

The Planning Inspectorate
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Sent by email to: dns.wales@pins.gsi.gov.uk

22nd March 2021

Dear Sir/Madam,

REF. DNS/3227364

Proposed installation of a ground mounted Photo Voltaic (PV) solar farm development Land to the east of the A48 (Coordinates E257386, N 209389) and Land to the south west of Tycroes (coordinates E259219, N209551; & E259904, N209590)

We are responding to the letter sent to us on 15th January 2021 to reply with further information as requested by the Inspector. Within the letter there were two matters raised by the Inspector as requiring further information:

- 1. Further information in response to matters raised in Natural Resources Wales (NRW) consultation response dated 6 January 2021**
- 2. Further Information in Response to Matters Raised in National Grid Consultation response**

Each matter is addressed in turn below:

- 1. Further information in response to matters raised in Natural Resources Wales (NRW) consultation response dated 6 January 2021**

Within the consultation response submitted by Natural Resources Wales it states:

"We cannot conclude no impact from the cable route on marshy grassland habitat in area F8. We have concerns regarding the open cut method proposed in this area as there is potential for both the food plant Devil's-bit Scabious and Marsh fritillary butterflies to be present."

While the communication received from PINS on 15th January 2021 requested further information about the presence of species to help inform the potential impact on the marshy grassland

habitat in F8 we have also considered what options exist to minimise and potentially avoid any impact on this habitat.

As we have specified for the installation of other areas of the cable route within this proposal, we consider that a change to installation methodology - from an open cut trench to Horizontal Directional Drill (HDD) - will avoid impacts on this habitat in F8 and therefore a Likely Significant Effect can be screened out.

We've engaged informally with NRW to propose this change to methodology and revised the proposal documents (the Cable Route Preliminary Ecology Assessment, the Landscape and Ecological Management Plan and the Habitats Regulations Assessment). NRW has responded with recommendations and we have adapted the documents accordingly. NRW has also communicated (email dated 05.02.2021) that the change in methodology to using HDD is "definitely a preferred option."

On this basis, we are submitting the revised documents with a changed methodology which uses HDD to install the cable beneath F8. Our reasons for doing this are as follows:

- We consider the change to installing the cable using the HDD methodology is the most effective means to minimise or avoid harm to the habitat;
- We are confident that the changed methodology can ensure no Likely Significant Effect on the conservation objective of the SAC;
- It negates the requirement for further wildlife assessment. Subject to the Inspector's agreement on no longer requiring further wildlife assessment, we hope the application's period of suspension can be reduced and the application process continued. Having been subject to delays caused by the Coronavirus pandemic, this would be greatly appreciated by the Applicant.

2. Further Information in Response to Matters Raised in National Grid Consultation response

In response to the objection letter issued by National Grid dated 29th December 2020 we have engaged with Nation Grid's Gas Transmission, Engineering & Asset Management Team to discuss the matters raised in the letter and provide them with further information related to their concerns. Following this communication National Grid has agreed to withdraw their objection and has proposed conditions for us to meet before any construction of the proposed solar farm can

commence. Nation Grid has confirmed this in a letter dated 15th March 2021 which has been submitted to PINS and is attached with this response.

To communicate how we have addressed each point raised in the communication received from PINS on 15th January 2021, we have included a table below listing each requirement and response information:

<p>1. Further information in response to matters raised in Natural Resources Wales (NRW) consultation response dated 6 January 2021:</p> <p>i. NRW state that "<i>We are not in agreement with the conclusion that a Likely Significant Effect, alone or in-combination, on Caeau Mynydd Mawr SAC can be screened out.</i>" Consequently, in order for the Inspector to undertake a Habitats Regulation Assessment (HRA) further information is required:</p>	
Item	Applicant Response
Clarification on the footprint of the cable route and construction area	A revised plan showing the revised methodology (HDD) for installing the cable in F8 has been submitted.
Detailed habitat information of the area affected, particularly is the Devil's-Bit Scabious present, its population and location;	Due to the revised methodology of the cable installation in F8 we request this requirement is considered out of scope.
An assessment of the potential size of the meta-population of Marsh Fritillary Butterfly affected in a worst case scenario	Due to the revised methodology of the cable installation in F8 we request this requirement is considered out of scope.
A revised shadow HRA assessment containing mitigation measures and their effectiveness to ensure no Likely Significant Effect on the conservation objective of the SAC	A revised HRA which assesses the impacts of the revised methodology of the cable installation in F8 and finds that no Likely Significant Effect on the conservation objective of the SAC has been submitted. To assist the reader, updates to the HRA and other ecology documents are marked in blue text .
Statement of Common Ground between Spring Dev 02 and NRW focusing on the revised shadow HRA assessment and the	The email communications between the Applicant and NRW which confirms the revised methodology of the cable installation

effectiveness of the mitigation measures proposed	in F8 is preferable. The NRW letter dated 17.03.2021 providing recommendations for inclusion in the revised ecology documents. The Applicant has incorporated these recommendations within the resubmitted ecology documents.
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<p>2. Further Information in Response to Matters Raised in National Grid Consultation response:</p> <p>i. National Grid in their representation dated 29 December 2020 state that "<i>We are issuing an Objection to this project due to the potential of interference between the pipeline and the solar</i>". Consequently, in order for the Inspector to ascertain the impact of the proposal on the High Pressure Gas Pipeline (HPGP) further information is required:</p>
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Item	Applicant Response
Clarification on the footprint of the cable route and construction areas where they are located on or close to the HPGP; and	A revised plan showing the location of the cable and the location of the High Pressure Gas Pipeline has been submitted.
A Statement of Common Ground between Spring Dev 02 and National Grid.	A letter from National Grid dated 15.03.2021 which states the removal of their objection and states the conditions for the Applicant to meet before any construction of the proposed solar farm can commence.

<p>3. Revised CEMP and LEMP: Revised/updated Construction and Environmental Management Plan (CEMP) Landscape and Ecology Management Plan (LEMP) documents reflecting the additional assessments and information arising from items 1-2 above.</p>

Item	Applicant Response
	The Construction and Environmental Management Plan (CEMP) Landscape and

	Ecology Management Plan (LEMP) have been revised and have been submitted, incorporating the requirements detailed in points 1&2. Updates to the CEMP can be found at section 2.2.
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Please do not hesitate to contact me should you have any questions in respect of the above.

Yours sincerely



Ben Lewis MRTPI
Director

