

Julie James MS
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By Email: [REDACTED]

17/11/2023

Dear Julie,

RE: Parc Solar Caenewydd, Gowerton

We understand there has been significant social media coverage about this project and constituents have raised a number of concerns. These are important issues, and we feel that despite significant amounts of consultation, there continues to be a misunderstanding of our proposals. To address this, we have responded to the points raised individually below to relay the position on each of the matters.

Constituents' Concerns:

a) view the farm as an asset of community value, and do not believe that the benefits that Pegasus Group describes in the proposed application are of equal or greater value to the benefits already offered

The farm will remain in the hands of the existing tenants including the residence, with all existing farm buildings being unaffected by the proposed development. Furthermore, the existing farm shop will remain open in order to thrive and continue serving the local community.

As part of our collaboration with the farm tenant and the landlord, the tenant has been offered and has accepted alternative land to off-set any lost to the solar farm proposals. This alternative land is within 3 miles of the farmstead and adjacent to land that the tenant currently farms. Additional investment is being made by us, as developer, to support the farming transition - however, financial details are confidential between the parties involved. Furthermore, as part of our latest design iteration following our local consultations, we have scaled back the proposed amount of solar arrays, allowing a number of fields at Penyfodau Fawr Farm to remain in full agricultural use.

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It is worth noting that there is provision for extensive sheep grazing amongst the solar arrays (see below), allowing for continued agricultural production on the land in tandem with renewable energy generation.

We are currently consulting the community on our latest proposals and the details can be found at <https://www.parc solarcaenewydd.co.uk>

b) are concerned that they will lose valuable green space in the community

Whilst the proposals involve the development of agricultural land, none of the fields are public land or public open space. There is Registered Common Land located to the immediate north of the application site, which will not be impacted by this development.

The existing Public Rights of Way (PRoWs) crossing the application site will be retained and enhanced for public use. We are working closely with Swansea Council to improve public accessibility to the land and working with the landlord to create a new permissive path, so locals can enjoy the corridor along the Afon Llan. The farmland to the south of the Afon Llan has now been removed from the solar project and will continue to be farmed by the tenant farmer.

It is also relevant to note that the development will be temporary. An operational lifespan of 40 years is sought, after which the proposed development will be decommissioned, and the application site returned to full agricultural use.

c) worry that a large solar farm will be “an eyesore and a blight on our community”

The application site sits within the Aspect Area of ‘Afon Llan and surrounds’ which is described, by Natural Resources Wales in the Welsh Landscape baseline as:

“Valley floor with Afon Llan flowing through it, urban areas surround it some being immediately adjacent. Pylons cross the area as do a number of roads with the A484 forming part of the northern boundary. Visual detractors within include a sewage works, roads and pylons. Factories and urban areas border it in places. Some hedgerow field boundaries but has a distinct urban edge character. Change detection 2014: expansion of Swansea edge into this area.”

Our Landscape assessment considering public viewpoints determined that due to the limited visibility of the application site within the local landscape setting, it’s character would generally remain once the proposed development is in place. For the public rights of way

(PRoW), significant offset will be provided between the solar arrays and any public right of way, including the introduction of new trees and hedgerows.

We have taken care to design the scheme away from the viewpoints of residential properties and a landscape assessment has been carried out to evaluate this approach. The assessment confirmed that it is not possible to view the entirety of the site within a single field of view, which reduces any perceived scale of the proposed development in the wider landscape. This is due to the sloping landform of the Afon Llan valley, the surrounding built form, woodland and high sided hedgerows. The report concludes that there would be limited to no effects on the majority of viewpoints from residential properties.

It is relevant to emphasise that more than half of the proposed development (63%) will form green infrastructure across the site, these are ecological enhancements including: Grassland, Lowland Meadows, Rhos pasture and woodland extension.

d) believe that the quality of this agricultural land will deteriorate, if it is no longer farmed in the current manner

The Welsh Government has developed a web-based Predictive Agricultural Land Classification (ALC) map for Wales. The predictive ALC map shows that the quality of agricultural land within the application site mostly comprises land of Subgrade 3b and Grade 5, with small areas of non-agricultural land. The Welsh Government Soil Advisor has confirmed that a detailed ALC survey is not required, and the application site does not contain any best or most versatile agricultural land.

The proposed management of the land under solar PV panels will improve soil health, such as increasing soil organic matter, and hence soil organic carbon, increasing soil biodiversity, and improving soil structure. By increasing soil health, soil biodiversity and soil organic carbon, solar farms present an ideal setting for significant biodiversity net gain, by increasing the soil microbial, mycorrhizal and invertebrate populations.

e) argue that the mixed-use farm is valuable for the environment and for food production

As previously mentioned, the farm will remain and will continue to produce food, on land retained at Penyfordau Fawr and on the replacement land.

As for the land occupied by the solar panels it is very normal for agricultural farming to continue where there is renewable energy, and our plans will enable extensive sheep grazing amongst the solar panels.

Sheep grazing will involve similar amounts of labour to cattle grazing, and the economics (whilst variable, as is common with all agricultural enterprises) are not dissimilar. Therefore, there are no significant economic impacts.

Industry research has shown that sheep living amongst rows of solar panels spend more time grazing, benefit from more nutritious food, rest more and appear to experience less heat stress, compared with sheep in empty fields. Furthermore, sheep dung acts as a natural fertiliser that rejuvenates the soil and helps enhance biodiversity.

Whilst the farm shop sells some seasonal products produced on the farm, it also sells many products not produced on the farm. The conversion of beef grazing land to mostly sheep grazing land will not affect the potential for the farm shop to continue operating and still produce seasonal products on the replacement land and sell the same imported products.

f) are concerned that there will be a negative impact on biodiversity in the area

Our proposals include significant enhancements to local biodiversity. In total we are providing over 51 hectares (ha) of new high-quality green infrastructure, including 6.24ha of lowland meadows, 6.8ha of rhos pasture enhancement, 5.51ha of floodplain habitats, 3.56ha of targeted mitigation areas for certain species (such as reptiles), approximately 1.9ha of new trees, and approximately 3km of new hedgerows.

Our proposals will create a habitat corridor and restore the grassland areas to a priority habitat standard, with benefits to wildlife associated with these habitats, which will provide significant ecological benefits. The new and enhanced habitat corridors will be provided across the site for badgers, bats, birds, dormice and reptiles. Planting of native hedge and scrub species, and creation of wild bird cover plots will aim to extend the habitat mosaic and enhance habitat value for a range of species including bats and farmland bird species. Enhancement of rhos pasture and creation of butterfly banks will enhance habitat and connectivity for butterfly species.

The proposals have been informed by a number of ecological surveys that were undertaken between 2021 and 2023, which included badger; bat activity; further botanical assessment; breeding and wintering birds; great crested newt; invertebrate; reptile; potential bat roosting assessment and watercourse assessment. The survey information has informed ecological assessment and detailed habitat designs, complementing the landscape and surface water management strategies. In particular, the proposals include significant enhancements to the current limited diversity of the extensive grasslands once the land has recovered from the negative impact from cattle grazing.

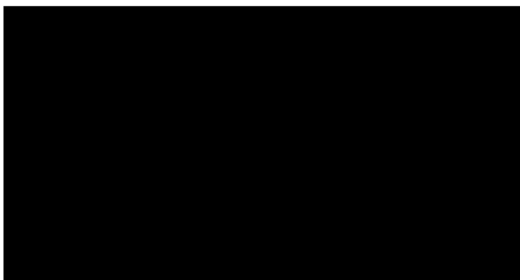
In compliance with Future Wales Policy 18, there are considered to be no significant adverse impacts on internationally or nationally statutory designated sites for nature conservation. It is considered that the development will not result in a likely significant adverse effect on the integrity of the Camarthen Bay and Estuaries Special Area of Conservation, and this has been confirmed by Natural Resources Wales (NRW).

We have undertaken a Biodiversity Net Gain Assessment using the Biodiversity Metric Calculations Tool (Defra, April 2023). In compliance with Welsh policy, the proposals will meet the requirements for onsite biodiversity net gain, with a predicted gain of at least 26.25%.

Please note that the ecological survey effort, findings and mitigation approach were agreed in consultation with the ecologists at Swansea Council and NRW.

We trust these clarifications are helpful to address and alleviate concerns raised about the proposed development. If you have any further questions, we would be happy to meet with you to discuss them in more detail.

Kind regards,



Managing Director