

# Appendix A - 2015/00026/FUL

M Goldsworthy  
Operational Manager Development and Building Control  
The Vale of Glamorgan Council  
Dock Office  
Barry Docks  
Barry  
CF63 4RT

D.E.E.R	
RECEIVED	
ACTION BY:	IR
NO:	5
ACK:	

RECEIVED  
17 FEB 2015

15 Feb 2015

Dear M Goldsworthy,

I am writing to you regarding this application at Court Farm Treoes. I am opposing this application due to these reasons, as follows:-

- Increase of flooding, as Treoes is officially registered as being in HIGH RISK C2 FLOOD ZONE.
- Higher House Insurance premiums, which will effect all villagers, due to flooding that will occur off the fields.
- The in appropriate use of high quality Agricultural Land.
- The enormity of excess volume of heavy haulage equipment, and construction materials being transported through aesthetic pleasing, extremely narrow beautiful single lanes, that encompass my village, where it is a walkers paradise.
- The 12 acres of breath taking natural beautiful landscape that will be ruined, by the this atrocity that will have a devastating affect on our countryside, and local wildlife.
- Also a very big concern is how safe would this solar farm be to the children/adults villagers of Treoes, and people from surrounding villages, who may venture out onto the fields, near to this solar farm.
- Also there has been some villages who have mentioned spotting Red Kites in and around the Treoes area, I for one have seen one. For me, this is amazing to think, that these Welsh native birds, which are now just coming out of extinction, and are living and feeding in and around our area. It would be a total shame if heavy duty machinery, plus a solar farm could frighten off these beautiful Birds of Prey, by the noise and lack of food source.

I have lived in this village most of my life, and have only just move back here due to ill health with my parents, who have lived in this village for years, and would like for the surrounding landscape to be conserved for my children, and their children to love, and appreciate like I always have.

Thanking you for attention, and please consider these views.

Yours Sincerely.



Mrs Emma Day.  
8 Glan y nant,  
Treoes.  
CF35 5EE

Bodafon  
Treoos  
Bridgend  
CF35 5DF

Sunday 14 February 2015

Mr. M Goldsworthy  
Operational Manager Development and Building Control  
The Vale of Glamorgan Council  
Dock Office  
Barry Docks  
BARRY CF63 4RT

Dear Sir

**REF: COURT FARM, TREOES  
INSTALLATION OF 2.2MW SOLAR FARM  
REF: 2015 /00026/FUL/IR**

I was unable today to attach my letter opposing this development via your online facility. It contains photos and may have proved too big to send.

As a result I am sending via registered post.

Yours faithfully

0

[Redacted signature area]

PAULA WILSON

Attach.

D.E.E.R
RECEIVED
ACTION BY: IR
NO: 10
ACK:

RECEIVED  
17 FEB 2015

13 February 2015

Dear Sir/Madam

I oppose the development of a solar farm on the outskirts of Treoes village for many reasons but have based my response on the following concerns – in no priority order:

1. Proposed Widening of Entry Gate
2. Public Right of Way (PROW) concerns
3. Totally Inappropriate use of Narrow Country Lanes for Construction Traffic
4. Categorisation of Land
5. Increased Risk of Flooding
6. General Visibility Impact Issues

### **1. PROPOSED WIDENING OF ENTRY GATE**

Information supplied states that the entry gate will NEED to be temporarily widened to allow for adequate turning circles for construction traffic. Other information states that vegetation will NEED to be cut back and maintained during construction period to ensure essential visibility for traffic entering and departing. Unfortunately no further information is provided as to HOW this will be done. Leading me to think, yet again, that neither the developers nor VOGC staff have bothered to visit and examine this critical proposed entry point.

Below are some photos taken in last 2/3 days.



General view of entry gate.

Please note 'ponding' after just 7/8 mins of very light rain!!



### **LHS VIEW:**

Immediately on the LHS of current gatepost is the PROW entry point which of course **MUST** remain in place in the absence of any plan to temporarily move/close during construction period. There are also remains of an old wall, ancient hedgerows joining and a watercourse which is critical for the draining off of surface water at all times during the year.



### **RHS VIEW:**

Immediately in **FRONT** of the RHS gate post is some vegetation embedded into a **BUND** – a vitally important bund, installed by VOGC in recent years, which seeks to help remove some of the surface water which cascades down from hills at Court Farm into Yr Efail. The bund being the third installation by VOGC to help reduce flooding in this C2 High Risk Flood Zone. Any suggestion this bund be moved or tampered with, even temporarily, should not be acceptable to anyone!!

I cannot understand then how this entry point can be widened without (a) moving the PROW on the LHS and/or (b) disturbing the essential flood defence bund on RHS. **Typically developers have not said HOW they plan to do this!**

## **2. PUBLIC RIGHT OF WAY CONCERNS**

**Comments made in the Design and Access Statement about the PROW must be challenged.** The DAS simply states *'It has been decided to not try to incorporate the PROW within the development site, or seek to divert it, meaning that it lies outside the area of the proposed solar*

*farm.*

Whilst this is may be true after the project ... the planning application fails to take account of or consider the impact to PROW users during the development period. It is my opinion that developers/ROW Team have simply undertaken a desk top study (as they have done with other aspects of this planning application), have failed to consider impact to PROW users during the construction period. I believe they have failed to visit the site and fully considered the MAJOR health and safety implications to walkers.

There is a ROW on the LHS of the entry gate. This same entry point will be shared by all traffic into the development site. The existing ROW route will mean that walkers will have to walk alongside the same track panels provided for construction traffic. The ROW will take walkers through a second gate, again used by all construction traffic, into a very hazardous area during project development. Entering this second gate walkers will find themselves with fences and panels being erected on their immediate left side and will have the designated construction compound on their immediate right side. In effect walkers at this second point using the PROW will be walking through a very dangerous area, an area which I believe will be larger and has not been drawn to scale on maps. This construction area is described as being where all large vehicles will enter, unload, turn and depart. This area will also be a car park for potentially 50 workers arriving and departing each day, 6 days per week. Also a visitors car park and an area for the siting of several portacabins.

Suggestions how to manage PROW users are scant and conflicting ... and in my view insufficient. The transport plan merely suggests that should any member of the public wish to enter the site they will be marshalled at entry gate by banksmen. Part of another report states banksmen will 'assist' walkers in the construction compound, elsewhere in other documents it states that should anyone walk in the area 'all work to stop'.

*There is no evidence to show in any document that the ROW Team have actually visited the site, held any meetings post pre-planning stage and given any consideration at all to a very potential dangerous situation for walkers navigating the site during the construction period. Had any site meeting taken place I would have expected the ROW Team to have recommended that in recognising the short term hazards during the construction period and to reduce obvious health and safety the ROW would be temporarily stopped or moved to another location. Thereby undertaking public consultant and placing advertisements in local newspapers as required.*

Good practice guidelines to LA's. recommended by DEFRA. remind councils that it should be understood by all 'that the route of any ROW has legal protection and the impact of a proposal on a ROW is a MATERIAL consideration when a planning application is being decided'

### **PROW - LANDSCAPE AND VISUAL ASSESSMENT (LVIA)**

I can find no evidence. as per guidelines to LA's. of any LVIA which must take account of ROW considerations and is recommended even if an EIA is not required.. Guidelines state that any LVIA must assess *visual effects* and *visual amenity*, both in terms of impact and magnitude and consider rights of way and recreational trails as part of this assessment. *'Zones of Theoretical Visibility'* are important in assessing the impact on access users. Maps showing types of view and places where ROW users will be affected should be shown. Additional considerations, involving the ROW team, to be included in the LVIA are the impact of removed hedgerows, the time to grow back, the impact of high fencing alongside a POW. 'Consideration of important views needs to be taken into account as fencing may reduce enjoyment'. Visual intrusion, by glint or glare along the route of the ROW must also be considered for POW users.

### PROW - LANDSCAPE MANAGEMENT PLAN (LMP)

I can find no evidence of any LMP also recommended. Normally to be approved as part of a planning application for any wind or solar energy project. This should cover the lifetime of the development operation (usually 25 years) plus restoration and a 5 year after care programme to ensure effective restoration of vegetation. It is IMPORTANTLY recommended that the LMP includes **any statutory obligations for rights of way on the site, during the life of the project and during decommissioning.**

### 3. TOTALLY NAPPROPRIATE USE OF NARROW COUNTRY LANES FOR CONSTRUCTION TRAFFIC

I believe **the Transport Plan seeks to deliberately mislead councillors.** The proposed route is described as being roads A and roads B, both unnamed, they are described as being 3-4m wide with verges. It is also suggested that Road A is a two way carriageway. Suggestion being then these roads are totally suitable, lots of space, to allow max 2.55m vehicles travel 150+ times to project entry point. THIS IS NOT THE CASE!

For clarity: Road A is **Pantruthin Fach Lane**, Road B is **Ty Candy Lane**  
So whilst they are technically roads both these routes are in fact (country) LANES. Both lanes are single track, tarmacked with very few existing passing places. They are bordered by hedges, soft verges, watercourses in most places.

#### **Dictionary definition of a lane**

.... a narrow road in a rural area ...a narrow country road .....a narrow way or passage between walls, hedges, or fences. This is a very accurate description of roads A and B.

The lanes have been described as 3-4m wide in the TP. THEY ARE NOT !!  
There is one part which is barely 2m (with verges either side), other areas are 2.3 with verges, one part is 2.6 with strong hedge and BT pole, many other areas are approx 2.8. There are few areas 4m wide.

The TP fails to mention that the grass verges are in most places very narrow, very soft, sloping and very vulnerable. The TP fails to mention that on both side of much of these two lanes there are essential water courses which allow for surface water from lanes and fields both sides to drain away.

Had the developers or VOGC Highways at pre-planning staged looked at 'my Vale' or actually visited and looked at the proposed route they would have very quickly become aware of the vulnerable watercourses, the culvert on Road B and the two very acute 90 degree turning points on the route proposed – all of which are of major concern to villagers.

Just because these narrow lanes exist, just because they 'technically' do not have any speed restriction or any weight limit attached to them, **does NOT mean they should be subjected to the proposed number of journeys and tonnage to complete the solar project.** Just because a person from Highways has driven the roads/lanes in a car, or a dustbin lorry is able to travel the lanes once a fortnight, or the lanes are used by local and agricultural traffic occasionally **does NOT mean they are suitable to use as access roads for this project.** These lanes are used in the main by many people on daily basis for walking, jogging, bicycling, families with prams and children, horse traffic too.

At the public meeting on 9<sup>th</sup> October 100% of Treoes villagers attending made it very clear they opposed the project. One of their most important concerns was the proposed route. Developers were forced to publically admit they had not even walked the proposed route themselves, just done a google search! They did agree however to go away and consider other options. They promised to arrange a vehicle test using a 12m flatbed lorry along the proposed route before submitting final application and agreed to involve specific (named) local people when the test would be. To date **NO HIGHWAYS TEST HAS TAKEN PLACE** using a 12m vehicle, no local person has been contacted. I personally telephoned Highways Dept. on 2 Feb and learned that despite promises made by developers no meetings have even taken place between developers/ Highways since pre-planning stage April 2014. The only 'test' has been someone driving down the roads/lanes in their car!! No promises have been kept by developers!

It is **NOT ACCEPTABLE** when considering all the above for the developers to simply suggest that prior to and after using these narrow lanes **they will make good any damage!!!!** These lanes should not be used, they are narrow, vulnerable, have watercourses which are an essential part of flood defence systems in this already **HIGH RISK C2 FLOOD ZONE**.

#### **4. CATEGORISATION OF LAND**

I accept the need to consider green policies but I simply **cannot** accept any type of solar development which removes good quality land from agricultural use for 25 years. Court Farm being grade 2 overall and 3a for the proposed project. This land is capable of sustaining crops and sheep grazing and I believe under national government and local guidelines "**enjoys protection from development**". **I want VOGC Councillors to say NO to utilising such good land.**

It is quite laughable that in pre-planning reports the developers described land at Court Farm as being of low quality but later at full application stage finally admit it is 3a, good quality. **However they explain they have been forced to consider this quality land as there is little lower quality land in the area!!!**

Treoes villagers are well aware that already in recent weeks solar developers have approached other farmers in the immediate area. I suggest developers seeking land for solar farms - remembering these companies can only exist because of the significant subsidies paid to them by UK government - go and find appropriate land of appropriate (lower) quality elsewhere. Land suitable for such developments where perhaps a farmer really does need to consider diversifying to sustain a living. Leaving good quality land at Court Farm for important agricultural use.

It is the opinion of some people in the village that the farm, which was previously a local authority farm, privately purchased some years ago has some form of caveat or protection agreed that it should remain for agriculture use only for 30/40 years? Whilst it could be called 'diversifying' the development of a solar farm is not 'agriculture'

Other people advise that the VOGC will be a beneficiary should the project proceed having sold the farm to the current owners. That the VOGC will be receiving a kick back? If this is correct I do hope all facts will be fully disclosed to councillors and the public who will be attending the planning meeting.

#### **5. INCREASED RISK OF FLOODING**

I am constantly at risk of flooding living at 'Bodafon'. Through no fault of my own I have been refused insurance in last 3-4 years. I have lived here since 1986 and despite a largescale flood defence system to control the river, the recent installation of holes in a wall opposite the house and

the most recent development of the bund by entry gate to Court Farm which helps draw water away from Yr Efail I have stood several times and watched water creep up to my front door, so distressed having to decide what important personal items to save from the groundfloor to take upstairs. Water has yet to enter my house but my garage has flooded several times.

Many times I have had water over my wellington boots helping others to clear debris from the main drains at Yr Efail and Brookside. I regularly help others to clear debris from the drainage holes in the wall opposite Bodafon hoping that flood water will be able to escape into the river. However often tide timetables go against us and the area floods. In our case at Bodafon to the point of lapping our doorstep and entering our garage.

What MUST be understood is that water and debris cascading down the hills from Court Farm, through the gate into Yr Efail, carrying with it agricultural debris and soil is a MAJOR contributor to flooding and blocking major drains in our immediate area.

DEFRA guidance to developers and planners reminds everyone that water coming off solar panels **could concentrate in specific channels and thereby accelerate the incidence of run-off.** I believe the siting of this project **WILL INCREASE FLOOD RISK.**

The proposed solar development is sited on the same hills that has water and debris cascading down into Yr Efail. General opinion suggests a 5% minimum LOSS of soil/vegetation is likely to occur as a result of cement bases needed for inverter/substation etc and for up to 20,000 metal structures to be placed into the ground to support 8976 solar panels. Add to this the impact of hedge removal to allow for new fencing and you have A SERIOUS INCREASED FLOOD RISK.

Which is why DEFRA suggests draining systems, including new bunding or water holding swales should be considered in any planning application, so that run off does not increase erosion or increase general flood areas. It fails to consider extra bunding or drainage to limit damage.

The Flood Risk Assessment in the planning application makes no mention of potential soil erosion or accelerated incidence of run-off given the project is on hills sloping towards the village. It merely comments on the flood risks connected with the project site itself.

**Given concerns above I ask councillors to request a fuller more appropriate flood risk assessment from developers which highlights how they will seek to overcome increased risk of flooding to immediate housing in the area. Are developers or VOGC prepared to pay compensation to householders during the 25 year period of this project????**

## **6. GENERAL VISIBILITY IMPACT ISSUES**

Treoes has already seen major changes in last 12/18 months. The village has historically been impacted on by the development of the Waterton Industrial Estate on its edges. Villagers have seen the recent erection of a turbine on the horizon at Ford, can see the huge turbine now on St Mary Hill and travelling around local villages cannot help to see the appalling 2 bladed turbine at double speed blotting and ruining the landscape. Should this solar project go ahead views will be significantly impacted for many people, they will see the solar farm on the ground with high turbine St Mary Hill a short distance beyond.

I sincerely believe ENOUGH IS ENOUGH. Green policies are already impacting detrimentally on views in the immediate area of Treoes.