

GR/BRS.4254

30 December 2020

Harry Edgeworth
Casework 2 Team Leader
The Planning Inspectorate
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Dear Sirs

DNS/3213164

Article 27(7) of the DNS Procedure Order – Submission of Variation to the Application

Site: Land at Blaenhiraeth Farm, Llangennech, Llanelli, SA14 8PX

I refer to the above application and your correspondence dated 3 December 2020 and I am now in position to vary the application as follows.

The layout of the development proposal has been modified to specifically incorporate the suggestions set out in the Local Impact Report (LIR). The variations have also been informed by other consultee comments and third-party representations.

General Modifications (relevant to all sites A, B and C)

All CCTV will be mounted on wooden poles and their overall height is reduced from 4m to 3m. This variation takes account of third party representations. Localized modification to the development to ensure that a 7m buffer is provided between the development and all watercourses on site. This modification largely relates to Site A. This variation responds to the National Resource Wales consultee response.

Site A Modifications (northern site)

The modification presents an alternative solution for laying part of the cable run between Site A and the proposed substation and this specifically relates to the crossing of the River Morlais. The preferred method for laying of cables is by burying them in an open-cut trench along the road and across the listed bridge. The alternative option to crossing the listed bridge is non-open cut (trenchless) crossing under the riverbed. At the pre-commencement stage it is intended to carry out a conditional survey of the Bridge structure including all masonry and parapets and then drill a series of 16mm pilot holes to confirm the depth of the road makeup at the crown to verify that a depth of 350mm from crown is achievable for the open cut trenching. If the necessary depth for the open-cut trenching cannot be undertaken, then the alternative trenchless crossing would be implemented. Non-open crossing has the advantage of minimising impacts to surface areas and reducing the levels of reinstatement requirement. It is a well-established and appropriate technique for crossing difficult terrains and sensitive features. Method of works for the non-open cut crossing is discussed in the updated draft Construction

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Environmental Management Plan (Appendix 0.1). This modification responds to Cadw consultee response.

Site B Modifications (central site)

Solar modules and associated infrastructure (inverters, fencing and CCTV) have been removed from two areas adjacent to the A476 (This variation responds to the LIR). Technological advances with the solar industry have allowed the applicant to modify the submitted design by switching to a PV module with a higher wattage output. This, in turn, has allowed the applicant to reduce the overall footprint of the solar modules whilst still delivering the same amount of renewable energy as proposed by the submission design. The proposed stock fencing and CCTV system has been drawn back to reflect and follow the reduced development footprint of the arrays. An additional parcel of arrays has also been removed from the south easterly corner of Site B. The areas vacated by the arrays are safeguarded for ecological mitigation and enhancement measures to be undertaken as part of the development. The proposed temporary construction compound will be relocated to a position closer to the arrays. This variation responds to discussion held between applicant and Cadent.

Site C Modifications (southern site)

The temporary construction compound is relocated to an area to the immediate south west of the substation. This variation responds to the LIR.

In addition to the ES addendum, the variation is supported by an updated Construction Traffic Management Plan which introduces an alternative option of using tractor and trailer for distributing plant and materials from the main construction compound at Site B to Site A via the B4306 and U2309. Should 10 metre rigid lorries be used, it is estimated that this could equate to a total of 345 deliveries, or 1 to 2 vehicles per day on average (up to 4 two-way movements). If tractors and trailers are used, then it is estimated that this could equate to 425 deliveries, or 2 to 3 vehicles per day on average (up to 6 two-way movements). The exact details will be provided when a contractor is appointed and, if necessary, this can be covered by an appropriately worded condition. This variation takes account of third party representations.

The variation is presented in the following documentation:-

Revised Drawings: -

- i. **Site Layout Plan (Drawing No. DV_LV_101_02_03)¹**
- ii. **CCTV Detail (Drawing No. DV_GEN_101_02_CCTV Detail)²**

Amended Documentation:-

- iii. **First Addendum Environmental Statement Main Statement**
 - a. The ES Addendum seeks to clarify where the design and layout changes have a material impact on the January 2020 assessments and presents revised assessments where necessary with regards to landscape and visual (ES Chapter 6), ecology (ES Chapter 7) and Flood Consequence Assessment (appendix to ES chapter 8).

¹ Supersedes Drawing No. DV_LV_101_02.00 submitted in January 2020

² Supersedes Drawing No. PEN01_DV_SEC_410_00 submitted in January 2020

- iv. **First Addendum Environmental Statement Technical Appendices**, which includes the following updated or new documents: -
 - a. Appendix 0.1 (new appendix) - **Construction Environmental Management Plan**
 - b. Appendix 6.4 - **Residential Visual Amenity Assessment (Rev A)**
 - c. Appendix 7.5 - **Construction Ecological Management Plan**
 - d. Appendix 7.6 - **Landscape Ecological Management Plan**
 - e. Appendix 7.7 (new appendix] - **HRA Information**
 - f. Appendix 8.1 - **Flood Consequence Assessment**
- v. **First Addendum ES NTS (English)**
- vi. **First Addendum ES NTS (Welsh)**
- vii. **Updated Construction Traffic Management Plan**
- viii. **Highways Position Statement** [new document]
- ix. **Updated Heritage Impact Statement**

The documentation above will be provided electronically to the Inspectorate and paper copies can be provided upon request.

Yours sincerely



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Director

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enc

cc