

# Parc Dyffryn Planning Response Briefing

BRE Planning guidance for the development of large scale ground mounted solar PV systems Commercial scale ground mounted solar PV Ground Mounted Solar PV projects, over 50kWp, should ideally utilise previously developed land, brownfield land, contaminated land, industrial land or agricultural land preferably of classification 3b, 4, and 5 (avoiding the use of 'Best and Most Versatile' cropland where possible). Land selected should aim to avoid affecting the visual aspect of landscapes, maintain the natural beauty and should be predominantly flat, well screened by hedges, tree lines, etc and not cause undue impact to nearby domestic properties or roads

## Issues to consider related to Parc Dyffryn

### Loss of Agricultural Land

#### Planning Policy Wales 11

##### Placemaking in Rural Areas

3.38 The countryside is a dynamic and multi-purpose resource. In line with sustainable development and the national planning principles and in contributing towards placemaking outcomes, it **must** be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its landscape and natural resources.

##### The Best and Most Versatile Agricultural Land

3.58 Agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification system (ALC)<sup>16</sup> is the best and most versatile, and should be conserved as a finite resource for the future.

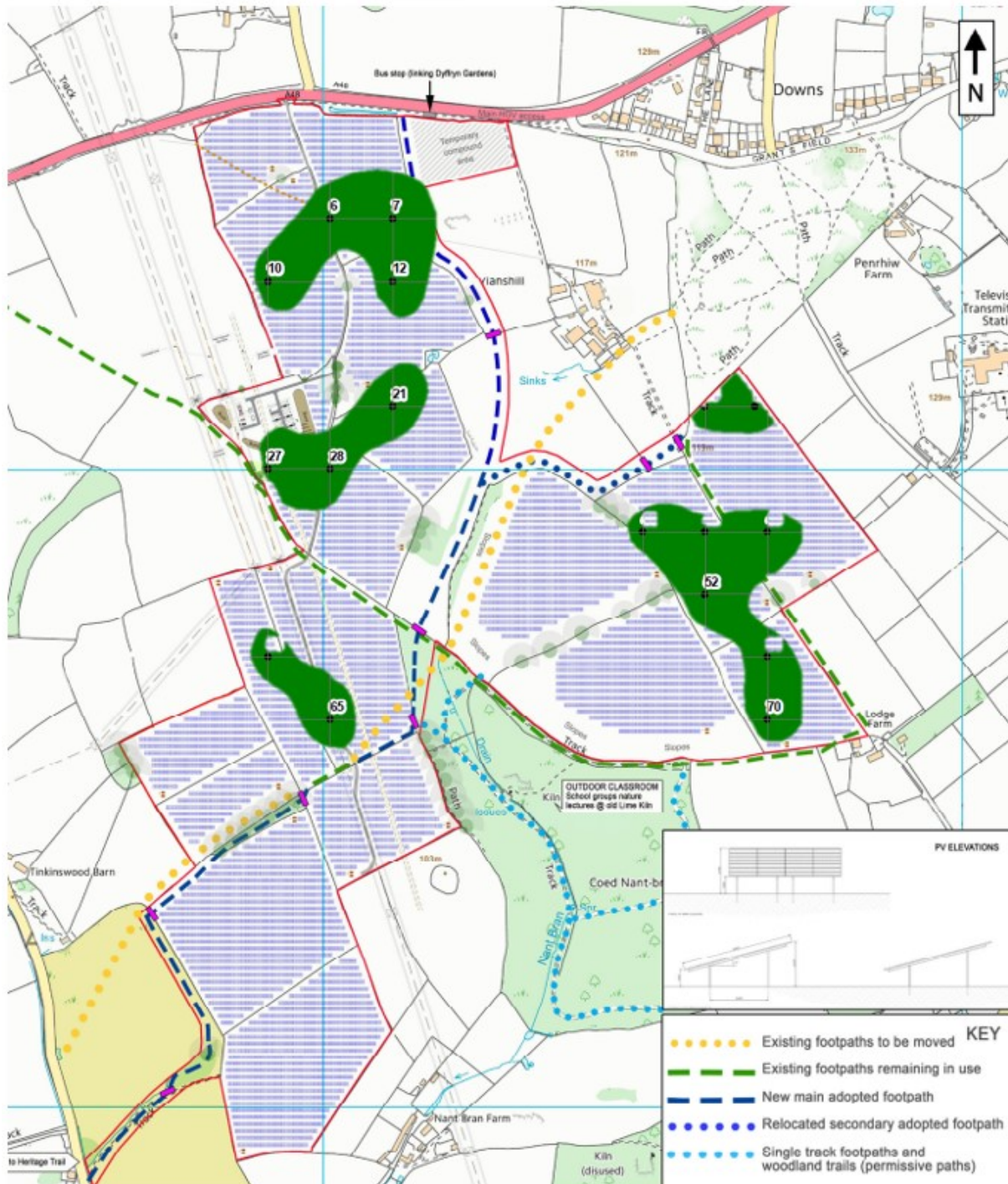
3.59 When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.

## Land classification

Significant areas of the land that would be covered with solar panels is 3a – the best and most versatile. The rest is 3b.

The areas that are 3a are marked in dark green on the plan below.

v



## Land contamination and degradation

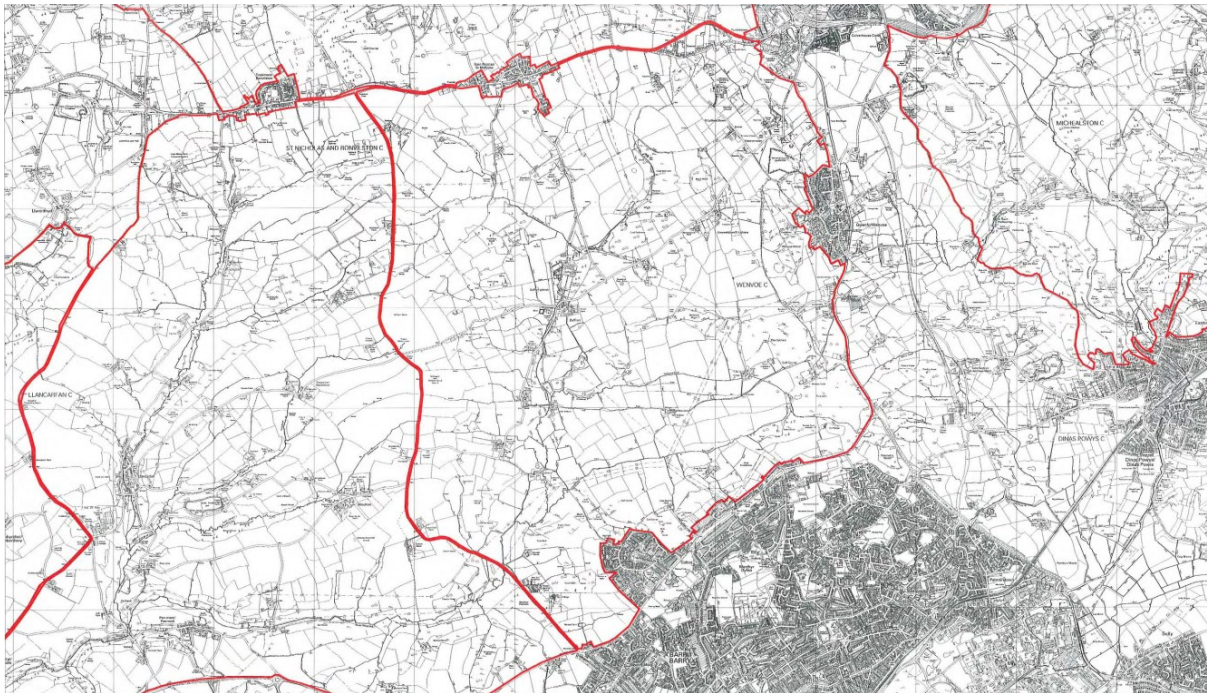
- What cleaning agents will be used to maintain panels – toxic?
- Is topsoil removed or disturbed? Are cables buried in the ground?
- Is there the possibility of toxic chemicals leaching out from the panels into the soil?

## Special Landscape Area

The proposed development site is entirely within the Dyffryn Basin and Ridge Slopes Special Landscape Area.

### Primary Landscape Qualities and Features

The majority of the area is an attractive, gentle valley of the Nant Bran and River Waycock. There are broad, pleasing views to well-managed countryside which retains a coherent large field pattern and woodlands. It is a relatively unspoiled historic rural landscape and the area includes several BAPs. Settlements are well integrated with the landscape and surrounding vegetation. The combination of road, stream/drainage ditch, stone wall/garden or dwelling is typical and representative of the Vale in this area. This combination has kept a high integrity and is well managed, hence rare.





## Evaluation Matrix SLA 5

Aspect	Aspect Area	Evaluation	Criteria								
			1	2	3	4	5	6	7	8	9
Geological	GL 108	Low	L	L	L	L					
	GL 238	Moderate	L	L	M	L					
	GL 523	Low	L	L	L	L					
	GL 749	High	H	M	M	L					
Landscape Habitats	LH 814	Low	L	U	U	U	U	U	L	U	
	LH 958	Moderate	H	O	M	U	U	M	M	M	
	LH 988	High	H	H	U	U	U	H	H	H	
Visual and Sensory	VS 152	Moderate	M	M	H	M					
	VS 213	High	H	H	H	H					
	VS 473	Moderate	M	M	M	L					
	VS 596	High	H	H	H	H					
	VS 620	Moderate	M	M	M	M					
Historical Landscapes	HL 022	Outstanding	O	O	H	H	H				
	HL 023	Moderate	M	M	M	L	M				
	HL 026	Moderate	H	M	M	M	H				
	HL 027	Outstanding	O	O	O	O	H				
	HL 050	Outstanding	O	O	H	H	H				
Cultural	CL 016	Moderate	M	M	M	U	M	H	L	M	U
	CL 017	High	H	H	L	U	U	U	U	U	U
	CL 028	Outstanding	M	H	L	M	O	H	L	L	U
	CL 039	High	H	O	L	U	O	H	L	H	L

### Characteristics of Local Landscapes

6.3.12 Planning authorities should provide for the conservation and, where appropriate, enhancement of local landscapes. This may include policies for landscape features, characteristics and qualities of local significance, and the designation of Special Landscape Areas (SLAs). Planning authorities should state which features, characteristics or qualities require extra protection, and explain how the policy or designation will achieve this protection. LANDMAP and any associated landscape character assessments (including the register of historic landscapes in Wales) should be used to inform local landscape policies and SPG, and to help identify or revise SLAs.

- Continuous rows of glass panels alter landscape aesthetic and character.
- Security fencing is out of character with the rural environment
- Great weight should be given to the findings and recommendations of an independent Landscape Quality Assessment.

## Public Rights of Way

Public rights of way (footpaths and bridleways) are important cultural artefacts, and amenities. Their routes should only be altered if there is no alternative.

Issues:

- Intrusive CCTV from solar development security
- Lost views from footpaths
- Noise from DC-AC inverter
- Proposal to divert footpath through old, waterlogged quarry
- What is the benefit of the proposed north-south footpath?
- The suggested paved footpath would be out of character with the area.
- Change in character of the area from rural to energy industrial
- No east-west link away from the A48
- No upgrading of footpaths to provide bridleway
- The footpaths should predominantly give access to the countryside and nature to maximise wellbeing, and not be confined to gaps between solar panels

## Access to the site, batteries and inverter

It appears that there will be two road accesses to the site. One, at Vians Hill Farm, should be sufficient.

Lithium-ion battery storage presents a **fire risk**. In case of fire at the battery and inverter unit, how would the Fire Service gain access? The preferred route would be the entrance of Vians Hill Farm, along the northern boundary, then south along the hedgerow.

Could an access road along the northern boundary enable Active Travel away from the A48 for the public?



## Biodiversity

6.4.3 The planning system has a key role to play in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement. Addressing the consequences of climate change should be a central part of any measures to conserve biodiversity and the resilience of ecosystems. Information contained in SoNaRR, Area Statements and species records from Local Environmental Record Centres should be taken into account.

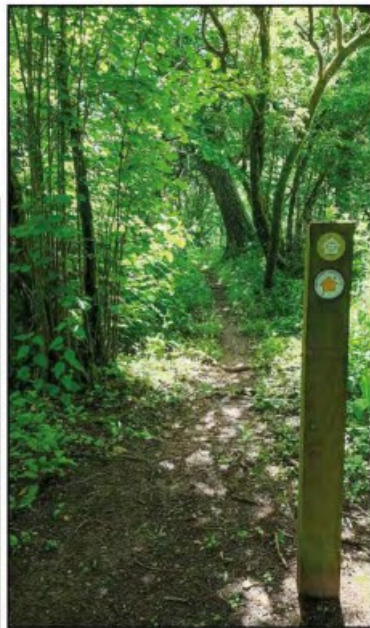
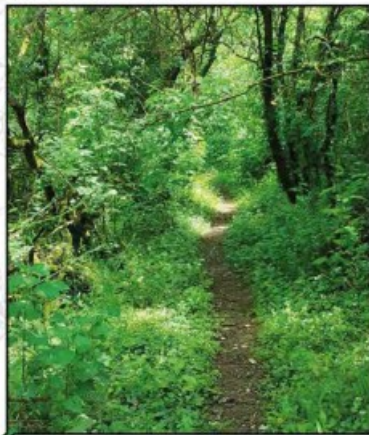
- support the conservation of biodiversity, in particular the conservation of wildlife and habitats;
- ensure action in Wales contributes to meeting international responsibilities and obligations for biodiversity and habitats;
- ensure statutorily and non-statutorily designated sites are properly protected and managed;
- safeguard protected and priority species and existing biodiversity assets from impacts which directly affect their nature conservation interests and compromise the resilience of ecological networks and the components which underpin them, such as water and soil, including peat; and
- secure enhancement of and improvements to ecosystem resilience by improving diversity, condition, extent and connectivity of ecological networks.

Creating new paths an increasing human activity within woodland, as proposed, may be detrimental to wildlife.

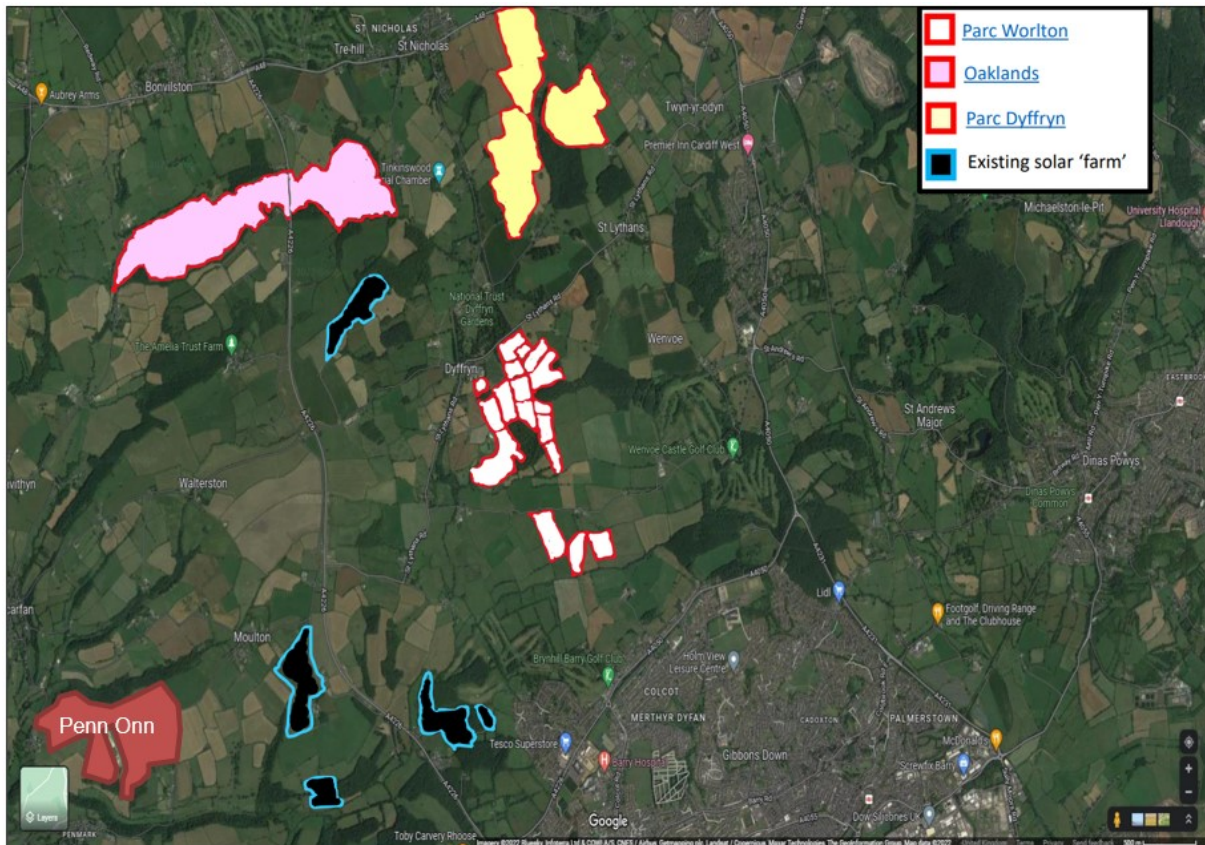
From the Cenin brochure:

### Woodland Paths

A significant amount of new paths will be created in the woodland. Existing paths will be extended.



## Cumulative Impacts

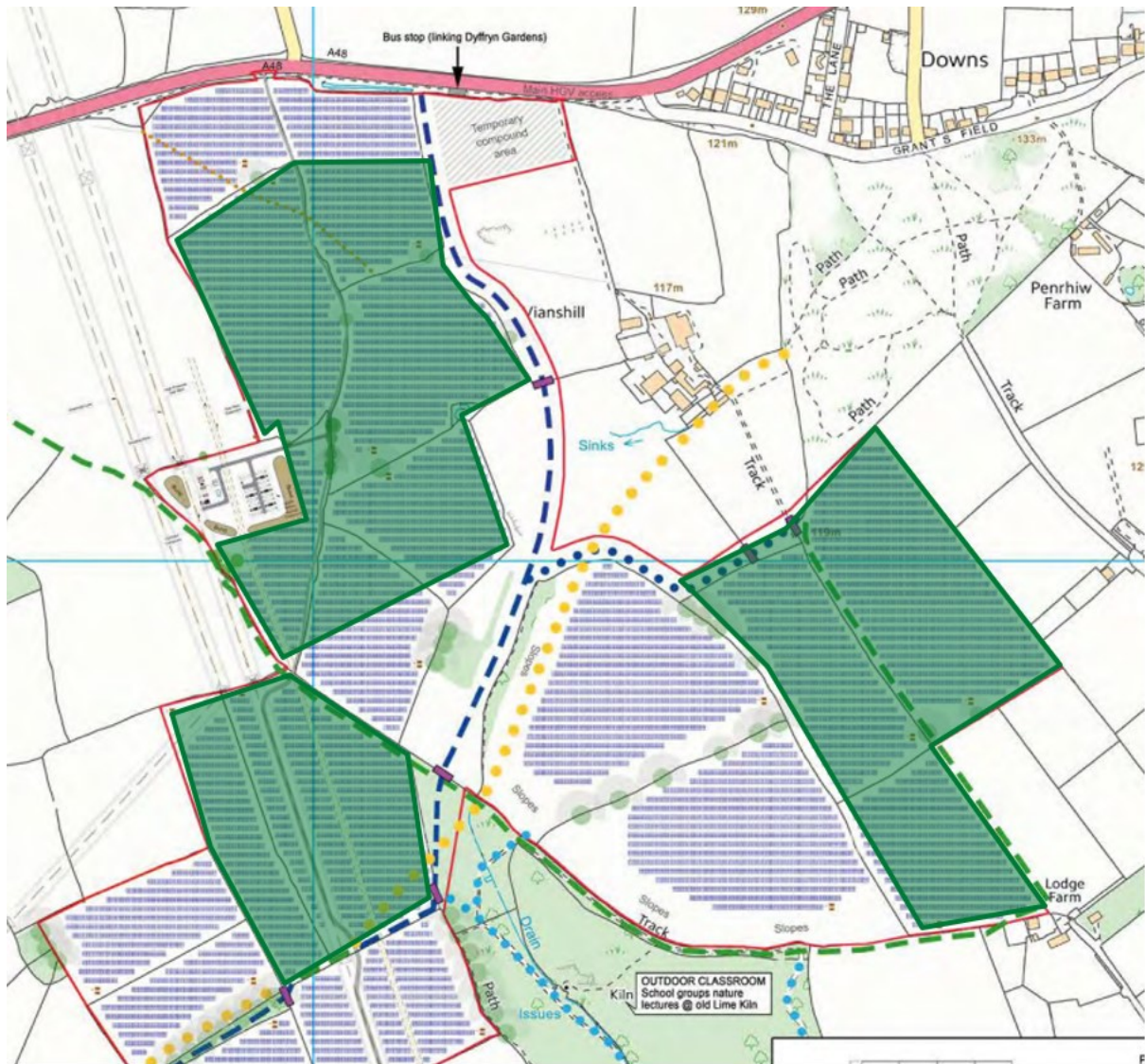


Cumulative Impacts include:

- Landscape and visual impacts
- Natural environment
- Loss of productive agricultural land
- Food security and prices

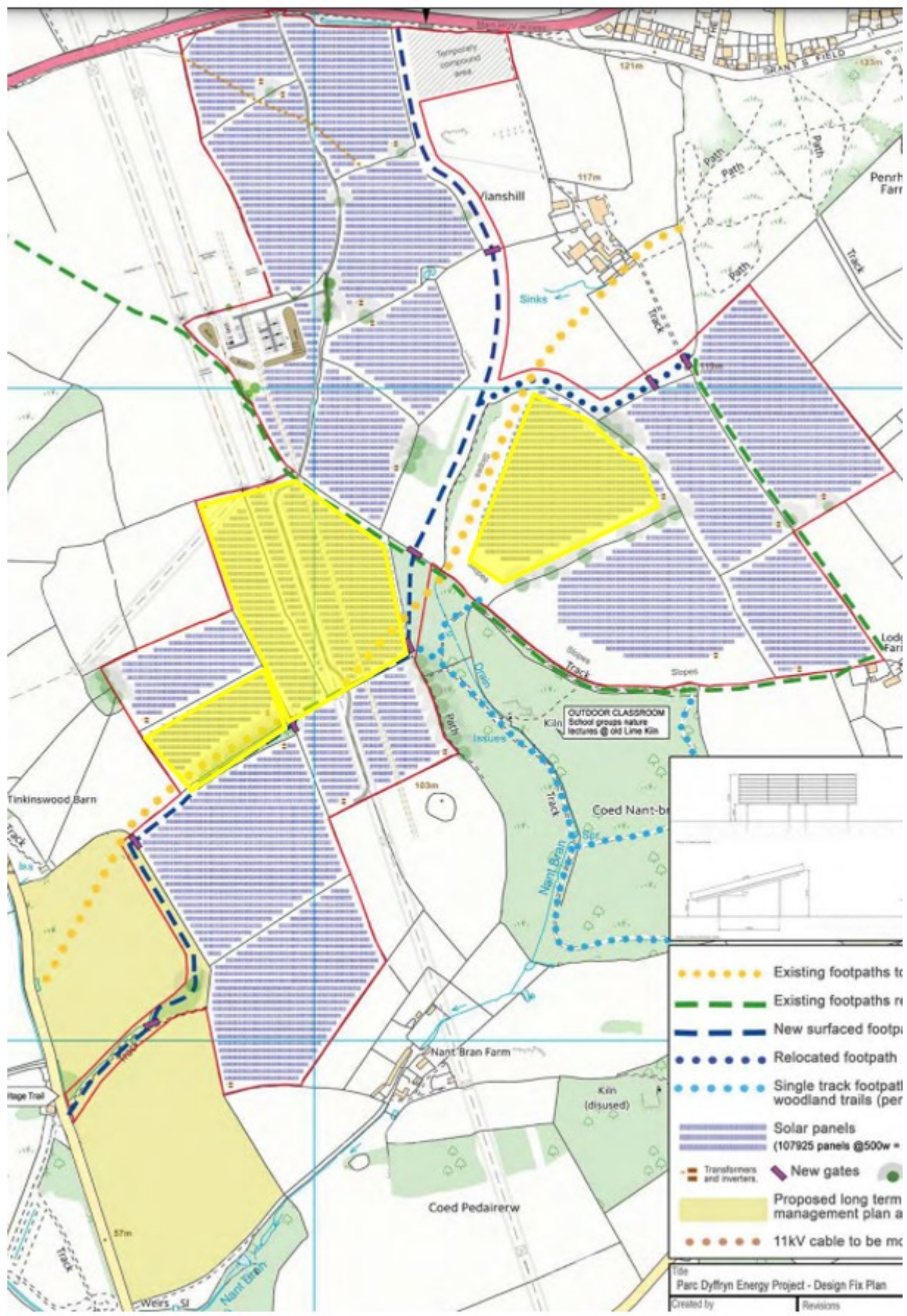


**Areas of most concern – loss of grade 3a farmland mixed with high visibility**

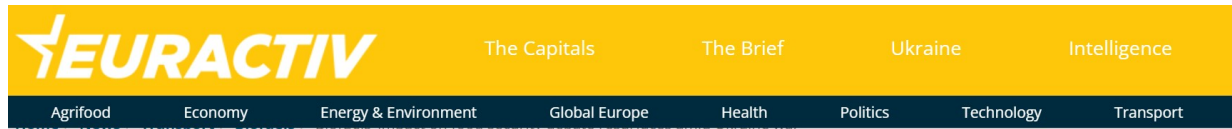




# Most visible areas – from public rights of way



## Food vs Energy



# Biofuels' impact on food security debate resurfaces amid Ukraine war

By Sean Goulding Carroll | EURACTIV | Apr 8, 2022



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ENVIRONMENT 14 March 2022

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OCTOBER 3, 2017|

# Biofuels policies drive up food prices, say over 100 studies

Europe's biofuels policies do increase global food prices. That's the wide scientific consensus, according to a review of more than 100 economic modelling studies of the impact on food prices from increased demand for biofuels made from food crops. Increased demand for biodiesel has driven the price of vegetable oils in the EU, such as rapeseed, palm oil, soy and sunflower, up 171% per exajoule (EJ) of biodiesel produced, according to the analysis by consultancy Ceruly for BirdLife Europe and T&E.

## Considerations include:

For or against the proposed new public right of way?

For or against the proposed diversion of existing public right of way?

For or against proposed accesses?

Impact on biodiversity.

Impact on well-being.

How can the proposal be improved for people and planet?

For or against the solar proposal?