

## Proposed Brynrhyd Solar Farm DNS/3260565

We write to object in the strongest possible way to the proposals by Brynrhyd Solar Farm Ltd, a wholly owned subsidiary of Island Green Power Ltd, to build a 160-acre solar farm on good quality agricultural land in the village of Llanedi. We live very close to the site of the proposed development and if it goes ahead will see and hear the solar panels every time, we open our front door. It will have a long-lasting effect on our residential amenity. We strongly contest the developer's claims that there would be no overbearing, overwhelming or oppressive impact on residential amenity and there are many properties, particularly along Heol Troeon Bach that will suffer even more. As with other aspects of the bid that we will mention in due course, we do not consider the assessments made by the company to be either objective or sufficient. There is no doubt whatsoever in our minds that the landscape and visual impact of the proposed scheme is significant to those of us who live here. For the landowners and the developers, it is, of course, very different, since they will probably never see the site and will certainly not live near it.

### Cumulative Effect of a third solar farm

There has been a solar farm (Clawdd Ddu Solar Farm) in Llanedi for many years and its existence is not problematic for most of the residents of Llanedi. However, permission has recently been granted for a second solar farm (Tycroes Solar Farm - DNS/3227364) which will border the existing Clawdd Ddu Solar Farm. The Brynrhyd Solar Farm would be the third solar farm in the area. We believe that the cumulative effect of a third solar farm in close proximity to two others would have a hugely detrimental effect on the villages of Llanedi and Garnswllt - on their residents, and on the environment. There is no shortage of former industrial land in East Carmarthenshire and there are already some good examples of where solar panels have been located on land that could not be used for agriculture or housing – for example on the former site of the Cynheidre colliery 3 & 4 shafts. This development would however be using good quality agricultural land that is currently used for milk and beef production.

### Landscape and Visual Impact

The visual impact of the proposed development on the countryside will be significant and detrimental to the residents of the surrounding area. The new panels would be clearly visible from many properties in the village and from Ebenezer Road (B4279) which runs from Fforest through Llanedi to Tycroes. It would turn beautiful unspoilt countryside into a mass of glaring glass and would turn good agricultural land, currently farmed by local inhabitants into an industrial site. The proposed solar farm would have an operational lifespan of 40 years, by which time the company behind the scheme might no longer be in existence, leaving a blot on the landscape for others to decommission. This part of West Wales is still dealing with effects of coal extraction and the public purse must foot the bill of clearing waste created by coal production. It is very likely that history will repeat itself when the time comes to remove the photo-voltaic cells and their supports.

The developer's application claims that once de-commissioned, the legacy will be an enhanced landscape. There is nothing in the way of evidence to support this fanciful claim. Firstly, as we understand it, the land will no longer be categorised as agricultural land and it

will be easier for developers to propose further development. We believe that it is in keeping with principles of the Well-being of Future Generations (Wales) Act 2015 to ensure that our landscape is protected from unnecessary damage. Island Green Power cannot possibly produce credible evidence to support its claim that the legacy of the scheme will be an enhanced landscape especially given that the decommissioning of solar farms has yet to be put into practice. The best that the company could state is that it would return the site to its original condition, although given the number of panels and supports that will be on the site it is very difficult to imagine that this could be done effectively.

#### Ecology and Habitat

Contrary to the claims made by the developers, building a 160-acre solar farm will not enhance biodiversity in the area. There are many species including butterflies, bats, curlews, badgers, foxes owls and red kites which would have their natural habitat destroyed by this scheme. The Environment (Wales) Act 2016 has introduced a new biodiversity duty which highlights biodiversity as an essential component of ecosystem resilience. Whilst the proposed solar panels could be located in many other places, including brownfield sites and the roofs of houses, shops and industrial units, the biodiversity of the Brynrhyd site will be damaged for ever.

The proposed solar farm abuts a SSSI hay meadow, which is also home to a national monument – Bryn-y-Rhyd standing stone. The SSSI meadow is designated for botanical diversity and many ecological experts (including NRW officials) have expressed the view that this meadow is one of the most diverse hay-meadows in the country. It is also home to marsh fritillary and marbled white butterflies. It is inevitable that this meadow would be adversely affected by construction dust, pollution and, if approved, decommissioning pollution.

Welsh Government policy as set out in “Future Wales: National Plan 2040” states that renewable and low carbon energy projects (including repowering) qualifying as Developments of National Significance will be permitted subject to policy 17 and the following criteria:

- there are no unacceptable adverse visual impacts on nearby communities and individual dwellings;
- there are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species;
- there are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration. The cumulative impacts of existing and consented renewable energy schemes should also be considered.

As far as we can see Island Green Power’s proposals fail to meet each of these criteria.

The developers also claim that allowing sheep to graze within the solar farm is maintaining the agricultural use of the land, but that is hardly a justification for turning green fields into an expanse of glass. It is no more than another vacuous claim that cannot be verified at this point. Sheep are not seen grazing in the existing Clawdd Ddu Solar Farm. The existing tenant farmer at Brynrhyd does not keep sheep. The claims made by Island Green Power, are meaningless if no-one wants to put sheep to graze between the solar panels.

#### Impact on residents

There is already evidence that proximity to the existing solar farm has a negative impact on the value and saleability of property primarily on account of the noise produced by the solar farm. This scheme is far larger than the existing Clawdd Ddu Solar Farm and the soon to be built Tycroes Solar Farm and it will produce more noise and have a detrimental effect on more families in the area. For those living in nearby Garnswllt the glint and glare created by the development will not only be visually undesirable, but dangerous to the drivers of vehicles coming down Heol y Mynydd who will be looking straight at a sea of glinting and glaring glass.

#### Socio Economic impact

The developers claim that there would be 5 net additional jobs created with £0.5m gross added value to the Carmarthenshire economy per year over the 40-year operational lifetime of the development. Once again, there is very little in the way of evidence to support this claim. It is an aspiration, and if not met there will be no consequences for the developer and no visibility for the community to see what happens in reality. If approved, the economic benefit of this scheme to local communities will be minimal. What is clear from the proposals however is that the main beneficiaries of this scheme would be Island Green Power, a multinational developer of solar farms and the two primary landowners, namely Sir John Michael Dillwyn-Venables-Llewelyn of Llysdinam, Newbridge-On-Wye and David Richard Mount of Camberley, Surrey. On 29 May 2020 they granted an option for a lease to Brynrhyd Solar Farm Limited to access the land that they own at Brynrhyd. Venables-Llewelyn is also a director to the two major estates that own land locally – Penllergaer Investments Ltd and Parcmawr Investments Ltd and if this scheme is accepted, we would not be surprised if further applications were made at other locations in the vicinity. It is true that two local farmers – Brian Richards, the tenant farmer of Brynrhyd, and Gareth Jenkins of neighbouring Pentrehardd - have added some land that they both own, but the bulk of the land and therefore the financial benefit will go to Dillwyn-Venables-Llewelyn and Mount. Once again, land in Wales will be exploited in order to provide energy and as happened in the case of coal, the greater economic benefit will not be felt locally. Local residents and their elected representatives firmly oppose this development and object to the fact that it being imposed on the communities of Llanedi and Garnswllt by people who have no connection with area and care even less about its wellbeing and the wellbeing of its residents.

#### Impact on tourism and leisure

Another consideration should be the negative impact that this scheme will have on leisure activities and tourism in the area. People come to stay in Llanedi and the surrounding area to enjoy the peace and quiet of the countryside and walk the public footpaths and roads around the village. No one is going to want to go for a walk or cycle in the middle of several

hundred acres of solar panels and those offering accommodation and hospitality to visitors will be adversely affected. There are two existing footpaths that pass through this site, but any attraction that they have for walkers would be destroyed by thousands of solar panels.

#### Construction

Access to the proposed site is via two very narrow lanes. The disruption that will be caused by the high volume of HGVs that will need access will be considerable and the safety of those travelling along Heol Troeon Bach and Heol Ebeneser will be severely compromised. Considerable damage will certainly be caused to both roads, and it is likely that damage will also be caused to hedgerows, particularly along Heol Troeon Bach. The volume of construction traffic along with that of workers arriving at the site will also cause a dramatic increase in pollution in what is currently an unspoilt area. Exhaust fumes will rise to levels that have never been experienced in this locality and that too will have a negative effect on the environment.

Whilst wholly supportive of renewable energy generation, we believe that this scheme is far too big for the area, especially considering the existence of Clawdd Ddu Solar Farm and the proposed Tycroes Solar Farm. The benefits that it will provide in terms of renewable energy generation are far outweighed by the many negative effects it will have on the environment, the residents of Llanedi and Garnswllt and the leisure and tourism sector in the area and we urge you to reject the application and encourage the developers to look for more suitable sites.

Yours sincerely

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