

# PLANNING, DESIGN & ACCESS STATEMENT

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## Solar PV Project, Land at Nantycaws Waste Management Facility

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July, 2024



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**Description of development:**

Proposed Solar Farm and Associated Works

**Location:**

Land at Nantycaws Waste Management Facility, Llanddarog Road, Nantycaws, Carmarthen SA32 8BG

**Date:**

July, 2024

**Asbri Project ref:**

24.169

**Client:**

Cwm Environmental Ltd



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<b>Date</b>	July, 2024	July, 2024
<b>Revision</b>	-	-

<b>Section 1</b> Introduction	5
<b>Section 2</b> Site Context and Analysis	7
<b>Section 3</b> Vision and Brief	10
<b>Section 4</b> Interpretation	11
<b>Section 5</b> Planning Policy	13
<b>Section 6</b> The Proposal	21
<b>Section 7</b> Planning Appraisal	23
<b>Section 8</b> Conclusion	26

## SITE IN REGIONAL CONTEXT



# INTRODUCTION

1.1 The purpose of a Planning, Design & Access Statement (PDAS) 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 (right), extracted from Chapter 3 of Planning Policy Wales 11, 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 statement is subdivided into nine sections, commencing with a brief overview of the site context and analysis in Section. Section 3 provides the vision and brief of the proposal. Section 4 interprets and applies the context of the brief and vision for the site, whilst Section 5 summarises the relevant planning policy. Section 6 sets out the proposal, explores the relevant design and access facets associated with the application and provides a response to planning policy. Section 7 comprises a planning appraisal. The document then concludes under Section 8

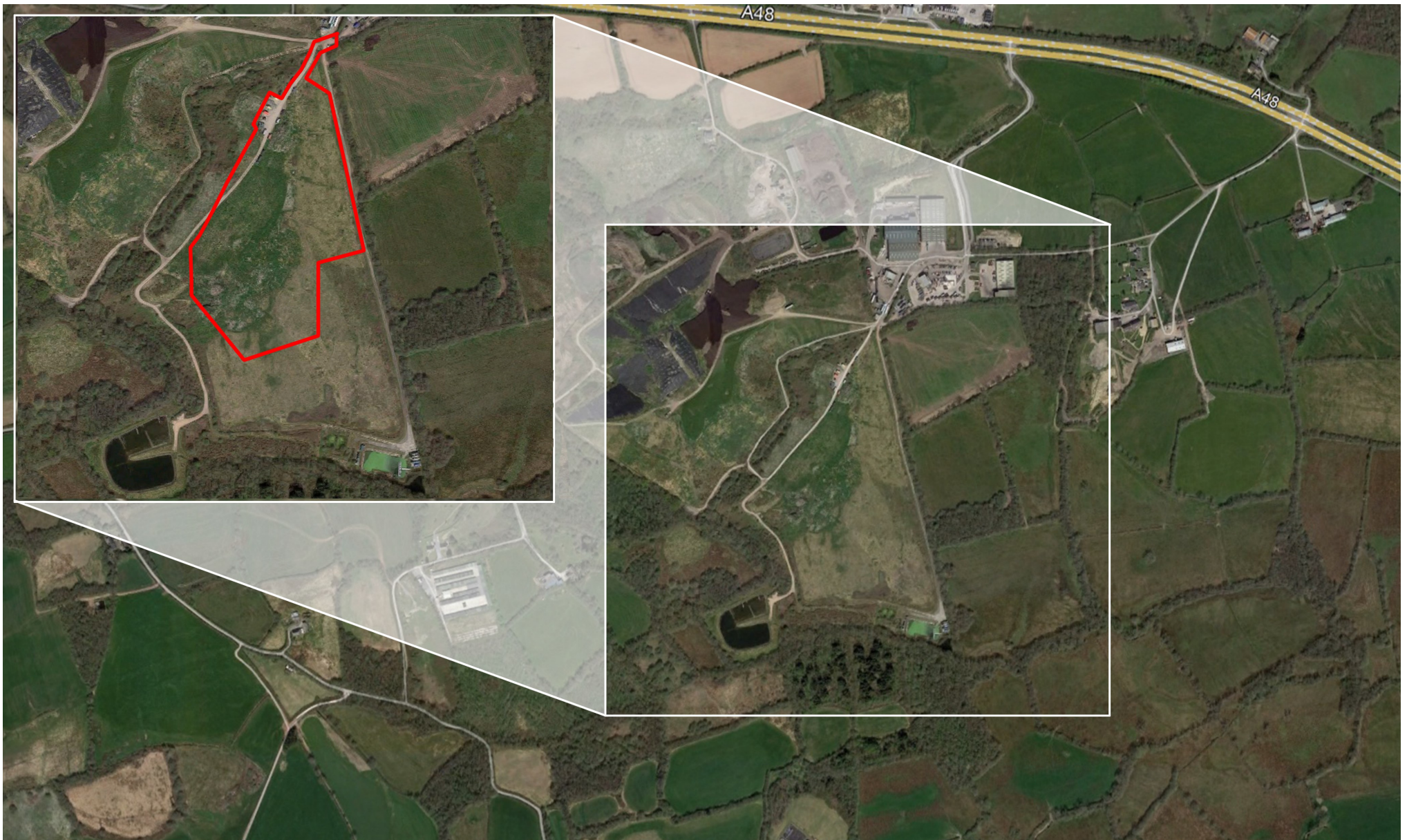
1.4 This PDAS has been prepared on behalf of Cwm Environmental to accompany a full planning application comprising the proposed solar farm with associated works at land at Nantycaws Waste Management Facility, Llanddarog Road, Nantycaws, Carmarthen SA32 8BG



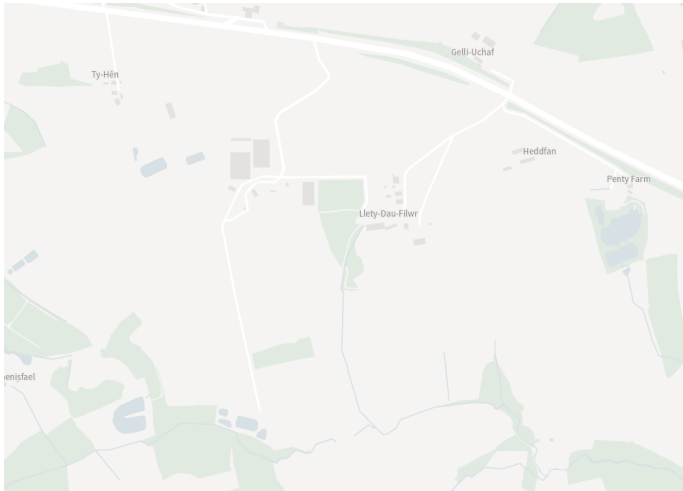
Document/drawing	Prepared by
Application Form	Asbri Planning
Planning, Design and Access Statement	Asbri Planning
Site Location Plan	Vital Energi
Site Layout Plan	Vital Energi
Substation Details	Vital Energi
Inverter Details	Vital Energi
Battery Details	Vital Energi
Topographical Survey	Centre Point Surveys Ltd
Landscape and Visual Statement	Tir Collective
Landscape Management Plan	Tir Collective
Soft Landscape Plan	Tir Collective
Green Infrastructure Strategy	Tir Collective
Drainage Strategy	CB3
Preliminary Ecological Assessment	Wyndrush Wild
Construction Traffic Management Plan	Asbri Transprot
Desktop Ground Investigation Report	ESP
Treey Survey	ArbTS
Ground Cover Report	Geo Technology

PLANNING, DESIGN & ACCESS STATEMENT

## SITE IN LOCAL CONTEXT



## SITE CONTEXT AND ANALYSIS



NRW Development and Advice Map



NRW Flood Map for Planning

### Overview

2.1 This section sets out the site's general location and provides a brief description of the application site and its immediate surroundings.

### General Location and Surroundings

2.2 The site is located within the grounds of Nantycaws Waste Management Facility. The waste management facility is located 8.4km east of Carmarthen, and to the south of the A48. It centres on the following grid coordinates: E: 247193, N: 217264

2.3 The site is surrounded by the other lands which is part of the Nantycaws Waste Management Facility and the main buildings of the waste management facility is located at the north of the application site.

### Site Features

2.4 The proposed site comprises part of an old landfill site, capped with at least a metre of soil and covered in grassland.

2.5 The topography of the site is relatively flat, slopes gently to the south and east. The site also widens up at the southern section, which is considered well suited for a solar development.

### Site Context

2.6 A review of the TAN:15 development advice map (left) identifies the site within Flood Zone A, considered to be at minimal risk to flooding. The Flood Map for planning also echoes the above by stating that the site is located within Flood Zone 1. It is therefore considered that there is no need to consider flooding any further.

2.7 A review of Historic Wales Maps identifies there are no listed buildings within the site boundary or within close proximity to the site.

2.8 Within the adopted Carmarthenshire County Council Local Development Plan (LDP), the site is delineated as the Nantycaws Waste Management Site (Policy WPP1).

2.9 Whilst the Revised Local Development Plan (RLDP) application site is located within the Nantycaws Regeneration and Mixed Use Site, which is allocated for mixed use development.

### Access and Movement

2.10 The Nantycaws facility has a dedicated access road accessed directly off the A48. A central division allows access for both east and west bound traffic.

2.11 There is no pedestrian or cyclist provision in the vicinity of the site. The closest cycle route to the site is NCN Route 47 which lies approximately 5km to the east of the application site.

2.12 The nearest bus stop to the site is located approximately 200m to the west of the junction of the Llanddarog Road / A48 priority junction. This bus stop is served by service 129 which provides access to Carmarthen town Centre and Bus Station. The service operates between 06:52 and 19:25 Monday—Friday with approximately 1 service every 2 hours.

### Planning History

2.13 A search of the Carmarthenshire Council online planning register has been undertaken. The search did not identify any historic application associated with the subject site since 2007. However, it is noted that the site was previously used as a landfill site.

2.14 It should also be noted that the wider Nantycaws Waste Management Facility is subject to the following major application:

- W/20685 – Borrow pit for engineering purposes (landfill

and general access / haul road construction – **Fully Granted**

- W/25436 – The construction of an industrial style material recycling facility (MRF) building and associated yards, roads, car and lorry parks, sewers and drainage, storage areas, security fencing and landscape. The building will be fitted out with fixed and mobile mechanical equipment and will accept and deal with all types of non-hazardous wastes with the aim of pre-treating, recycling, sorting and bulking the waste streams, sorted materials will be transferred from the facility to the end recycler or appropriate end disposal point. A commercial civic amenity is proposed on land adjoining the facility – **Fully Granted**
- W/26143 – Erection of Single 500kW wind turbine and associated transformer enclosure – **Fully Granted**
- W/30275 – Provision of waste storage shed – **Fully Granted**
- W/39912 – Construction of 2-storey ancillary modular office building – **Fully Granted**
- PL/01161 – Proposed full planning application for an extension to the existing municipal recycling facility together with construction of covered storage bays, a roof cover to the existing yard and associated infrastructure works – **Fully Granted**
- PL/01455 – Formation of earth bund with associated landscaping – **Fully Granted**
- PL/01679 – Proposed full planning application for a Household Waste recycling, re-use and upcycle sector including parking and associated infrastructure works – **Fully Granted**
- PL/05771 – Construction of new MRF building, external storage bays and associated works – **Fully Granted**
- PL/07616 - Engineering operations comprising

formation of plateau to enable future development - **Pending**



## SITE PHOTOGRAPHS



Existing Access to the Nantycaws Waste Management Facility



Grassland on the application site



Existing Road within the Nantycaws Waste Management Facility that provides direct access to the application site



Existing Structures located within close proximity to the application site



A48 which provides vehicular access to the Nantycaws Waste Management Facility



Application Site from the Nantycaws Waste Management Facility

## THE VISION AND BRIEF

### The Vision

3.1 The vision for the scheme is to reduce carbon emission for the Nantycaws Waste Management Facility and the surrounding area.

3.2 It is the intention of the applicant strategy to reduce carbon emission in the near future to mitigate the effect of climate change. It is noted that the applicant was previously utilising the landfill gas generated from the historic landfill site but it will run out shortly. It is therefore become necessary to seek alternative source of renewable energy to continue the applicant's decarbonising strategy.

3.3 It is also noted that the historic landfill site has remained vacant for a number years. Given the relatively flat topography of the site, it is considered a new solar farm would be able to bring the site back to effective use.

3.4 The proposal seeks to install 2MW Ground Mount Solar PV Array on a historic landfill site to facilitate the use of clean energy on site and provide green energy to the national grid.

3.5 The Welsh Governments Energy Service has provided advice to the applicant. The proposals wholly align with national planning policy objectives of re-use of brownfield land. Paragraph 5.7.3 of PPW states:

*"...priorities contribute to reducing carbon emissions, as part of our approach to decarbonisation, whilst enhancing the economic, social, environmental and cultural well-being of the people and communities of Wales, in order to achieve a better quality of life for our own and future generations."*

### The Brief

3.6 The proposed development comprises of the proposed solar farm with associated works at the Nantycaws Waste Management Facility

3.7 The arrays will require minimal piling works and in order to maximise solar exposure, they will be orientated in a southern direction and tilted accordingly.

3.8 In order to facilitate the operation of the solar farm, the development will require the provision of a substation and cable running along the site's northern boundary to connect to an existing substation which is located at the northeast of the site. The electricity collected will mainly be consumed by the Nantycaws Waste Management Facility, and the excessive electricity generated will be sent to the grid.

3.9 The wider site parcel measures approximately xxx in extent. However, the area which is to be incorporate solar panels and associated equipment will not required the use of the entire site area. The application site will measure at circa xxx sq m. The site will be focused to the centre of the field parcel and comprises the following areas:

- The solar array area
- The cable trench
- The access road

3.10 As shown on the accompanying plans, it is proposed that access will be attained via the northwestern corner of the site.

3.11 In order to achieve the vision, a planning application will be submitted to Carmarthenshire County Council representing a sizeable contribution to the Welsh Government decarbonisation target.

## INTERPRETATION

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

- Full site analysis including a full desktop study of the site and its surroundings;
- Discussions with the client and a full understanding of the brief and vision of the project.

4.2 The above steps have presented the key opportunities and constraints for the site, which are outlined below:

### 4.3 Opportunities

**Development Limit** - The application site is wholly within the Nantycaws Waste Management site, which will be safeguarded for the continuation and/or provision of waste management facilities.

**Site Ownership** - The entire site is under the ownership of Cwm Environmental Ltd.

**Low Flood Risk** - The site is located within Flood Zone 1 and as such is considered to be of low or no risk of fluvial/coastal flooding. In addition, the NRW development advice map identifies the site to be located within Flood Zone A, as such is considered to be at no risk of fluvial or coastal/tidal flooding.

**Neighbouring Uses** - There are no neighbouring buildings or properties as such in terms of visual amenity the proposal will have a negligible impact.

**Existing Access** - The site has an established point of access via the A48 Trunk Road.

**Site Orientation** - the site has large expanses of open areas allowing a southerly configuration to be achieved for the solar arrays achieving maximum solar gain.

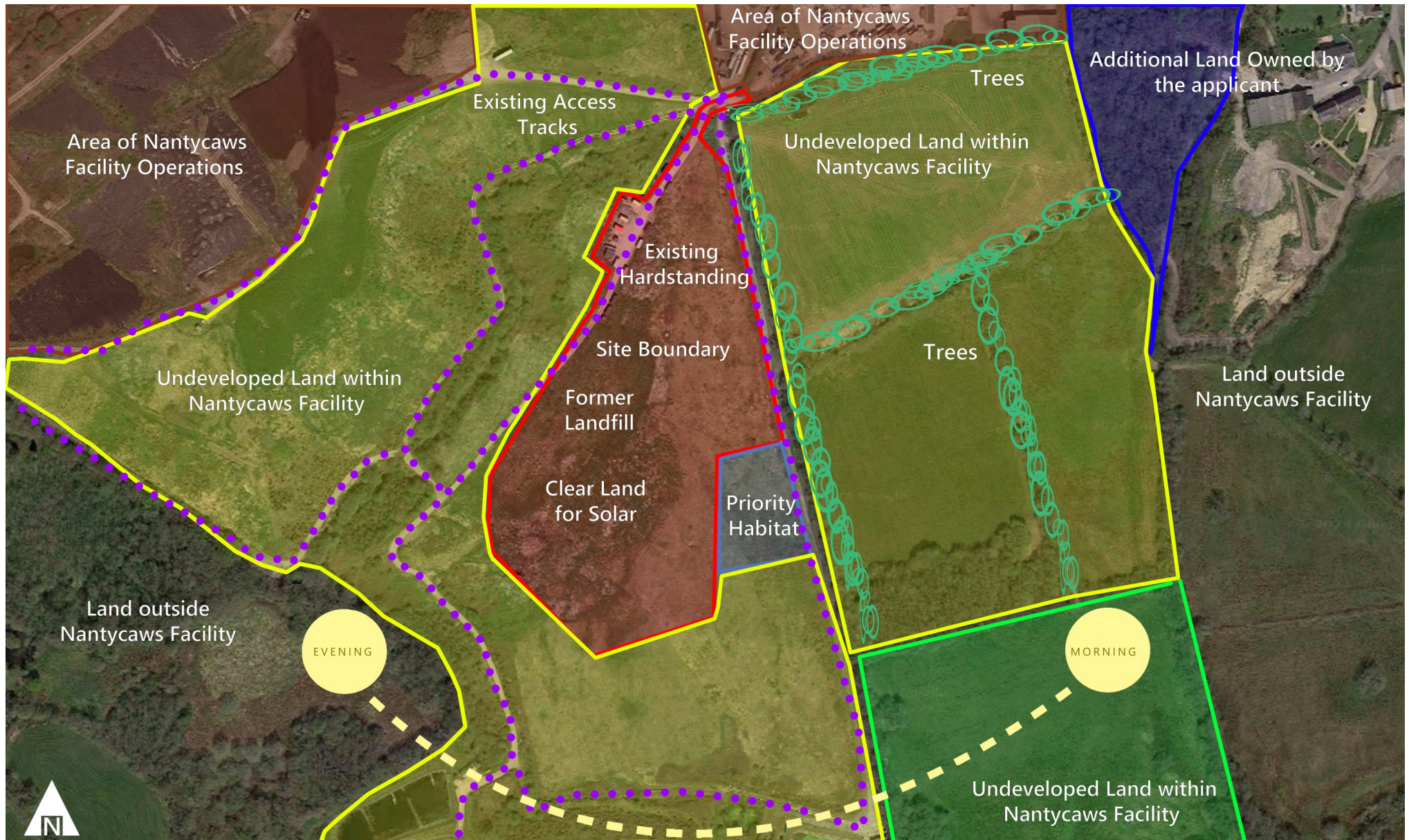
### 4.4 Constraints

**Historic Landfill Site** - Contaminant is likely to be present on site and a site investigation report is required to confirm ground condition of the site.

**Priority Habitats** - The south eastern section has been identified as a priority habitat (Purple moor-grass and Rush-pastures).

**Grid Capacity** - the grid has a finite amount of capacity to accommodate new solar developments. There is capacity confirmed for this development.

# OPPORTUNITIES AND CONSTRAINTS



## PLANNING POLICY



### Planning Policy Overview

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:

- National Development Framework: Future Wales - The National Plan 2040 (February, 2021);
- Prosperity for all: A Low Carbon Wales (Low carbon delivery plan) (March, 2019)
- Carmarthenshire Local Development Plan (adopted December 2014).

5.2 In addition to the Development Plan, the Planning Application has been informed by policy and guidance set out in the following:

- Planning Policy Wales Edition 12 (February, 2024), informed by The Well -Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
- Building Better Places: The Planning System Delivering Resilient and Brighter Futures (July, 2020);
- Swansea Council Supplementary Planning Guidance.

5.3 This section of the PDAS provides an overview of the Development Plan context and planning policy framework of specific relevance to the determination of this application. For ease of reference, this overview is set out below at the national and local level.

### National Level Legislation

5.4 In respect of national legislation, The Climate Change Act became law on 26 November 2008. One of the key

provisions of the Act is the introduction of legally binding targets on greenhouse gas emissions comprising reductions through action in the UK and abroad of at least 80% by 2050. Targets also include and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline. The generation of electricity by renewable means such as solar energy can be a key contributor towards meeting these targets.

5.5 The Energy Act was made law in December 2013 and includes provision on decarbonisation and electricity market reform which comprises replacing current generation capacity and upgrading the grid to deal with rising demand.

### **Prosperity for all: A Low Carbon Wales (Low carbon delivery)**

5.6 Published in March 2019, the low carbon delivery plan sets the foundations for Wales to transition to a low carbon nation. Cutting emissions and moving towards a low carbon economy brings opportunities around clean growth for business, as well as wider benefits for people and the environment. The Plan sets out the action Welsh Government will take to cut emissions and support the growth of a low carbon economy in a way that maximises the wider benefits for Wales, ensuring a fairer and healthier society.

5.7 The plan sets out Welsh Government's ambition for the public sector to be carbon neutral by 2030. In accordance with this ambition, a number of public bodies have declared a climate emergency and targeted achieving carbon neutrality by 2030.

### **The Well -Being of Future Generations (Wales) Act 2015**

5.8 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires "public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle". The Act

## PLANNING POLICY



sets out seven 'well-being' goals as follows:

- A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.
- A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
- A healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
- A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
- A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.
- A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
- A globally responsive Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

5.9 Within the Act, sustainable development is defined as follows: "the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals". The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

### **National Development Framework: Future Wales – The National Plan 2040**

5.10 The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. 'Future Wales' sets out the Welsh Government's 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. As stated above, the National Development Framework has Development Plan status.

5.11 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. The 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years' time which are as follows:

A Wales where people live:

- 1....and work in connected, inclusive and healthy places
- 2....in vibrant rural places with access to homes, jobs and services
- 3.... in distinctive regions that tackle health and socio-economic inequality through sustainable growth
- 4....in places with a thriving Welsh Language

# FUTURE WALES REGIONAL STRATEGIC DIAGRAM

## Regional strategic diagram



## PLANNING POLICY

5....and work in towns and cities which are a focus and springboard for sustainable growth

6....in places where prosperity, innovation and culture are promoted

7....in places where travel is sustainable

8. ....in places with world-class digital infrastructure

9....in places that sustainably manage their natural resources and reduce pollution

10....in places with biodiverse, resilient and connected ecosystems

11....in places which are decarbonised and climate-resilient

### Growth Strategy

5.12 The Welsh Government's strategic growth strategy is set out in Policy 1 of Future Wales as follows:

#### *Policy 1 – Where Wales will Grow*

*The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:*

- *Cardiff, Newport and the Valleys*
- *Swansea Bay and Llanelli*
- *Wrexham and Deeside*

*The National Growth Areas are complemented by Regional Growth Areas which will grow, develop and offer a variety of public and commercial services at regional scale. There are Regional Growth Areas in three regions:*

- *The South West*
- *Mid Wales*
- *The North*

6.9 The site lies within the South Wales region, Policy 29 of the plan is therefore application and states:

*The Welsh Government supports sustainable growth and regeneration in Carmarthen and the Pembrokeshire Haven Towns (Haverfordwest, Milford Haven, Pembroke and Pembroke Dock). These areas will be a focus for managed growth, reflecting their important sub-regional functions and strong links to the National Growth Area of Swansea Bay and Llanelli.*

*Strategic and Local Development Plans should recognise the roles these places as a focus for housing, employment, tourism, public transport and key services within their wider areas and support their continued function as focal points for sub-regional growth.*

### Renewable Energy

5.13 In respect of climate change, the Plan confirms that:

*It is vital that we reduce our emissions to protect our own well-being and to demonstrate our global responsibility. Future Wales together with Planning Policy Wales will ensure the planning system focuses on delivering a decarbonised and resilient Wales through the places we create, the energy we generate, the natural resources and materials we use and how we live and travel.*

5.14 Concerning renewable energy it states:

*Wales can become a world leader in renewable energy technologies. Our wind and tidal resources, our potential for solar generation, our support for both large and community scaled projects and our commitment to ensuring the planning system provides a strong lead for renewable energy development, mean we are well placed to support the renewable sector, attract new investment and reduce carbon emissions.*

5.15 Policy 17 of the Plan relates to Renewable and Low

Carbon Energy and Associated infrastructures and stipulates:

*The Welsh Government strongly supports the principle of development renewable and low carbon energy from all technologies and at all sales 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.*

*In Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in Policy 18.*

*Applications for large-scale wind and solar will not be permitted in National Parks and Areas of Outstanding natural Beauty and all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment.*

*Proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improved to local communities.. New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities. The Welsh Government will work with stakeholders, including National Grid and Distribution Network Operators, to transition to a multi-vector grid network and reduce the barriers to the implementation of new grid infrastructure.*



## PLANNING POLICY

### Biodiversity and Green Infrastructure

5.16 It is identified at Page 76 that the strategic focus of Future Wales on urban growth requires “an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable” (page 76).

5.17 In addition, the associated importance of green infrastructure is highlighted: “As the population of Wales becomes increasingly urban, the opportunity to optimise well-being benefits from green infrastructure will be greatest in and around these areas. Innovative use of nature-based solutions and integrating green infrastructure in and around urban areas can help restore natural features and processes into cities and landscapes. Providing locally accessible, high quality green spaces and corridors helps to maintain and enhance the strategic functioning of our natural resources and ecological networks and address physical and mental well-being” (page 78).

5.18 Policy 9 of Future Wales is of key relevance in regard to green infrastructure and biodiversity enhancement, which states the following:

*Policy 9—Resilient Ecological Networks and Green Infrastructure*  
To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

- identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and
- identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth,

*ecological connectivity, social equality and well-being*

### **Planning Policy Wales Edition 12**

5.19 Planning Policy Wales (PPW) Edition 12 was published in February 2024. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015.

5.20 Sustainable Development is defined at Page 7 of PPW as follows: “the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”.

5.21 Paragraph 1.18 set out that “Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated”.

5.22 In addition, it is highlighted that good design promotes environmental sustainability and contributes to the achievement of the well-being goals - Paragraph 3.7 states for example that “Developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution”.

5.23 The importance of good design in term of ensuring high environmental quality is set out at Paragraph 3.8: “Landscape and green infrastructure considerations are an

*integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these functions together to contribute toward the quality of places”.*

### Renewable Energy

5.24 Section 5—Production and Enterprising Places covers the economic components of placemaking which promote the economic, social, environmental and cultural well-being by providing well-connected employment and sustainable economic development. These places are designed and sites to promote healthy lifestyles and tackle climate change.

5.25 Paragraph 5.7.1 emphasises that low carbon electricity must become the main source of energy in Wales. Renewable electricity will be used to provide both heating and transport in addition to power. The future energy supply mix will depend on a range of established and emerging low carbon technologies, including biomethane and green hydrogen.

5.26 The key issues in these theme include encouraging policies and proposals which promote low carbon developments and sites for renewable energy, manufacturing, research and development close to areas of deployment of renewable energy.

5.27 Paragraph 5.7.14 establishes Welsh Government’s targets for the generation of renewable energy which are as follows:

- For Wales to generate 70% of its electricity consumption from renewable energy by 2030;
- For one Gigawatt of renewable capacity in Wales to be locally owned by 2030; and
- For new energy projects to have at least an element of local ownership

## PLANNING POLICY

5.28 Paragraph 5.7.15 goes onto state:

*“The planning system has an active role to help ensure the delivery of these targets, in terms of new renewable energy generating capacity and the promotion of energy efficiency measures in buildings.”*

### Sustainable Drainage Systems (SuDS)

5.29 The importance of considering SuDS as an integral part of the development process is highlighted at Paragraph 6.6.18 of PPW where it is stated that *“The provision of SuDS must be considered at the earliest possible stage when formulating proposals for new development”*. It is advised at Paragraph 6.6.19 that *“Design for multiple benefits and green infrastructure should be secured wherever possible and as part of Green Infrastructure Assessments suitable approaches towards the provision of SuDS should be identified”*.

### **Technical Advice Notes**

5.30 The following Technical Advice Notes (TANS) are of relevance to the development proposal.

5.31 TAN 5 Nature Conservation and Planning (2009): provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It seeks to demonstrate how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it.

### Local Level

#### **Carmarthenshire Climate Emergency**

5.32 On 20th February 2019, Carmarthenshire County Council declared a climate emergency. In doing so, the Council has committed to becoming a net zero carbon local authority by 2030.

### **Carmarthenshire Local Development Plan**

5.33 The Carmarthenshire Local Development Plan was adopted in 2014 and is the prevailing development plan for the County.

5.34 The LDP policies considered relevant in the context of the proposed development are contained within the table on the next page

5.35 Nantycaws Waste Site has its own policy within the adopted Carmarthenshire LDP: ‘Policy WPP1 – Nantycaws Waste Management Facility’. The Policy states:

*“The Nantycaws waste management site will be safeguarded for the continuation and/or provision of the following range of waste management facilities, including those catering for the pre-treatment of wastes and the treatment of residual wastes:*

- a. Landfill
- b. Composting
- c. Energy from waste
- d. Materials recovery
- e. Civic amenity site
- f. Anaerobic Digestion Plant”

5.36 Policy SP2 is in relation to Climate Change and states:

*“Development proposals which respond to, are resilient to, adapt to and minimise for the causes and impacts of climate change will be supported. In particular proposals will be supported where they:*

- a. Adhere to the waste hierarchy and in particular the minimisation of waste;
- b. Promote the efficient consumption of resources (including water);
- c. Reflect sustainable transport principles and minimise the need to travel, particularly by private motor car;
- d. Avoid, or where appropriate, minimise the risk of flooding including the incorporation of measures such as SuDS and flood resilient design;

- e. Promote the energy hierarchy by reducing energy demand, promoting energy efficiency and increasing the supply of renewable energy;
- f. Incorporate appropriate climate responsive design solutions including orientation, layout, density and low carbon solutions (including design and construction methods) and utilise sustainable construction methods where feasible.

*Proposals for development which are located within areas at risk from flooding will be resisted unless they accord with the provisions of TAN 15.”*

5.37 In relation to Renewable Energy and Energy Efficiency, Policy SP11 stipulates:

*“Development proposals which incorporate energy efficiency measures and renewable energy production technologies will be supported in areas where the environmental and cumulative impacts can be addressed satisfactorily. Such developments will not cause demonstrable harm to residential amenity and will be acceptable within the landscape. Each proposal will be assessed on a case by case basis.”*

5.38 In relation to proposals for non-wind Renewable Energy Installations within development limits, Policy RE3 identifies that:

*“Proposals for non-wind renewable energy installations will be permitted within defined Development Limits, provided they do not cause an unacceptable impact to the character of the local area and to the amenity of adjacent land, properties, residents and the community. Proposals will not be permitted if they negatively impact upon archaeology or the setting and integrity of Conservation Areas, Listed Buildings or other features or areas of historical value.”*

# PLANNING POLICY

Policy reference	Relating to
SP1	Sustainable Places and Spaces
SP2	Climate Change
SP11	Renewable Energy & Energy Efficiency
GP1	Sustainability and High Quality Design
TR2	Highways in Developments - Design Considerations
EQ4	Biodiversity
EQ5	Corridors, Networks and Features of Distinctiveness
RE3	Non-Wind Renewable Energy Installations
EP3	Sustainable Drainage
WPP1	Nantycaws Waste Management Facility



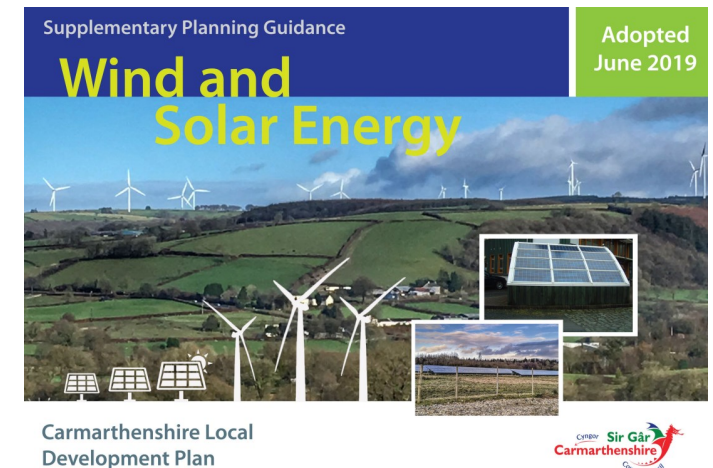
### Supplementary Planning Guidance

5.39 The following adopted supplementary planning guidance are considered relevant to the proposal:

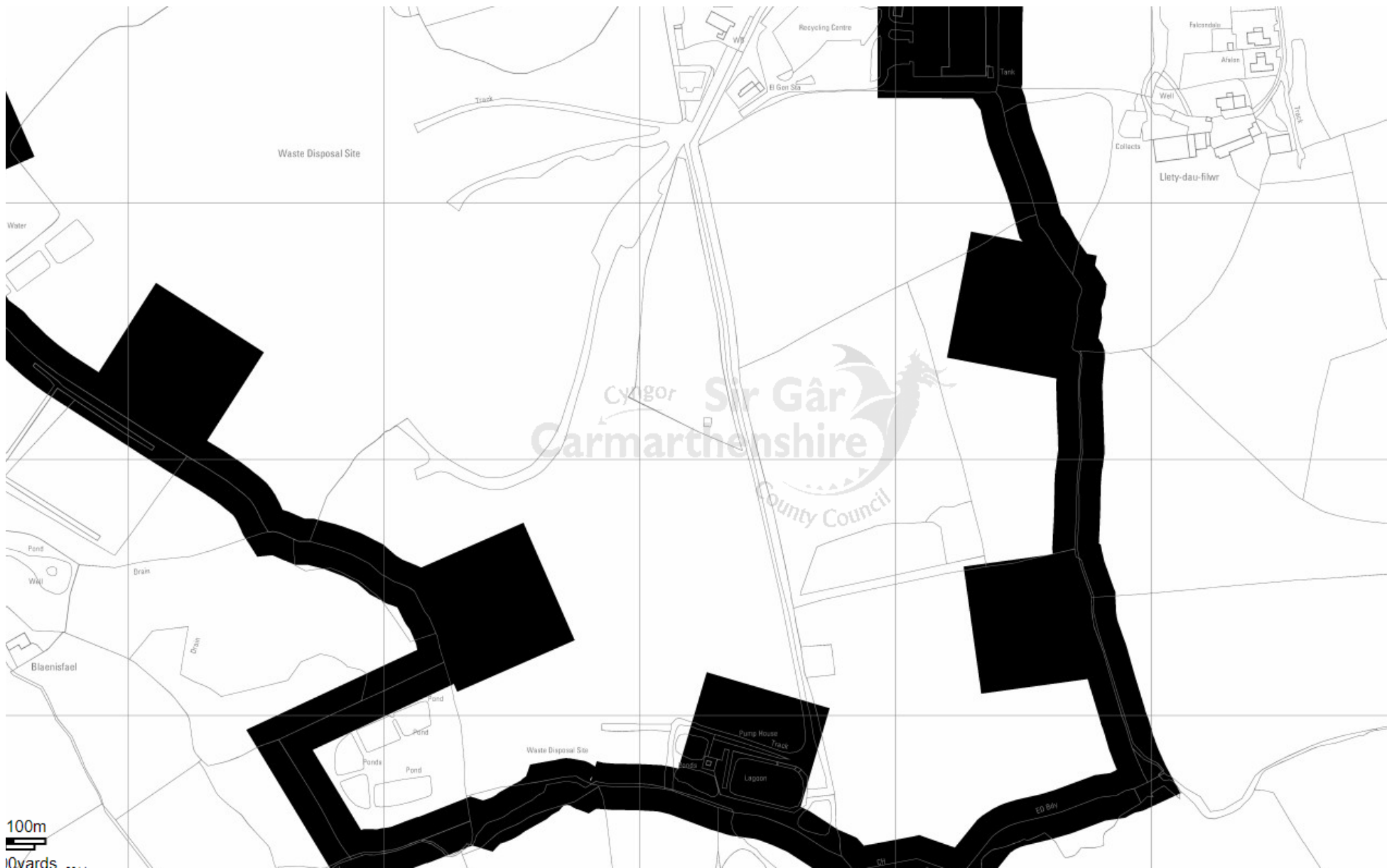
- Nature Conservation and Biodiversity
- Wind and Solar

### Carmarthenshire Replacement Local Development Plan (RLDP)

5.40 Whilst the Revised Local Development Plan (RLDP) has not been adopted, it will serve as a material concern to planning application where applicable. The application site is located within the Nantycaws Regeneration and Mixed Use Site, which is allocated for mixed use development (ref: PrC1/MU3). RLDP Policy SG 1 (Regeneration and Mixed-Use Sites) stated that the site offers the future opportunity to potentially harness energy from waste, and related employment-based activities.



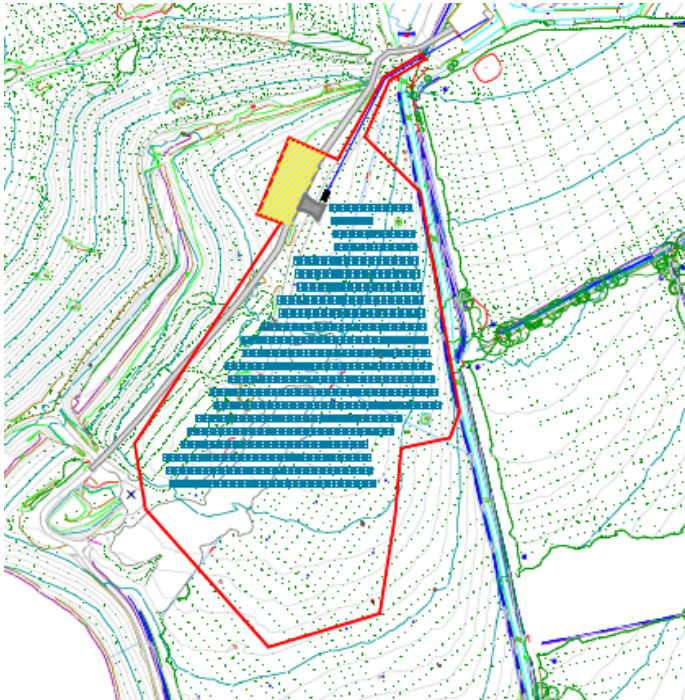
# LDP PROPOSALS MAP



100m  
100yards

JULY, 2024

## THE PROPOSAL



**Proposed Site Layout**

### Overview

6.1 This PDAS relates to a full planning application comprising the proposed solar farm and associated works at land at Nantycaws Waste Management Facility, Llanddarog Road, Nantycaws, Carmarthen SA32 8BG.

### Access and Movement

6.2 As previously mentioned, the Nantycaws facility has a dedicated access road accessed directly off the A48. A central division allows access for both east and west bound traffic.

6.3 As shown on the accompanying General Arrangement plan, it is proposed that access will be attained via the northwestern boundary of the site.

6.4 Given the nature of the development the construction period will be the phase with the most associated traffic movements. A Construction Traffic Management Plan has been prepared by Asbri Transport confirms an estimated 3 trips per day by construction traffic assuming a three-month construction period working Mon-Fri.

6.5 Once installed, there will be minimal on-site activity limited to standard maintenance procedures. As such, it is considered that the proposed development will have a negligible impact on the surrounding highway network.

### Character

6.6 The arrays will require minimal ground works and in order to maximise solar exposure, they will be orientated in a southerly direction and tilted accordingly.

6.7 In order to facilitate the operation of the solar farm, the development will require the provision of a substation and cable running along the site's northern boundary to connect to an existing substation which is located at the northeast of

the site. The electricity collected will mainly be consumed by the Nantycaws Waste Management Facility, and the excessive electricity generated will be sent to the grid

6.8 The application site will measure at circa xxx. The site will be focused to the centre of the field parcel and comprises the following areas:

- The solar array area:
- The cable trench
- The access road

6.9 It should be emphasised that Cwm Environmental has agreed grid capacity with the National Grid, subject to planning approval.

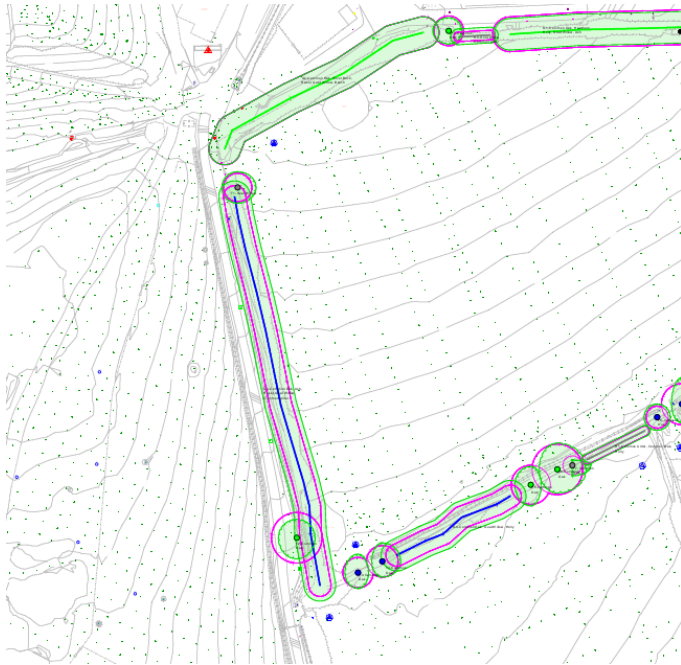
### Appearance

6.10 The appearance of the development will comprise typical solar PV arrays which are low lying. Visual effects of the site would be contained due to the restricted nature of views, which are often screened by boundary hedgerows and trees.

### Landscape and Biodiversity

6.11 A Landscape and Visual Statement has been prepared by Tir Collective to support this application. It concludes that the site represents an opportunity to accommodate the proposed development. The solar development would retain and incorporate existing key landscape features such as topography and proposed hedgerows planting would help to restore field pattern. The landscape strategy for the site includes avoiding development on the main area mapped as marshy grassland. The adjoining semi-improved neutral grassland where the arrays are proposed would be managed towards a more species-rich grassland through late summer mowing with associated removal of arisings. The landscape setting of the site includes man-made forms and energy infrastructure along which solar arrays would not be incongruous and may positive contribute to the restored landscape.

## THE PROPOSAL



**Tree Constraints Plan showing proximity of trees at eastern boundary**

6.12 In light of the above, a comprehensive landscaping strategy is submitted to support this application.

6.13 In terms of biodiversity, a Preliminary Ecological Appraisal (PEA) is also prepared by Wyndrush Wild to support the application. The site has limited potential for protected species, including forage bats, grass snakes and a small number of birds. It is considered that the protected species on site is unlikely to be affected provided any clearance work is carried out in a considered and timely manner.

6.14 However, it is noted that the southeastern section of the site is considered as a Priority Habitat (Purple moor-grass and Rush-pastures). It is therefore recommended that the development footprint avoids the Priority Habitats areas to achieve biodiversity net gain, which has been reflected in the site layout.

6.15 The proposals have therefore appropriately considered PPW12 requirements to follow a stepwise approach with the first step being avoidance.

### **Environmental Sustainability**

6.16 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.

6.17 In this respect, the solar farm will fundamentally underpin the Nantycaws Waste Management Facility's ability to conserve natural resources, minimise carbon generation and help deliver zero carbon standards by providing a significant level of renewable energy.

6.18 The application site is already visually contained by substantial natural buffer in the form of mature hedgerows and trees and these will be retained and reinforced where necessary to achieve complete curtailment and comprehensive screening of the site from external

viewpoints. In addition to the benefits associated with curtailment and screening, the retention and reinforcement of the hedgerows would also preserve and enhance the environmental sustainability of the site.

### **Community Safety**

6.19 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 guideline, in order to ensure the site remains secure from outside influence. As such, the impact of development on safety is considered acceptable.

## PLANNING APPRAISAL

7.1 This section aims to identify the main considerations 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:

- Principle of development;
- Impact of Visual Amenity
- Access and Highway Considerations
- Impact on Biodiversity
- Other Material Considerations

### Principle of Development

7.2 The increase in renewable energy generation is seen to be of paramount importance within the UK in order to reduce overall CO2 emissions by 100% by 2050. Projects such as the subject of this application will help assist in the mitigation of climate change through the provision of an alternative source to reduce the reliance of fossil fuels.

7.3 In planning terms, policy support for renewable energy projects is contained within Planning Policy Wales. Of particular relevance is paragraph 5.7.1, which reaffirms that the overall commitment to tackle climate change and increase energy security is of paramount importance.

7.4 Similarly, at a local level the Carmarthenshire Local Development Plan is committed to reducing carbon emissions in order to combat climate change. The proposed development will assist Cwm Environmental in reducing their carbon emissions and contribute renewable energy to the national grid. In doing so, the scheme will contribute to the Council's commitment to becoming a net zero carbon authority by 2030 in accordance with their declaration of a climate emergency

7.5 It is noted that the application site is located within the Nantycaws Waste Management Facility Area. Policy WPP1

(Nantycaws Waste Management Facility) note that the site will be safeguarded for the continuation of the waste management facility.

7.6 It is acknowledged that the application site was previously used as a landfill site and the site itself has a limited scope for future development. The solar proposals are considered to be a suitable development opportunity. It is therefore the intention of the applicant to use the site for a solar farm to support the daily operation of the site and to reduce carbon generation for the local area. The proposal will also bring the vacant site back into effective use. In this regard, it is considered that the proposed development at the application site is in accordance with LDP Policy WPP1 and Planning Policy Wales. As the solar development could be decommissioned in the future the proposals will not result in permanent removal of the land from future development opportunities.

7.7 Policy RE3 (Non-wind Renewable Energy Installations) states that proposals within development limits will be permitted providing they do not cause an unacceptable impact to the character of the local area and to the amenity of adjacent land, properties, residents and the community. In addition, proposals will not be permitted if they negatively impact upon archaeology or the setting and integrity of Conservation Areas, Listed Buildings or other features or areas of historical value..

7.8 It should be emphasised that the site is located within the Nantycaws Waste Management Facility area in the adopted LDP. It is earmarked for some form of development therefore the potential impact of development on the character and appearance of the area and on adjacent land would have been considered and was found to be acceptable. The Landscape Visual Impact Assessment submitted along this application to demonstrate that the

proposal will not lead to a detrimental visual impact to the local area.

7.9 Given the site is a former landfill it is highly unlikely that any significant archaeological remains would be encountered.

7.10 In light of the above, the principle of developing the proposed solar farm and associated works at land at Nantycaws is firmly established.

### Impact of Visual Amenity

7.11 A Landscape and Visual Statement has been prepared by Tir Collective to support this application. It concludes that the site represents an opportunity to accommodate the proposed solar development. The solar development would retain and incorporate existing key landscape features such as topography and proposed hedgerow planting which would help to restore field pattern. The landscape strategy for the site includes avoiding development on the main area mapped as marshy grassland, as this is referred to the Priority Habitat (please refer to the Biodiversity Section). The adjoining semi-improved neutral grassland where the arrays are proposed would be managed towards a more species-rich grassland through late summer mowing with associated removal of arisings.

7.12 The landscaping strategy would help to integrate the proposed solar farm and ancillary structures into landscape whilst minimising any potential impacts on landscape character. Whilst the site would change from rough pasture, the characteristic rolling agricultural landscape would appropriately accommodate the development and changes would be fully restored following decommissioning, incorporating landscape enhancement through planting and management. The landscape setting of the site includes man-made forms and energy infrastructure alongside which solar arrays would not be incongruous and may positively contribute to the restored landscape.

## PLANNING APPRAISAL

7.13 A comprehensive landscape strategy has been submitted to support the application.

7.14 In light of the above, it is considered that the proposed development will not have a detrimental impacts in terms of visual amenity to the surrounding area, and it is in accordance with the LDP Policy GP1 (Sustainability and High Quality Design).

### Access and Highway Considerations

7.15 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. However, once established, the solar farm will require minimal personnel on site, as such will result in a negligible impact on the surrounding highway network.

7.16 A Construction Traffic Management Plan has been prepared by Asbri Transport to support this application. It confirms that hours of construction will be from 07:00 - 18:00 Monday to Friday and between 07:00 to 17:00 on Saturdays. Deliveries would be scheduled to avoid the highway network peak hours between 08:00 to 09:00 in the morning and 17:00 - 18:00 in the afternoon.

7.17 It is intended that all deliveries will be carried out by vehicles that fall within the current UK limits. Based on the nature of the development, the forecast total of 110 two-way construction vehicle movements will be spread along the whole construction period with no more than a handful of vehicle expected on site during any given day.

7.18 In addition, all deliveries vehicles will be restricted to a left-in /left out arrangement at the junction with the A48, truing at Pensarn roundabout for existing vehicles.

7.19 In light of the above, it is considered that the proposed

development will not raise significant concern on highway going forward, and it is therefore considered that the proposal is in accord with LDP Policy TR3 (Highways in Developments—Design Considerations).

### Impact on Biodiversity

7.20 The application submission is accompanied by a Preliminary Ecological Appraisal (PEA) produced by Wyndrush Wild, with a summary of the report provided below.

7.21 The PEA stated that the site has limited potential for protected species, including forage bats, grass snakes and a small number of birds. It is considered that the protected species on site is unlikely to be affected provided any clearance work is carried work in a considered and timely manner.

7.22 However, it is noted that the southeastern section of the site is considered as a Priority Habitat (Purple moor-grass and Rush-pastures). It is therefore recommended that the development footprint avoids the Priority Habitats areas to achieve biodiversity net gain.

7.23 As shown on the site layout, the solar array will be installed outside the priority habitat area to protect the important habitat in the local area, and the biodiversity of the site will be enhanced as part of the landscaping strategy through wildflowers planting within the site boundary

7.24 In addition to the PEA, this application is also supported by a Green Infrastructure Statement produced by Tir Collective. The statement confirms that the green infrastructure of the site and the area will be enhanced as a result of the proposed landscape measures., and a biodiversity net gain can be achieved in this proposal.

7.25 It is therefore contested that the proposal meets the requirements of Policy EQ4 (Biodiversity) and EQ5 (Corridors,

Networks and Features of Distinctiveness) of the LDP and Chapter 6 of the Planning Policy Wales Edition 12.

### Other Material Considerations

#### Drainage

7.26 From 7th January 2019, all new developments of more than 1 dwelling house or where construction area is 100m2 or more to submit a Sustainable Drainage Systems (SuDS) application demonstrating compliance with the statutory SuDS standards for the design, construction, operation and maintenance of surface water drainage systems serving new developments. It is noted that the drainage strategy for foul and surface water will be developed with regards to Schedule 3 of the Flood and Water Management Act 2010 and will therefore require a separate drainage consent from the Council's SAB Authority.

7.27 This application is accompanied by a Drainage Technical Note produced by CB3. It identifies that a watercourse is located downslope of the development site in a southerly direction, and it is anticipated that the surface water currently discharges in this direction. It is proposed that the surface water runoff from the site to be collected within various SuDS features such as swales and a detention basin. Water is to be reused through the hydration of planting. Any excessive water will be discharged to the aforementioned watercourse at greenfield rate.

7.28 In summary, the surface water drainage design will be compliant with national statutory SuDS standards and the SAB process will be adhered to in support of the proposal. It is considered that the proposal accords with Policy EP3 (Sustainable Drainage) of the LDP.

#### Trees

7.29 It is noted that mature hedgerows is located outside the site's eastern boundary



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## PLANNING APPRAISAL

7.30 The accompanied Tree Survey prepared by ArbTS stated that the hedgerows concerned are classed as Category B, which are desirable for retention. Given that these hedgerows are located outside the site boundary and the solar arrays will be set back from the hedgerows. It is considered that the proposed development will have no impact to the adjacent hedgerows.

7.31 It is therefore contested that the proposal accords with Policy EQ5 (Corridors, Networks and Features of Distinctiveness) of the LDP.

## CONCLUSION

8.1 This Planning, Design and Access Statement (PDAS) has been prepared on behalf of Cwm Environmental Ltd to accompany a full planning application comprising the proposed solar farm and associated works at land at Nantycaws Waste Management Facility, Llanddarog Road, Nantycaws, Carmarthen SA32 8BG

8.2 It is the intention of the applicant strategy to reduce carbon emission in the near future to mitigate the effect of climate change. It is noted that the applicant was previously utilising the landfill gas generated from the historic landfill site but it will run out shortly. It is therefore become necessary to seek alternative source of renewable energy to continue the applicant's decarbonising strategy. It is considered a new solar farm would be sufficient to meet the demand of green energy and bring a historic landfill site back to effective use

8.3 Both national and local policies supports the provision of renewable energy. Future Wales states that new investments on the renewable sector to reduce carbon emission should be supported by the planning system. In terms of the local level, Carmarthenshire County Council declared a climate emergency in 2019. In doing so, the Council has committed to becoming a net zero carbon local authority by 2030. LDP Policy RE3 (Non-Wind Renewable Energy Installations) also stated that solar farm proposal within the development limit will be supported.

8.4 The application site is located within the Nantycaws Waste Management Facility area in the adopted LDP the site will be safeguarded for the continuation of the waste management facility. It is acknowledge that the application site was previously used as a landfill site and the site itself has a limited scope for future development. The solar proposals are considered to be a suitable development opportunity to support the daily operation of the site and to reduce carbon generation for the local area. The proposal

will also bring the vacant site back into effective use. The principle of development is therefore considered acceptable.

8.5 The supporting LVIA considered that the landscape setting of the site includes man-made forms and energy infrastructure alongside which solar arrays would not be incongruous and may positively contribute to the restored landscape. Additionally, the traffic generated during the construction period can be accommodated through the existing highway network and a net biodiversity gain can be achieved in this proposal. It is therefore concluded that significant material concerns are unlikely to be raised going forward.

8.6 In light of the above, it is concluded that the proposal fully accords with both national and local policies and there are no material considerations which should prevent the planning application from being determined in accordance with the relevant planning policy framework.