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Ceredigion County Council
Planning Department
Penmorfa
Aberaeron
SA46 0PA

31st October 2023

Dear Sir/Madam

INSTALLATION OF GROUND MOUNTED SOLAR ARRAYS, QINETIQ, MOD ABERPORTH, PENNAR ROAD, PARCLLYN, CARDIGAN, SA43 2BU

Please find enclosed a full planning application for the development of ground mounted solar panels, storage batteries and associated works on MoD land at Aberporth, Ceredigion.

This application is made on behalf of our client, QinetiQ, who are acting as the agents for David Burns of the Defence Infrastructure Organisation (“the applicant”). Tetra Tech Planning is providing the planning consultancy and supporting technical advice to support the scheme.

The area proposed to accommodate the solar panels is shown edged red on the location plan, submitted along with this letter. The working description of development is as follows:

“Installation of ground mounted solar panels and associated works.”

This covering letter/statement sets out the planning justification for the proposal in accordance with national and adopted Local Plan Policies. The planning application submission includes the following supporting technical documents:

- Red-lined boundary location plan 1:5,000;
- Site Location Plan 1:2,500;
- MoD Aberporth PV Layout Plan;
- Archaeology and Heritage Desk Based Assessment;
- Geo-environmental Phase 1 Assessment;
- Preliminary Ecological Appraisal;
- Habitat Regulations Stage 1 Assessment;
- Habitat Regulations Stage 2 Assessment;
- Flood Consequences Assessment;
- Landscape and Visual Impact Assessment;
- Topographical Survey;
- Unexploded Ordnance (UXO) Detailed Risk Assessment (DRA);

- Glint and Glare Assessment.

Background

QinetiQ are a multi-national defence technology company specialising in power sources, energy distribution, information technology, cyber defence, security and strategic consultancy. They provide advice and support to the UK Government's Critical National Infrastructure and defence.

QinetiQ secured an amendment to their Long-Term Partnering Agreement ('LTPA') to modernise the MoD operations. Part of these modernisations include the delivery of the Net Zero Solar Planning and Design project, which will support the LTPA by bringing resilience and reducing carbon emissions to the critical defence facilities and estates which they operate. This project seeks to ultimately support the UK Government's commitment to net zero carbon emissions by 2050.

The development boundaries of the planning application area are illustrated within the redline boundary shown on Figure 1 below.



Figure 1 – Development boundary red line plan

Site and Surrounding Area

The solar arrays are proposed to be located across a single parcel of land within the QinetiQ MoD Aberporth compound, the site measures approximately 1.82 hectares in size. The site is located within the MoD compound at the southwestern boundary. The MoD compound is a secured facility, those with authorisation access the site at the south along Hillfield Road.

The area proposed to locate the solar arrays is identified on the submitted plans and in figure 1 above. The site is currently comprised of an area of hardstanding to at the southern portion with the portion to the north being vacant grassland. The area of hardstanding has previously housed a workshop, which has since been demolished. There are no built structures, and no mature vegetation present on the site.

The MoD compound contains a mixture of buildings used for office, research and administrative functions, warehouses and storage units, areas of hardstanding and vacant grassland. The compound is used as a testing, evaluation and training facility for weapons and defence systems and has been in this use since the 1940's.

The wider context is characterised by the sea to the north, east and northwest, the town of Aberporth to the southeast and the village of Parcllyn to the south. Agricultural fields are situated to the southwest and west. The nearest residential receptor is located approximately 200m to the south of the southernmost parcel, and this comprises a row of terraced houses along Hillfield Road.

There are no listed buildings, scheduled monuments or registered historic parks and gardens within the site boundaries or within the MoD Aberporth boundary itself. The nearest heritage features include the two Grade II Listed Building (Ty Mawr and Dolewen) located approximately 800m to the southeast, and the presence of a Scheduled Ancient Monument (Aberporth Range Simulated Ship Firing Platforms) approximately 900m to the east. The Special Protection Area (West Wales Marine) is present to the north, east and west of the compound.

The site is not located within or in vicinity to an Area of Outstanding Natural Beauty (AONB). The site is also not located within or in vicinity to a National Park. There are no other landscape or visual designations within the site or its surroundings. The MoD complex is within the vicinity of the Wales Coast Path which follows the coastline of Wales. The path runs along the cliffs and the coastline and momentarily diverts inland to avoid and skirt the southern side of MOD Aberporth.

Planning History

A search of the Council's online planning database has not returned any planning history on the development site. An extended search, however, has found a number of previous applications with regard to the wider site. The relevant full planning applications since 2000 are listed below;

- **A031248GD** - Demolition of various buildings. No objections, 18/02/2004;
- **A120710** - Erection of replacement 20.5 metre high hybrid communications tower on new 6 metre square concrete base and removal of old timber tower (no increase in height). Approved 04/12/2012;
- **A130180** - Erection of new office and range control building & associated works. Approved 09/05/2013;
- **A130791** - Erection of a building. Approved 04/12/2013; and
- **A220773** - Installation of new 1no. 17.5m radar mast, 2no. radar antenna and finials (total height 26m) together with associated ground-based equipment cabin and fencing. Approved 09/01/2023.

The Proposed Development

The working description of the proposed development is as follows;

“Installation of ground mounted solar panels and associated works.”

The maximum potential energy generation capacity of the proposals has been calculated as being 816kW, which is around 42% of the energy needs of the QinetiQ compound. The panels are proposed to be south facing and angled at 20 degrees. Figure 2 below displays the side elevation of typical solar panel installation.

QinetiQ anticipate using the Q Peak Duo XL-G11 Series panels. The scheme would be in compliance with the Microgeneration Installation Standard (MIS) 3002 V. 4.0. This means that:

- Orientation of panels will give maximum useable output throughout the day;
- The scheme will comply with all planning requirements;
- Consideration will be given to any shadowing when spacing the panels;
- Consideration will be given to the ground and environmental conditions;
- It will comply with the recommendations to protect local wildlife;
- It will minimise residual risk for maintenance and cleaning;
- There will be recognition of the above average wind speeds experienced; and
- Positioning of inverters with due consideration made for access and maintenance.

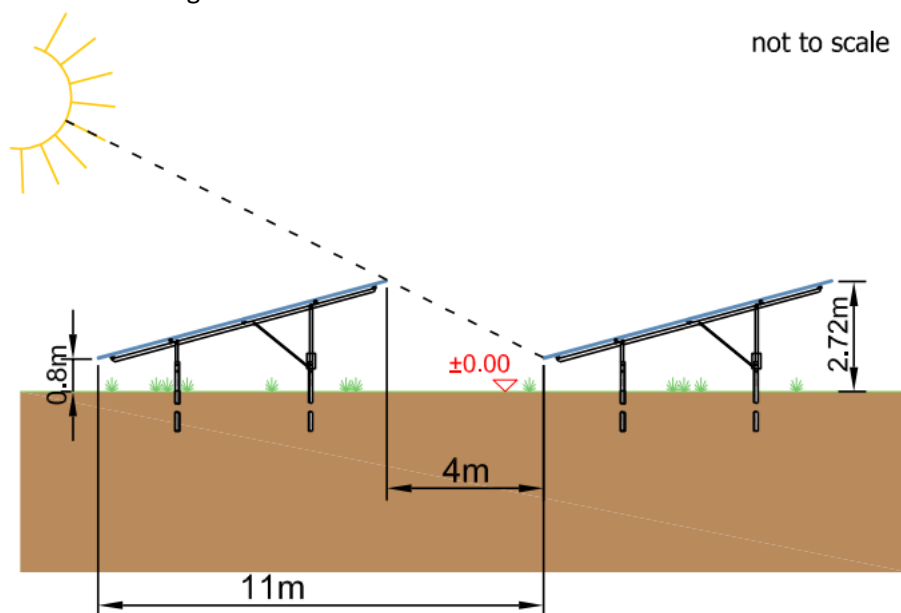


Figure 2 – Side elevation of typical solar panel installation

EIA Screening

Tetra Tech submitted a request for an EIA screening opinion to the Council on 12th May 2023 (reference **Q230097**).

In our EIA screening opinion we stated that the proposal does not fall within the categories of development defined within Schedule 1, for which an EIA is mandatory. The proposal broadly falls within the definitions outlined within Schedule 2 of the EIA Regulations as ‘Energy Industry’;

specifically, under section 3(a), ‘*industrial installation for the production of electricity, steam and hot water*’. The thresholds for 3(a) are where the area of the development exceeds 0.5 hectares.

As the development exceeds the threshold of more than 0.5 hectare identified within Schedule 3(a), it was necessary to consider whether the proposal would have significant environmental effects, with particular regard to whether the site is located within a ‘sensitive area’ or would affect the features of such sensitive area. Regulation 2 of the EIA Regulations defines ‘sensitive area’ as:

- Sites of Special Scientific Interest (SSSI);
- National Parks and The Broads;
- World Heritage Sites;
- Scheduled Ancient Monuments;
- Areas of Outstanding Natural Beauty (AONB); and,
- European Sites.

A response to our EIA screening request was received from Ceredigion County Council on the 11th August 2023. It concluded that an Environmental Impact Assessment would not be required for this type of development on this specific site.

Planning Policy

A review of the relevant national and local plan policies is summarised below.

1. National Planning Policies

Planning Policy Wales

National policy is set through Planning Policy Wales (PPW) the 11th edition of which was published in February 2021. It contains guidance for decision makers as well as setting out the Government’s planning policies for Wales and how these are expected to be applied.

Section 5.7 of the document relates to energy, with paragraph 5.7.1 explicitly stating that low carbon electricity must become the main source of electricity in Wales, with the future energy mix being dependent on a range of established and emerging technologies.

Paragraph 5.7.14 sets out renewable energy generation targets for Wales, which includes 70% of all electricity consumption to be generated by renewable sources by 2030.

Paragraph 5.7.15 states that the planning system has an active role to help ensure the delivery of these targets, in terms of new renewable energy generating capacity and the promotion of energy efficiency in buildings.

Future Wales: The National Plan

Adopted in February 2021, the National Plan document sets out a national framework for development up to 2040. It sets out a strategy to address key national priorities through the planning system. This includes achieving decarbonisation and climate resilience.

Along with Planning Policy Wales, the document seeks to ensure the planning system focuses on,

“Delivering a decarbonised and resilient Wales through the places we create, the energy we generate, the natural resources and materials we use and how we live and travel.”

The document emphasises the ambition for Wales to become a world leader in renewable energy technology and notes the potential for solar energy. It also commits to ensuring the planning system provides a strong lead for renewable energy development, support the renewable sector and reduce carbon emissions.

Policy 9 – Resilient Ecological Networks and Green Infrastructure seeks to ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure.

Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure is of significance as it strongly supports the principle of renewable and low carbon developments from all technologies and scales to meet future energy needs. The Policy states that, in the determination of planning applications, decision-makers must give significant weight to meet the Welsh Government’s international commitment to generating 70% of electricity by renewable means by 2030 to combat the climate emergency. This policy also encourages proposals to describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities.

The plan also sets out a regional approach for Mid-Wales / Southwest Wales, which states that decarbonisation and responding to the threat of the climate emergency should be central to regional planning.

Prosperity for All: A low Carbon Wales

The document sets out the foundations for Wales to transition into a low carbon nation. With regards to power, it states that low carbon electricity needs to become the main source of energy.

2. Local Planning Policies

The development plan for the area comprises the Ceredigion Local Development Plan (2007 – 2022). The Council is currently in the process of producing a new Local Plan, however this has not yet been adopted and therefore does not form a material consideration in determining this planning application. The relevant local policies are detailed below:

S01: Sustainable Growth

The local plan commits to growing stronger and more sustainable communities through providing opportunity for increasing employment opportunities across the county whilst ensuring the County’s environment and resources are protected and enhanced.

S04: Development in ‘Linked Settlements and Other Locations’

This policy clarifies that developments in ‘Linked Settlements and Other Locations’ (locations that are not urban or rural Service Centres) will only be permitted if they do not result in the loss of services and facilities unless there is adequate provision in an adjacent settlement or Service Centre.

LU25: Renewable Energy Generation

This policy clarifies that renewable energy projects will be permitted where resource delivery has been assessed as an effective and viable option and any adverse impacts of the particular technology can be demonstrably mitigated.

DM06: High Quality Design and Placemaking

This policy explains that in order for developments to be considered high quality in design and contribute to placemaking, they will have to demonstrate the physical, social, economic and environmental context of the site and its surroundings have been accounted for when producing design proposals.

DM10: Design and Landscaping

This policy recognises the importance of good landscaping in development designs. Therefore, developments will be expected to demonstrate how the proposals will respect the natural environment contours of the landscape and to accommodate the protection of local and strategic views. Developments should also respect and where possible retain, any existing natural features on the site.

DM14: Nature Conservation and Ecological Connectivity

This policy clarifies the LDP's approach to ecological issues and nature conservation, it states:

“Development will be permitted where it protects and, where possible, enhances biodiversity, geodiversity and ecological connectivity across Ceredigion, including local sites and local priority species and habitats. Where it is appropriate to the scale and location of the development and opportunities exist, development should incorporate nature conservation education and access, providing the site's ecological or geological integrity can be safeguarded.”

DM15: Local Biodiversity Conservation

This policy sets out requirements for biodiversity conservation. Applicants will be required to demonstrate that developments will not have an adverse effect on on-site and off-site biodiversity and ecological connectivity. The policy further states that where necessary, management plans will be produced and agreed with the LPA and developers to take into account mitigation and compensation measures.

DM19: Historic and Cultural Landscape

This policy emphasises the need to protect the historical and cultural landscape of Ceredigion. Developments will be permitted where the County's distinctive appearance, architectural integrity or settings will not be significantly affected.

DM22: General Environmental Protection and Enhancement

This policy requires developments to help achieve environmental protection and enhancement. Proposed developments will therefore be permitted providing they protect and enhance where possible air, soil and the water environment both on and off site and do not have a significant adverse effect on noise and light levels.

DM23: Coastal Management

This policy requires developments that are located along the coast to have considered all environmental effects to demonstrate they would not contribute to or transfer the risk of flooding.

3. Supplementary Planning Guidance

Ceredigion's Local Development Plan also encompasses a number of Supplementary Planning Guidance documents (SPG's). Of relevance to this planning application is the Renewable Energy SPG, adopted by the Council on 28th January 2015. The SPG provides applicants with details of submission requirements for applications relating to solar panel developments. Due to the approximate power generation of the development, this application would be categorised as 'Sub-Local Authority'.

Further to this the SPG requires developments of this type to consider the impacts on the local landscape character, specifically scale and topography of and the relationship with the landscape and settlement pattern. Applicants will also have to provide detailed technical documentation to support the application.

Planning Appraisal

The Principle of Development

Policy S01 Sustainable Growth in the Ceredigion Local Development Plan states that the Council supports the improvements to the sustainability of the county and consideration to the appropriate scale of growth. Policy LU25 also states that renewable energy technology will be encouraged, provided it can be demonstrated there would be no adverse impacts on the locality as a result of the development. Adequate mitigation measures must be demonstrated if there are any adverse impacts. Additionally, Welsh national policy also offers support in principle to renewable energy. Future Wales Policies 17 supports the use of renewable and low carbon developments from all technologies and scales to meet future energy needs. PPW 11 also indicates the importance of low carbon electricity becoming the main source of electricity in Wales, with the future energy mix being dependent on a range of established and emerging technologies.

MoD Aberporth is located on the north coast of Ceredigion in a relatively rural area. To the north lies Cribach Bay, to the west and southwest are agricultural fields. To the east lies the village of Aberporth and to the south, the smaller settlement of Parcllyn. The parcel on which the solar panels would be located is to the southwest of the site with the nearest residential properties approximately 200m to the south and southeast across Hillfield Road within Parcllyn. It is therefore considered the development site is located within a reasonable distance away from the nearest residential properties. Any potential effects on residential properties have been clarified in the subsequent sections below.

The proposed development would meet the essential need for this rural location; the location is necessary for the provision of public utilities (i.e. Government owned strategic military operations) and infrastructure; it would help sustain the existing MoD operations and would comprise an appropriate extension of the existing MoD facility.

In this regard, the proposed development would meet the specific needs of the MoD at this location to ensure that the existing MoD Aberporth facility is sustainable in the long-term and contributes towards meeting the Government's aims of net zero emissions by 2050. This would be achieved whilst making efficient use of currently underutilised, mostly hardstanding land and having a negligible effect on the nearby residents and the surrounding environment.

The site within the MoD compound has been carefully selected to be as far removed as reasonably possible from the village of Aberporth to the east and Parcylln to the south. The development is therefore considered to satisfy the requirements of local policies S01 and LU25 and national Welsh policies, Future Wales Policy 17 and Planning Policy Wales 11.

Flood Risk and Drainage

The Local Development Plan has limited policy related to flood risk, it does however contain a policy relating to Sustainable Drainage Systems – DM13. Nevertheless, it is considered important to clarify the development will not be impacted by flooding nor increase the likelihood of flooding on adjacent sites. A Flood Consequences Assessment (FCA) has been produced as part of this application. The FCA considered all potential sources of flood risk including tidal, fluvial, surface water and overland flow routes, groundwater, sewers and reservoirs. It is important to note that the FCA assess three different parcels across the MoD complex, for the purposes of this application, only parcel 3 is considered relevant.

The assessment confirms that, according to TAN15 Development Advice Mapping, the site is located within Flood Zone A – considered to be at little or no risk of fluvial or tidal/coastal flooding. The site is shown to be located within Flood Zone 1 according to the NRW Flood Map for Planning. The site is considered to be at negligible to low risk of flooding from all sources. Additionally, the risk of the proposal resulting in flooding offsite is also considered negligible. As the solar panels will be inherently raised above surrounding ground levels, they are unlikely to be affected if any flooding were to occur onsite.

Ultimately, the assessment confirms that the site is considered to be at negligible to low risk of flooding from all sources. There will be no increase in surface water runoff and no change to existing drainage regimes within the site as a result of the proposed development. As a recommendation, the FCA states that appropriate land management (i.e. the potential planting of a suitable mix of vegetation between each row of panels to disperse the energy from the drip effect) is utilised over the lifetime of the proposed development to ensure there is no increase in surface water runoff from the site and thus no increase in downstream flood risk.

Ecology and Biodiversity

Policies DM14 and DM15 of the Ceredigion Local Development Plan require developments to demonstrate there will be no significant adverse impacts on biodiversity and that, where relevant, developments can aid in enhancing the natural environment. A Preliminary Ecological Appraisal (PEA) has therefore been submitted with this application to satisfy the above policies. The PEA evaluates potential ecological receptors and offers recommendations for further surveys, mitigations and enhancements. The PEA has assessed three separate areas across the MoD compound, it should be noted that for the purpose of this planning application, only area '3' is considered relevant.

The PEA confirms the site area to be a mixture of hardstanding and semi-improved neutral grassland. The hardstanding area is considered to have negligible intrinsic ecological value. Regarding the area comprises of neutral grassland, the PEA states that it is unlikely to support badgers, hedgehogs or great crested newts. The grassland does have some potential for invertebrate feeding and breeding, including once the development has been constructed. The loss of habitats is not considered to significantly impact the favourable conservation status of any bats present provided a suitable

lighting strategy is implemented. With regard to birds, the PEA states that there is an opportunity to provide bird boxes on the wider site, but the site in question has limited suitability for ground nesting birds. If nesting birds are found, this may result in substantial adjustment to the construction timetable.

The PEA confirms that a shadow Habitats Regulations Assessment to inform HRA Stage 1: Screening will be required. If there is a likely significant effect on the designated sites Stage 2 Appropriate Assessment might also be required. The HRA Stage 1 has been undertaken and is submitted as part of the application package.

The HRA Stage 1 states that without appropriate mitigation measures, the development will have a likely significant effect upon the conservation objectives of the qualifying features of Cardigan Bay SAC and West Wales SAC. The specific impacts relate to water pollution during construction and disturbance from construction activities. The HRA Stage 1 concludes that a Stage 2: Appropriate Assessment will need to be undertaken in order to detail mitigation measures that need to be put in place in order to protect the integrity of the designated site and its qualifying features. In addition, a Construction Environmental Management Plan (CEMP) will need to be produced as a result of the findings of this Statement to Inform HRA. This document will provide information on anti-pollution measures, timings of works and best practice to reduce dust in order to protect the integrity of the designated sites. Both the above documents will be submitted to the Local Authority in due course.

Landscape and Visual

Policies DM06 and DM10 of the Local Development Plan all explain what will be expected of applicants in terms of the effects of developments on the visual integrity of the surroundings. In order to satisfy these policies, a Landscape and Visual Appraisal has been undertaken to determine any potential visual effects of the development on the surrounding landscape. The methodology followed for this assessment were based on recommendations in Guidelines for Landscape and Visual Impact Assessment 3rd Edition published by The Landscape Institute and the Institute of Environmental Management & Assessment in 2013 (GLVIA3). The assessment considered the likely effects of the proposed development on the landscape character and visual amenity within a 2km study area.

The assessment clarifies that the development would be located on amenity grassland and underutilised hardstanding land slightly elevated above the areas of the site that are adjacent. In terms of landscape, the assessment considers the development would have a moderate adverse impact on the land as it changes use from hardstanding and grassland to accommodate the solar arrays. However, the assessment concludes that due to the context of its setting within the established MoD Aberporth compound, (which is noted in LANDMAP to be a landscape of low value and noted for its detracting elements), the assessment determines that the development would be in character and scale with this environment. It would result in only a minor adverse effect during construction and operation on the landscape character of the site. The assessment further states that a minor adverse effect is also anticipated on the setting of the adjacent landscape character area, on Parclyn, and on the Wales Coastal Path due to changes to their setting over small areas.

With regards to the visual impact arising from development, the assessment indicates that there will be a moderate adverse effect on residential properties along Parc-Y-Delyn to the south, which shares a similar topographic level with the site, however the solar panels would be seen within the context of the wider MoD compound. Views from the residential properties along Hillfield Road would

similarly see the solar panels within the context of the wider MoD compound rather than as a separate development. For walkers using the Wales Coastal Path and passersby on the minor road, the development site would only be visible for a short section of the route.

Furthermore, the assessment details that both during the construction phase and operational phase, the development would be readily identifiable in views from within 500m of the site. Beyond this approximate limit, topography, intervening vegetation and distance would largely filter the site in views to an extent that the proposed development would not create any visual effects, either adverse or beneficial. Weather conditions are also unlikely to have notable effect on visibility of the site within the 500m limit.

Measures for mitigation are provided within the assessment. The assessment states that the established openness and grassland character of the site should be maintained. The main recommendation is to plant a low hedgerow along the southern and western side of the panels and maintain the planting at a height lower than the surfaces of the panels. It is anticipated that this would soften their appearance in nearby views.

The application has also been supported by the inclusion of a Glint and Glare Assessment to determine any visual hazards or effects on residential amenity with regard to light-sensitive receptors. The assessment identified a total of thirteen building receptors (four on-site, nine off-site), five road receptors (one off-site, four on-site) and two flight paths.

Glint and Glare at the site is considered negligible in impact with only two identified onsite receptors potentially leading to disturbed vision. These specific routes are closest to the site boundary within the MoD compound, running along the southeastern portion of the site. Regarding off-site receptors, only one dwelling to the south across Hillfield Road and a small portion of the off-site route receptor (in front of this dwelling) is subject to glint and glare. The assessment states that this could largely be mitigated by existing vegetation. Ultimately, the glint and glare assessment concludes that glint and glare is envisaged to make minimal impact to both on and off-site receptors in real world conditions.

Following the implementation of recommended mitigation measures, including minimal additional screening, and given that the solar panels will merge seamlessly into the established MoD compound, it is considered that the development would comply with policies DM06 and DM10 of the Local Development Plan.

Archaeology and Heritage

Policy DM19 of the Local Development Plan emphasises the need to protect the historical and cultural landscape of Ceredigion. In this respect an Archaeological and Heritage Desk-Based Assessment has been conducted and submitted with this application. Within this assessment the site in question has been referenced as site 'B'. The assessment coordinated a study area for cultural heritage sites of 1km for non-designated assets and 3km for designated assets surrounding the site. This study area was defined in consultation with the Dyfed Historic Environment Record, and with the Archaeological Planning Manager at Dyfed Archaeological Trust.

The assessment first considers the potential impacts of designated heritage assets. It has determined that the development will have a low to negligible negative impacts on the surrounding Scheduled Monuments and Listed Buildings within the 3km study area. This level of harm is likely to increase in the event of a creation of a new landmark, which may affect the intervisibility from the Designated Historic Assets and the site location. In order to mitigate this, the assessment states that height

restrictions, which will not cause and will not affect the lack of visibility between the surrounding Designated Historic Assets, and the proposed development area should be considered.

The assessment also considers the potential for archaeological remains on the site. For the site in question, there is evidence to suggest that unrecorded archaeological remains of medieval to modern date may exist on site. These remains may be damaged or destroyed as a result of significant intrusive groundworks. The assessment therefore offers mitigation measures should any features or deposits survive *in situ*. Firstly, an undertaking of a Watching Brief during a ground or site investigation should be undertaken to identify any potentially previously unrecorded archaeological horizons, which may inform any additional archaeological works. Secondly, the assessment recommends the undertaking of a Watching Brief during development works to ensure the mitigation of any surviving archaeological deposits. The assessment clarifies that any further archaeological work should be undertaken in accordance with the standards and guidance from the Chartered Institute for Archaeologists, any requirements stipulated by the Local Authority, and a Written Scheme of Investigation (WSI) agreed in advance with the Dyfed Archaeological Trust. It is intended that this would be satisfied in a planning condition, should permission be granted.

Given the lack of proximity to designated heritage assets and the relatively low likelihood of archaeological remains being found on the site, it is considered that the development complies with Policy DM19 of the Local Development Plan.

Contaminated Land

Given the use of the wider MoD base as the location for weapons testing and the requirement of Policy DM22 of the Local Development Plan concerning environmental preservation, it is considered appropriate to detail land quality and any mitigation measures as part of this application. A Geo-environmental Phase 1 Assessment has therefore been produced and submitted with this application. The assessment has assessed 3 separate areas, however for the purpose of this planning application the site in question is referenced as 'Area 3'.

The assessment confirms that the southern portion of the development site has previously been developed on, with the extant buildings having been demolished, this indicates the potential for made ground on the site. Given the historic uses on the hardstanding portion of the site, there is potential contaminative land associated with below ground fuel storage.

The assessment concludes that the site is considered suitable for future development. It does however provide further recommendations. Further assessment of contamination sources should take place to confirm the extent of made ground and determine the presence and significance of potential contaminants. Further to this a ground investigation will be required to characterise the geotechnical characteristics of the site to facilitate construction. It is intended that this would be satisfied in a planning condition, should permission be granted. It is considered, providing the above-mentioned assessments are undertaken and adequate mitigations is applied if any future contamination is discovered on the site, the proposals satisfy Policy DM22 of the Local Development Plan.

Unexploded Ordnance

Given the use of the site for testing and evaluation of weapons systems continually since 1940, it has been deemed appropriate to submit an UXO detailed risk assessment (DRA) as part of the application submission.

The DRA clarifies that the identified parcel of land earmarked for development has never been used for live firing or dry training, with the testing of live munitions being conducted at the north of the MoD compound. Additionally, the potential presence of UXO is mitigated by the fact that these areas have been subject to moderate levels of post-war development and relatively high foot fall with no evidence available of UXO being encountered.

Nevertheless, the DRA does provide two main recommendations for implementation during the construction phase. Firstly, it recommends that all personnel on site during the ground works construction phase of the project should receive UXO awareness briefings and tool-box talks regarding the potential for encountering UXO. Secondly, if UXO is encountered the project should develop a site-specific Emergency Response Plan (ERP) detailing further actions that would need to be taken.

Conclusion

In conclusion, it is considered that the proposed installation of ground mounted solar panels, storage batteries and associated works would comply with the policies set out in the Ceredigion Local Development Plan and Welsh national policies set out in PPW 11.

The proposal is relatively small scale in terms of typical solar panel installations and would have limited visual impact on the nearest residential properties to the south. The location selected within the MoD compound is at low risk of land contamination and it is considered that once constructed, the panels would merge seamlessly into the surrounding compound.

The development would serve a particular purpose to ensure that this MOD site meets the Government's climate change obligations towards meeting net zero. It would therefore contribute towards the long-term sustainability and management of the wider MoD compound whilst utilising a currently vacant area of land with little ecological value.

Given the reasons detailed above, we would respectfully request that planning permission be granted for the development. If you have any queries or wish to discuss this proposal in more detail, then please do not hesitate to contact me.

Yours sincerely,



Samuel Beresford BA (Hons) MSc
Town Planner
Tetra Tech