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Date: 20th September 2018

Ms K Maskell
The Planning Inspectorate
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Dear Kelly

Town and Country Planning Act 1990
The Developments of National Significance (Wales) Regulations 2016
Application by: Elgin Energy EsCo Ltd
Site Address: Wauntysswg Farm, Abertysswg, Rhymney, Tredegar, NP22 5BQ

Regarding the above, the consultation period ended 6th September 2018 and the applicant has now had the opportunity to review the consultation responses received and obtain feedback from the consultant team.

The Local Impact Reports ('LIR') received from Blaenau Gwent County Borough ('BGBC') and Caerphilly ('CCBC') Councils raise detailed comments in respect of landscape and heritage issues that were not made known at the earlier 6-week pre-application consultation stage prior to the submission of the Development of National Significance ('DNS') application. The Pre-Application Consultation ('PAC') Report (reference: WAUN-005) submitted with the application confirms this at section 5.

As the first opportunity to do so, the applicant would like to consider and address these detailed comments on the submitted Landscape and Visual Assessment ('LVA') (reference: WAUN-008) and Baseline Heritage Impact Assessment ('BHIA') (reference: WAUN-009) through preparing updated reports to address the following, but not limited to, comments:

Regarding the submitted LVA, CCCBC's LIR states:

- *'the LVIA omits to assess the VILL NH2.1 Northern Rhymney Valley non statutory designation, which is afforded protection within the CCB LDP due to the overall combined LANDMAP evaluation being either outstanding, high or moderate for the five LANDMAP aspect areas';*
- *'There is no assessment of the visual impact on the highway surrounding the site notably the B4256 adjoining the northern and western boundary or the A469 to the south'; and*
- *'Viewpoint 10 requires additional assessment and baseline and montage photographs producing from the adjacent PRow FP270 Gelligaer'.*

Regarding the BHIA, comments include:

- Absence of consideration of the access;
- Consideration of views to the Scheduled Ancient Monument ('SAM');
- Potential for amendment to layout and landscaping/planting to reduce impact on 'SAM'.

Updated assessments would enable the applicant to consider potential amendments to the scheme in respect of (but not limited to):

- Layout and positioning of solar photovoltaic panels;
- Antennae; and



- Landscaping.

We trust the above request is reasonable and it is disappointing the comments within the LIRs were not forthcoming at the earlier pre-application consultation stage from BGCBC and CCBC when a draft of the application was made available to them for comment. The applicant feels at a significant disadvantage as a result and had we known the concerns now raised within the LIRs earlier they could have been addressed prior to submission to the Welsh Government and potential amendments and delays avoided. However, it is impossible for the applicant to confirm amendments at this stage as the additional assessment needed is yet to be undertaken and considered.

We therefore request that the applicant be given the opportunity to undertake these updates to the LVA and BHIA prior to the consideration of the application by the Inspector.

Yours sincerely
For RPS



Dafydd Williams
Associate

cc:
Mr D Meehan (Elgin Energy EsCo Ltd)