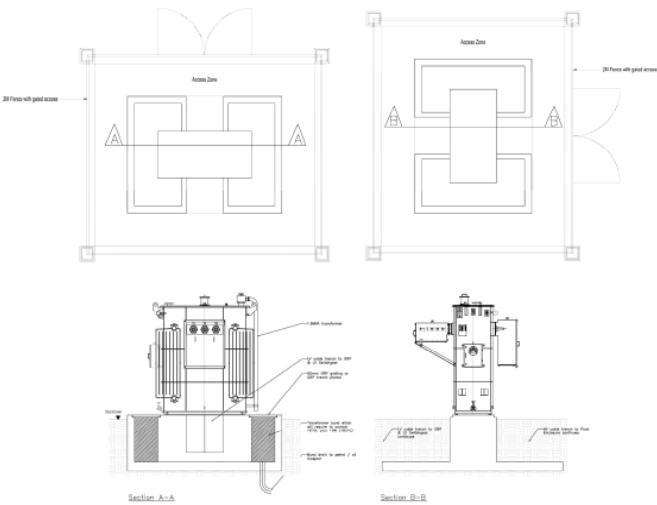
Supplementary Planning Guidance

5.10 The following Supplementary Planning Guidance (SPG) are of relevance to the proposed development:

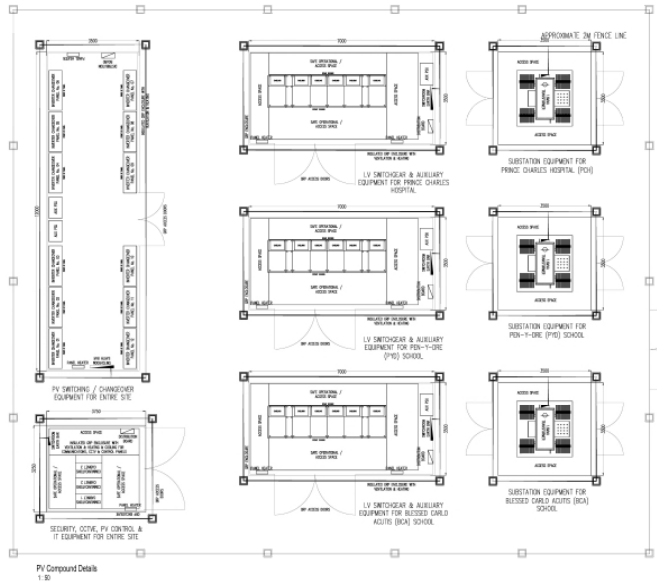
- Sustainable Design
- Nature and Development

The table of LDP policies on the left are considered to be of relevance to the proposal.

GENERAL ARRANGEMENT PLAN



Equipment Elevations



GRP Layout

THE PROPOSAL

Overview

6.1 The Five Objectives of Good Design are a set of principle considerations, as outlined in Technical Advice Note 12, to ensure developments effectively respond to local context so that they assimilate into the locality and are functional for their intended user. The Five Objectives of Good Design are Access, Movement, Character, Environmental Sustainability and Community Safety – each of which will be dealt with separately in turn below.

Access and Movement

6.2 Vehicular access is achieved via Sixth Avenue which connects to Galon Uchaf Road that extends further from the A465 Heads of the Valley trunk road, approximately 300m north of the site. Given the nature of the scheme, the main considerations over access will centre on the construction phase of the development. For example, movements to and from the site during construction will be of a quantity and frequency greater than movements post construction. This is because movements during the construction stage will involve deliveries for materials to build the solar arrays, whereas, movements post construction will be restricted to the maintenance of the solar arrays which will only require a small number of movements from the maintenance company when required.

6.3 Based on this review of the proposed access to the site, it is considered that construction vehicles can be accommodated without undue adverse impact on the public highway.

Character

Amount

6.4 The proposal will provide a 1.4MW solar farm. The energy produced will feed directly into Pen Y Dre High School, the new Goetre Primary School, the Prince Charles Hospital and the Bishop Hedley Campus.

Scale

6.5 As illustrated on the accompanying elevation plans, the solar arrays will be relatively low lying to the ground. In addition, the onsite buildings which is enclosed within the GRP compound will be built to one storey. The development will therefore not result in a dominating impact on the site and surrounding landscape.

Layout

6.6 The application is accompanied by a Proposed PV Site

Layout Plan (Ref: 26Z006-LAW-X-X-DR-A-069-1005_) which illustrates that the solar panels will all be facing in the same direction. This will ensure the most efficient use of solar exposure as the sun's position in relation to the site changes throughout the course of a day. The site will be enclosed by secure fencing with opportunities for enhanced planting.

6.7 The proposals also include the cable routes which will run to each of the aforementioned facilities. The redline plan demonstrates the location of the cables to be laid within the adopted highway.

Appearance

6.8 The appearance of the development will comprise typical solar PV arrays which are low lying. The site fall north to south which provides a good base for the arrays to sit on and receive maximum sunlight. The site also includes the infrastructure required to support the PV arrays. This is in the form of standard GRP units which do not significantly vary in their appearance and design. The units are manufactured for efficiency and purpose. The units will sit central to the site. Overall the scheme will appear as any typical solar development.

Community Safety

6.9 In terms of community safety, the solar arrays will be encapsulated by appropriate fencing which will satisfy both the insurers' requirements as well as the local planning authority's guidelines, in order to ensure the site remains secure from outside influences. Additionally, the site will be monitored by fixed CCTV mounted in protective enclosures which will be allocated around the site perimeter in order to keep track of onsite conditions. As such, the impact of development on safety is considered acceptable.

Environmental Sustainability

6.10 As identified within Technical Advice Note 12, the objectives that developers need to respond to in respect of Environmental Sustainability include that of achieving efficient use and protection of natural resources, enhancing biodiversity and designing for change.

6.11 In this respect, the solar farm will fundamentally underpin the three schools and hospital'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



Green Infrastructure Context Plan

Refer to Drawing - 26CB01-SBC-00-XX-DR-L-0400 - Goitre Primary School for details

MUGA

KEY

Proposed Fencing

Wire mesh fencing

Proposed Cable R

1m easement required

Proposed Drainage

Softworks

Retained Standalone

Retained Tree Groups

Root Protection Area

Retained Existing

Removed Neutral

Proposed Trees

Proposed Root Barrier

Proposed SuDS V

Proposed Wildflower

Proposed Species

MUGA

WILDFLOWER MEADOW MIX (W2)	
SEED MIX CODE	SEED MIX NAME
(M)	Crucigerate Seed L - Good General Purpose Mix

- Retained Standalone Tree
(see Tree Report: ArbTS_1751.2_GoetrePrimary for details)
- Retained Tree Group
(see Tree Report: ArbTS_1751.2_GoetrePrimary for details)
- Root Protection Area (RPA)
- Retained Existing Neutral Semi-Improved Grassland
The composition of existing habitats/grassland is predicted to change due to increased shading created by the PV units
- Removed Neutral Semi-Improved Grassland
Newly proposed hardstanding areas will result in the removal of existing grassland
- Proposed Trees [T1]
-14-16 Standard Trees
- Proposed Root Barrier
- Proposed SuDS Wildflower Mix [W1]
Emorsgate EM8 Meadow Mixture for Wetlands
- Proposed Wildflower Meadow Mix [W2]
Emorsgate EM1 Basic General Purpose Meadow Mixture
- Proposed Species Rich Native Hedgerow [H1]
'A' shaped, 2m width, 12x 1+1 transplants per linear m

THE PROPOSAL

contribute to Merthyr Tydfil's and Welsh Government of the public sector to be carbon neutral by 2030.

6.12 The application site is already visually contained by substantial natural buffers in the form of vegetation and hedgerows and these will be retained to achieve complete curtailment and comprehensive screening of the site from external viewpoints. Additionally, more hedgerow and trees will be implemented on the site. In addition to the benefits associated with curtailment and screening, the retention and implementation of the hedgerows and trees would also preserve and enhance the environmental sustainability of the site.

Landscape and Biodiversity

6.13 The application is accompanied by a Landscape and Visual Appraisal prepared by Soltys Brewster. The report concludes that there will be no significant changes likely to landscape or visual receptors. Locally, changes to views likely to be experienced by receptors overlooking the site have been recorded as likely to be of high magnitude. Cumulative impacts have also been identified locally for the Proposed Development in combination with the proposed development of the new Goetre Primary School, although these are considered to be of medium to low magnitude. Whilst these impacts would not be unusual for a development of this size and nature, some mitigation in the form of Green Infrastructure management and planting is recommended. This is demonstrated on the submitted landscape plans.

6.14 To mitigate this, the existing areas of scrub and scrub woodland will be retained and reinforced. Furthermore, native planting along the eastern edge of the site has been proposed, this is to increase the screening value. The scheme will therefore be sympathetically sited within the landscape.

6.15 Additionally, the proposal includes the establishment of a native mixed-species hedgerow along the perimeter of the site and surrounding the site compound. This will not only enhance the visual integration of the development but also provide natural screening from the footpath to the north and other areas, fostering a seamless blend with the surrounding landscape.

6.16 The proposed development is temporary in nature, reversible and free from permanent development. It will therefore not result in the introduction of a use which is

incompatible with its location as the site can be returned to its original state after decommissioning.

6.17 In respect of biodiversity, the application is accompanied by a Biodiversity Strategy prepared by Ecological Services. The survey identified that Habitats within the site boundary include worn footpaths, neutral semi improved grassland, scattered trees, stand of Japanese Knotweed and marshy grassland. Further, no reptiles were found to be present within the site during the two survey undertaken in 2022 and 2023.

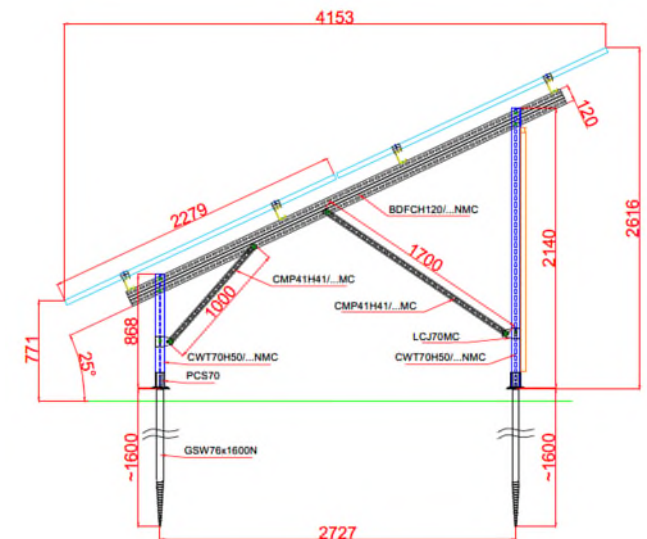
6.18 The amount of permanent habitat loss within the solar farm site will be limited to the building compound footprint, access track and parking area around the building compound. Each PV unit will be mounted on a frame and fixed to the ground using ground screws. The amount of direct habitat loss attributed to the PV units is considered to be minimal.

6.19 The PV array will require maximum sun exposure therefore tree planting within the site boundary is not considered viable. Instead a native species hedgerow will be planted and managed at a maximum height of 2m. The aim will be to create a dense 'A' shaped hedgerow approximately 2m wide at the base with sufficient space to allow management access for cutting.

6.20 The proposed development therefore incorporates the potential to enhance on site biodiversity in accordance with the Environment (Wales) Act 2016 and will not result in an adverse impact on protected species.



CCTV Layout



PV Array Elevation

PLANNING APPRAISAL

Overview

7.1 This section aims to identify the main issues relevant to the determination of the application and assess the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- The **Principle of Development;**
- **Transport and Parking**
- **Biodiversity**
- **Heritage**
- **Drainage**

The Principle of Development

7.2 The site is located within the settlement boundary where there is encouragement for development as defined by policy SW4 which states “to encourage development within urban areas, support the re-use of previously developed land, and to protect and support the functioning of our rural economy and the countryside, settlement boundaries will be defined”.

7.3 Policy EcW8 relates to renewable energy and states:

We will support the use of renewable energy as a tangible means of reducing our local carbon footprint, where appropriate to do so. Development proposals for renewable energy will be permitted where:

- *They do not have an unacceptable landscape and visual impact, including on the setting of the Brecon Beacons National Park.*
- *There would be no unacceptable cumulative impacts in combination with existing or consented development.*
- *Satisfactory mitigation can be put in place to minimise the impacts of the renewable energy proposal and its associated infrastructure.*
- *Proposals make provision for the appropriate restoration and after-care of the land for its beneficial future re-use.*

Within the Local Search Areas (LSA), proposals for solar energy generation will be permitted subject to the above criteria.

Proposals for other development within these areas will only be permitted where they can demonstrate that they would not unacceptably prejudice the renewable energy generation potential of the LSA.

7.4 Each of the criteria identified in policy EcW8 will be discussed below.

They do not have an unacceptable landscape and visual impact, including on the setting of the Brecon Beacons National Park.

7.5 Soltys Brewster have prepared a Landscape and Visual Appraisal for the site and development of solar arrays. A study area extending to 3km from the centre of the site was adopted. This is considered to be appropriate to the scale of the proposed development and the nature of the receiving landscape. The site has a strong southerly aspect, sloping from a high point of around 305m AOD to a low point of around 290m AOD. Open, lower-lying areas below the site boundary to the south form the construction site for Goetre Primary School with some initial construction work evident, including temporary fencing and earthworks.

7.6 There are no landscape-related designations extending into the Proposed Development site. The Bannau Brycheiniog National Park, a Statutory Designation, extends across parts of the study area to the north and to the west and is around 1.5 km from the site at its closest point. The LVA concludes there will be no significant changes likely to landscape or visual receptors. Locally, changes to views likely to be experienced by receptors overlooking the site have been recorded as likely to be of high magnitude. Whilst this would not be unusual for a development of this size and nature, some mitigation in the form of Green Infrastructure management and planting would be recommended. This is demonstrated within the landscape plans.

There would be no unacceptable cumulative impacts in combination with existing or consented development.

7.7 The site is located within the school grounds for Pen Y Dre High School. The site sits immediately adjacent to the

boundary the new Goetre primary school which is recently approved. It is not considered that the development in combination with the existing and proposed school grounds would be out of character for the area or result in unacceptable impacts. There are significant road works taking place north of the site with the heads of the Valleys Road and the area is already significantly influence by the built character of Merthyr Tydfil.

Satisfactory mitigation can be put in place to minimise the impacts of the renewable energy proposal and its associated infrastructure.

7.8 The LVA makes recommendations for Green Infrastructure to be installed as part of the development. A Green Infrastructure Statement has been provided alongside a set of landscape plans and details. The plans demonstrate there is significant opportunity to develop planting surrounding the solar arrays. This helps to achieve a positive biodiversity impact.

Proposals make provision for the appropriate restoration and after-care of the land for its beneficial future re-use.

7.9 A scheme can be developed for the appropriate restoration of the site. It is suggested a suitably worded planning condition can secure this requirement.

7.10 Overall the proposals are heavily supported and by policy EcW8 relating to renewable energy and will significantly contribute to local renewable energy creation providing direct support to key public buildings including Pen Y Dre High School, the new Goetre Primary School, the Prince Charles Hospital and the Bishop Hedley Campus.

Transport and Parking

7.11 It is acknowledged that in order to facilitate the construction of the development, there will be an increase in vehicular movements to the site for a short period of time which is managed through procedures adopted in Construction Management. However, once established, the solar farm will require minimal personnel on site, as such, will result in a negligible impact on the surrounding highway

PLANNING APPRAISAL

network. Discussions have taken place with the local highway authority which have confirmed that a construction phase plan will be required to confirm there will be no negative impacts to the surrounding highway network during construction. Overall the proposals development will not result in a prolonged negative impact to the surrounding highway network.

Biodiversity

7.12 The proposals are supported by a Tree Survey and Arb Impact Assessment. The survey has identified that two individual trees will be lost one category B and the other category C. The proposals will result in the loss of one tree ground category C quality. These trees should not present a constraint on developing the site. The moderate quality tree – T6 removal can be readily mitigated by suitable compensatory tree planting. Tree planting of 9 no. trees is proposed and demonstrated on the landscape plan.

7.13 An Updated Preliminary Ecological Assessment (PEA) of all land within the development boundary was completed by Ecological Services Ltd in December 2023. The PEA report highlighted a number of ecological considerations that would be required should development plans for the site progress. One consideration was the use of the site by bat species therefore bat surveys of any trees have been proposed prior to any removal or pruning.

7.14 Ecological Services were instructed to undertake bat and tree surveys within the proposed development site to inform the proposals at site. Advice on surveying trees for bat use can be found in the BCT Survey Guidelines 2023 (4th Edition). Trees within this site were found to have **no** bat roost suitability. All can be removed with no further consideration to bat roosting use.

7.15 Ecological Services have prepared a Biodiversity Strategy which outlines the principles that the site will follow to achieve Net Biodiversity Benefit as required by Planning Policy Wales 12 and specifically Chapter 6. The amount of permanent habitat loss within the PV array site will be limited to the building compound footprint, access track and parking area

around the building compound. Each PV unit 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 considered to be minimal.

7.16 Soltys Brewster have prepared a landscape plan and have started to assess the site in the context of its Green Infrastructure. The strategic landscape plan demonstrates opportunity for additional tree and hedgerow planting. The Proposed Development aims to strengthen, reinforce and reinstate GI connectivity to this network through the creation of multifunctional GI corridors, including a native hedgerow to the perimeter of the site that will connect the Proposed Development site to the wider GI context.

7.17 The Proposed Development includes a SuDS drainage scheme comprising an attenuation basin which will retain a degree of water run-off and encourage natural drainage in-situ on-site, as well as increasing evaporation and micro-climate benefits. Extensive wildflower meadow seeding (tolerant of occasional flooding) within the basin will provide valuable habitat and ecological resources for the local ecosystem.

7.18 The Green Infrastructure Statement demonstrates the stepwise approach has been followed. Whilst it has not been possible to demonstrate a net gain in replacement planting to mitigate for the loss of scrub habitat, GI provision provides some beneficial multi-functional GI outcomes. These 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. Furthermore, site development provides the opportunity to secure beneficial long-term management, contributing more extensively to community and environmental (multifunctional GI habitat and sustainable drainage) needs.

7.19 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.

Heritage

7.20 An Archaeological and Heritage DBA has been prepared by EDP. The Site does not contain any 'designated historic assets' (i.e. World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Historic Parks and Gardens). As such, no designated historic assets would be physically affected by the Proposed Development within the Site. No impacts have been identified to the significance of designated historic assets nor to that of non-designated Locally Listed Buildings within the Study Area from change within their settings by the Proposed Development.

7.21 The Site is located within the Merthyr Tydfil Landscape of Outstanding Historic Interest (LOHI). The assessment concludes that the proposals would diverge from the character of the LOHI in the local Historic Landscape Character Area, but such change would be at a small-scale and not detract from or destroy the LOHI's characteristic industrial heritage, nor amount to a large-scale change to the existing urban residential character of the Gurnos and Galon Uchaf estates that would result in an adverse effect to the significance of LOHI as a whole. As such the Proposed Development would have a neutral effect on the LOHI.

Drainage

7.22 The proposed surface water drainage scheme will comply by adhering to the six standard principles whilst discharging to an agreed run-off rate. The scheme shall look to meet the interception criteria for the first 5mm of rainfall by ensuring that all hardpaved surfaces are captured by a roadside swale / pond. Attenuation will be provided above ground in a shallow swale/pond and sized for the 1 in 100yr+40% event. Treatment of run-off shall be achieved by a filter strip and swale/pond.

CONCLUSION

Conclusion

8.1 This Design and Access Statement (DAS) has been prepared on behalf of Merthyr Tydfil County Borough Council to accompany the full planning application for the construction of a solar farm, cabling and associated works on land at Pen-Y-Dre High Comprehensive School, Merthyr Tydfil, CF47 9BY.

8.2 The principle of development of the proposal is firmly established by complying with policy ECW8 within the Merthyr Tydfil Replacement Local Development Plan 2016 - 2031. Each of the criteria associated with Policy ECW8 have been discussed within section 7.

8.3 The scheme is proposed to provide direct renewable energy Pen Y Dre High School, the new Goetre Primary School, the Prince Charles Hospital and the Bishop Hedley Campus.

8.4 A robust landscape scheme is proposed which will assist in providing compensation and enhancements to the site with any potential impacts to existing habitats. The application is supported by a suite of ecology reports which demonstrate the existing site conditions.

8.5 Transport impacts will be largely limited to the construction phase when deliveries and construction vehicles are travelling to the site. Post construction there will be limited vehicular movements only for maintenance.

8.6 The landscape visual appraisal demonstrates that there will be no significant detrimental impacts to the landscape and within the wider area.

8.7 Consequently, it is considered that this Planning Design and Access Statement clearly demonstrates that the scheme, as presented, complies with the relevant national and local planning policies including supplementary planning guidance's. As such it is respectfully requested that Merthyr Tydfil CBC grant full planning consent for the proposed solar farm at land at Pen Y Dre High.