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Charlotte Peacock
Development Manager
Wessex Solar Energy
Via Email

Eich Cyf / Your Ref:

Ein Cyf / Our Ref: DNS 3245065

Dyddiad / Date: 7 February 2020

Dear Ms Peacock

Town and Country Planning Act 1990
The Developments of National Significance (Procedure) (Wales) Order 2016
Town and Country Planning (Environmental Impact Assessment) (Wales)
Regulations 2017

Potential DNS Application

Site Address: Blackberry Lane, Cosheston, Pembrokeshire.

Proposed Development: 22MW Solar Park and associated infrastructure.

On 15 January 2020, the Planning Inspectorate received a request made under regulation 31(1) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 ("the Regulations"), for the Welsh Ministers to make a screening direction as to whether or not the development proposed is "EIA Development" within the meaning of the Regulations.

The Planning Inspectorate is authorised by the Welsh Ministers to provide that screening direction.

The project, as described above, falls within the description at paragraph 3(a) in column 1 of the table in Schedule 2 to the Regulations.

As the proposal is a potential Development of National Significance (DNS) application, the attached screening assessment identifies the key areas which have been considered. Having taken into account the selection criteria in Schedule 3 to the Regulations and the advice in Welsh Office Circular 11/99: Environmental Impact Assessment on establishing whether EIA is required, the assessment concludes that:

Habitats that would support a number of protected species have been identified within the proposed development site and there are a number of designated historic assets in the vicinity as well as archaeological remains on the site itself. These issues are likely to be an important consideration for the decision maker and will no doubt require further assessment, but I do not consider significant effects in these respects to be likely.

Rydym yn Croesawu Gohebiaeth yn Gymraeg a Saesneg

We Welcome Communications in Welsh and English

The proposed development site is also located close to the boundary of the Pembrokeshire Coast National Park and within the Hundelston & Lamphey Landscape Character Area; its proximity to existing solar farm development is such that there is potential for cumulative impacts in this respect. Based on the information provided by both the applicant and consultees and taking into account the scale and location of the development, the potential magnitude of the impacts and the possibility of effectively reducing a number of the potential impacts, I consider that on balance, without further assessment, significant effects in this respect must be considered likely. Therefore, notwithstanding the lack of likely significant effects in other respects, for this reason I consider that the proposed development is 'EIA development' and that EIA is required in this instance.

Therefore, in exercise of the powers conferred by the Regulations and the authority referred to above, the Welsh Ministers hereby direct that the development subject of this application **is EIA development** within the meaning of the Regulations.

Consequently, this application must be accompanied by an Environmental Statement. Under regulation 17(1) of the Regulations an Environmental Statement must contain, for the purpose of assessing the likely impact on the environment, the information specified in that regulation. It is recommended that you refer to the Regulations and the accompanying Circular, Welsh Office Circular 11/99, before and during the preparation of the Environmental Statement. In the meantime, you may wish to have regard to the particular environmental topics identified in the attached screening assessment.

This letter will be copied to Pembrokeshire County Council, so that this screening direction is placed on Part 1 of the Planning Register in relation to the application in question, in accordance with the Regulations.

Yours sincerely

C Sweet

Christopher Sweet MPlan
Planning Officer

Planning & Environment Team
The Planning Inspectorate

STAGE 1 – INITIAL EIA SCREENING ASSESSMENT

1 Case Details	
A	Case reference 3245065
B	Brief description of development 22MW Solar Park and associated infrastructure.
2 EIA Screening Details	
2A Schedule 1	
	Is the project Schedule 1 development as described in Schedule 1 of the EIA Regulations? No
	<i>If Yes, under which description of development? If No, consider whether project is 'Schedule 2' development below in part 2(B).</i>
2B Schedule 2	
(i)	Is the project listed as a description of development under Column 1 of Schedule 2 of the EIA Regulations? Yes
	<i>If Yes, under which description of development? If No, EIA is not required.</i>
	3(a)
(ii)	Does the project change or extend development described in paragraphs 1 to 12 of Column 1 of schedule 2, where the change or extension may have SIGNIFICANT* adverse effects on the environment? No
	<i>If Yes, provide reasons for your answer below. *If unsure, discuss with PET. Proceed to point (iii).</i>
	Choose an item.
(iii)	Is the project located wholly or partly within a ' Sensitive Area ' as defined by Regulation 2 of the EIA Regulations? No
	<i>If Yes, state which area and more to Question 3. If No, proceed to point (iv) below.</i>
(iv)	Are the applicable thresholds/criteria in Column 2 exceeded / met? Yes
	<i>If Yes, note which applicable threshold/criteria. If No, EIA is not required.</i>
3 LPA / Welsh Ministers' Screening	
(i)	Has the LPA issued a Screening Opinion (SO)? Yes

(ii)	Have the Welsh Ministers issued a Screening Direction (SD)?	No
4	Environmental Statement (ES)	
	Has the applicant/appellant supplied an ES for the current or previous (if reserved matters or conditions) application?	No

Is a detailed screening assessment (Section 5) required?

If Yes has been answered in response to either 2B(iii) or 2B(iv), send to relevant team to undertake detailed screening assessment.

If No has been answered for both questions, or the questions are not applicable, start appeal.

Sign-off

Signature	C Sweet
Date	05/02/20

STAGE 2 – DETAILED EIA SCREENING ASSESSMENT

As per Schedule 3, Para 3: When considering the potential impact, take into account; (a) magnitude / spatial extent / population likely to be affected; (b) nature of impact; (c) transboundary nature; (d) intensity & complexity; (e) probability; (f) expected onset / duration / frequency & reversibility; (g) cumulation with existing and / or approved development; (h) the possibility of effectively reducing the impact.

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects likely to be significant? <i>Include consideration of features or measures to avoid or prevent what might otherwise be significant effects</i>
CRITERION 1. CHARACTERISTICS OF DEVELOPMENT		
Question 1(a) Size and design of the Development		
Will construction, operation or decommissioning of the Project involve actions which will cause physical changes in the locality (topography, land use, changes in waterbodies, etc.)?	Yes, the use of the site would be altered from solely agricultural use to that of a solar park, with some use for grazing of animals, for a term of 40 years. A number of physical works and additional planting would form part of the scheme. However, given the scale of the site and the extent of the works required, I do not consider significant effects in this respect to be likely.	Significant effect unlikely .
Question 1(b) Cumulation with Existing and/or Approved Development		
Are there any other factors which should be considered such as: <ul style="list-style-type: none"> • consequential development which could lead to environmental effects? • the potential for cumulative impacts with other existing or planned activities in the locality? • any plans for future land uses on or around the location which could be affected by the project? • transfrontier impacts? 	Yes, there is potential for cumulative visual impact arising from the scheme in combination with existing solar farm development to the north west and south east of the site. I agree with NRW and the LPA that this will require further assessment and that significant effects should be considered likely, as set out below.	Significant effect likely .
Question 1(c) Use of Natural Resources, in particular land, soil, water and biodiversity		

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects likely to be significant?
Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or in short supply?	Yes, some resource use would be involved in the construction and operation of the proposed development, but it would also provide a significant source of renewable energy. As such, I am satisfied that significant effects in this respect are unlikely.	Significant effect unlikely .
Question 1(d) Production of Waste		
Will the Project produce solid wastes during construction or operation or decommissioning?	Yes, the decommissioning of the equipment at the end of its lifespan would result in solid waste. However, much of that waste could be recycled and it can reasonably be expected that appropriate practice will be followed in disposing of any residual waste. Significant effects are therefore unlikely.	Significant effect unlikely .
Question 1(e) Pollution and Nuisances		
Will the Project involve use, storage, transport, handling or production of substances or materials which could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?	No.	N/A
Will the Project cause noise and vibration or release of light, heat energy or electromagnetic radiation?	A degree of noise and vibration would be likely during construction, but the scale and time limited nature of those effects would be such that they would not be significant.	Significant effect unlikely .
Will the Project release pollutants or any hazardous, toxic or noxious substances to air , or lead to risks of contamination of land or water (including surface waters, groundwater, coastal waters or the sea)?	No. Although there is a degree of groundwater sensitivity in this location, it can reasonably be expected that appropriate construction methods and mitigation, if necessary, could be readily secured in the	Significant effect unlikely .

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects likely to be significant?
	planning process. As such, I do not consider that significant effects are likely in this respect.	
Question 1(f) Risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge		
Will there be any risk of accidents during construction or operation of the Project which could affect human health or the environment?	Some small risk of accident during construction and decommissioning, but the scale of operations would be such that this would not be significant.	Significant effect unlikely .
Question 1(g) Risks to Human Health (for example due to water contamination or air pollution)		
Will there be any risk to human health during the construction and/or operation of the development	No.	N/A
CRITERION 2. LOCATION OF DEVELOPMENT		
Question 2(a) Existing and Approved Land Use		
Will the Project result in social changes, for example, in demography, traditional lifestyles, employment?	No.	N/A
Are there any routes or facilities on or around the location, which are used by the public for access to recreation or other facilities, which could be affected by the project?	Yes, there are a number of Public Rights of Way in the area around the appeal site, some of which would be visually affected by the proposed development. However, given the likely scale of that impact and the extent of the PRoW that would be affected, I do not consider that significant effects in this respect are likely.	Significant effect unlikely .
Are there any transport routes which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	No.	N/A

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects likely to be significant?
Is the project located in a previously undeveloped area where there will be loss of greenfield land?	Yes. However, the site could still be used for grazing to a certain degree and as such, these impacts would be significant.	Significant effect unlikely .
Are there any areas on or around the location occupied by land uses which could be affected by the project, particularly sensitive land uses e.g. hospitals, schools, places of worship, community facilities?	There is a church (St Mary) located close to the site which may be impacted visually and in its capacity as a listed building. There is also potential for some disturbance during construction. However, given the scale of the likely impacts and the limited effect on the Church's use as a place of worship, I am satisfied that significant effects in this respect are unlikely.	Significant effect unlikely .
Question 2(b) Relative Abundance, Availability Quality and Regenerative Capacity of Natural Resources in the Area and its Underground		
Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project?	<p>Yes, the site itself is within an area designated as a principal aquifer and is located within a Source Protection Zone 1 for public water supply. It is therefore sensitive in terms of its groundwater.</p> <p>However, advice from NRW suggests that there are adopted approaches in place to avoid contamination of groundwater from the use of pipelines or fluid filled cables where their use is unavoidable. A containment system to prevent accidental fluid leak from the oil filled transformer would be used to avoid contamination in that respect.</p> <p>I consider that the measures necessary to</p>	Significant effect unlikely .

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects likely to be significant?
	<p>avoid contamination of groundwater could be readily secured via the planning process and that as such, significant effects in this respect are unlikely.</p> <p>The Pembrokeshire Coast National Park (the NP) lies to the north of the site and it is likely that there would be some visual impact which would have the potential to impact on the tourism value derived from the NP's special qualities. However, the scale of the proposed development coupled with the site's position outside the NP itself are such that, when considered across the area of the NP as a whole, significant effects in respect of tourism are also unlikely.</p>	
Question 2(c) Absorption Capacity of the Natural Environment		
<p>Are there any other areas on or around the location which are important or sensitive for reasons of their ecology, or are used by protected, important or sensitive species of fauna or flora, which could be affected by the project?</p>	<p>The submitted Preliminary Ecological Appraisal (PEA) suggests that boundary features across the site are likely to be used by commuting bats and that a number of trees and woodland groups within and around the site contain potential bat roost features. NRW recommend further survey work if such suitable trees are to be affected and note the potential requirement for a licence if bats are to be disturbed.</p> <p>There is also hedgerow which has the potential to support dormouse and badgers that would require the use of appropriate mitigation measures during construction and</p>	<p>Significant effect unlikely.</p>

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects likely to be significant?
	<p>operation.</p> <p>However, given that those measures could readily be secured via the planning process and taking into account the scale of the proposed development and potential impact and the need for a licence to be obtained for certain works, I consider that significant effects in respect of protected species are unlikely.</p>	
<p>Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?</p>	<p>See above in relation to groundwater.</p>	<p>Significant effect unlikely.</p>
<p>Are there any areas or features of high landscape or scenic value on or around the location which could be affected by the project?</p>	<p>Yes, the site is within Hundelston & Lamphey Landscape Character Area (within the draft Pembs CC LCA). The boundary of the NP is located some 120m to the north and the site is therefore also within its setting.</p> <p>Given the type and scale of development proposed, the potential for cumulative visual impact with other existing solar farm development and the proximity to the NP, I agree with NRW that a full LVIA is required.</p> <p>The submitted LVA concludes that there would be a number of instances of moderate effects, which as NRW points out, can be considered significant for EIA. Moreover, NRW has unresolved concerns, which I share, about the potential for significant effects from views towards the NP, among others. I also consider that further</p>	<p>Significant effect likely.</p>

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects likely to be significant?
	<p>assessment is required to properly take account of the potential for cumulative impacts with existing development.</p> <p>I acknowledge that additional planting would be provided to reinforce existing natural screening and that perimeter hedgerows would be managed to a height of 3.5m in order to aid absorption into the landscape. I consider that these measures could be readily secured by planning condition.</p> <p>However, on balance, given the specific nature and spatial extent of the potential impact, even when taking account of the possibility of effectively reducing that impact, I consider that without further consideration, significant effects must be considered likely in this respect.</p>	
Is the project in a location where it is likely to be highly visible to many people?	Yes. The proposal would be visible from a number of viewpoints. As noted above, on balance I consider that significant environmental effects must be considered likely in this respect.	Significant effect likely .
Are there any areas on or around the location which are densely populated or built-up, which could be affected by the project?	No.	N/A
Are there any areas or features of historic or cultural importance on or around the location which could be affected by the project?	Yes, there are a number of Listed Buildings, Scheduled Ancient Monuments and Registered Historic Parks and Gardens in the	Significant effect unlikely .

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects likely to be significant?
	<p>vicinity of the site. There is therefore potential for impact on the settings of those designated assets. However, I concur with the view of Cadw that further assessment will be required, but that the scale of impact is not likely to be significant such that it would require EIA.</p> <p>In addition, the submitted PEA notes that there are archaeological remains on site which are undated and have the potential to be of local or regional importance. The site is therefore sensitive in this respect.</p> <p>However, the PEA also concludes that subject to a suitable package of mitigation, the archaeological interest of the remains could be secured whilst allowing the site to be developed. I have nothing to suggest that would not be the case.</p> <p>Any such measures could readily be secured by planning condition and as such, I am content that the possibility of effectively reducing the potential impact is such that any effects are unlikely to be significant in this respect.</p>	
Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	No.	N/A
Is the project location susceptible to	No.	N/A

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects likely to be significant?
subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions, which could cause the project to present environmental problems?		
Has there already been a failure to meet environmental quality standards that is relevant to the project?	No.	N/A

Statement of reasons – insert into Screening Direction

Habitats that would support a number of protected species have been identified within the proposed development site and there are a number of designated historic assets in the vicinity as well as archaeological remains on the site itself. These issues are likely to be an important consideration for the decision maker and will no doubt require further assessment, but I do not consider significant effects in these respects to be likely.

The proposed development site is also located close to the boundary of the Pembrokeshire Coast National Park and within the Hundelston & Lamphey Landscape Character Area; its proximity to existing solar farm development is such that there is potential for cumulative impacts in this respect. Based on the information provided by both the applicant and consultees and taking into account the scale and location of the development, the potential magnitude of the impacts and the possibility of effectively reducing a number of the potential impacts, I consider that on balance, without further assessment, significant effects in this respect must be considered likely. Therefore, notwithstanding the lack of likely significant effects in other respects, for this reason I consider that the proposed development is 'EIA development' and that EIA is required in this instance.

6		Outcome of assessment	
(ii)	If a SO/SD has been provided do you agree with it?	N/A	
(iii)	Is EIA required?	Yes	
Outcome		Action	
<p>Schedule 2 development – threshold exceeded/ criterion met or Sensitive Area but not likely to have significant effects on the environment</p>		Issue direction stating EIA Not Required (Letter 1)	
<p>Schedule 2 development – threshold exceeded/ criterion met or Sensitive Area and likely to have significant effects</p>		Issue direction stating EIA Required (Letter 2)	
<p>Project does not fall within the EIA Regulations as either: (a) it is listed within the descriptions of development Column 1 of Schedule 2 of the EIA Regulations but does not meet relevant threshold/criterion; or (b) it does not fall within the categories of development in Column 1 of Schedule 2 of the EIA Regulations.</p>		EIA Not Required - Issue direction stating either: (A) project listed within descriptions of development in Column 1 of Schedule 2 of the EIA Regs but does not meet relevant threshold/criterion; or (B) project does not fall within the categories of development in Column 1 of Schedule 2 of the EIA Regs (Letter 3)	
<p>Schedule 2 development but effects not clear at this stage – file to be reviewed at a later stage</p>		No action – review when appropriate i.e. on receipt of new information/case progress	
<p>Schedule 2 development – appeal is at an advanced stage – referred for Direction; likely to have significant effects</p>		Issue direction stating EIA Required (Letter 4)	
<p>Development relates to a Report case, i.e. where the Welsh Ministers will make the final decision.</p>		Ensure Welsh Government are copied in to Screening Direction when it is issued.	
Name and Job Title of Assessor		Chris Sweet – Planning Officer	
Date of Assessment		07/02/20	

Date • Dyddiad 30/01/2020

Your ref • Eich cyfeirnod

My ref • Fy nghyfeirnod SO/0426/19

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Please ask for
Os gwelwch yn dda gofynnwch am

Mike Simmons

Christopher Sweet
The Planning Inspectorate

By email only:
policy.wales@planninginspectorate.gov.uk

Dear Mr Sweet

Proposal: **22MW Solar Park and associated infrastructure**

Location: **Blackberry Lane, Coshaston, Pembrokeshire**

I refer to your correspondence dated 31st January 2020 (date in error?) under reference DNS 3245065. The Planning Inspectorate (PINS) has requested advice as to whether development is likely to have any significant environmental effects and whether the proposal is EIA development.

You are aware of this Council's previous Screening Opinion that was adopted on 8th November 2013 (PCC reference SC/0459/13) for a similar proposal. It was concluded at that time that the development did not require Environmental Impact Assessment because the development was not likely to have significant effects on the environment.

This previous determination was made under The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (as amended). The development is broadly similar to that presented in 2013. However it is noted that the solar park would be for a period of 40 years rather than the previously suggested 25 years. A Preliminary Environment Appraisal has also been submitted (PEA).

Having regard to The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) (the 2017 Regs), the case as to whether the development requires EIA is considered to be more marginal. The PEA also suggests that there is high potential for important archaeological remains at the site that may be of regional importance. Potential cumulative effects, most particularly in respect of an existing solar farm approximately 1.1km to the west, must also be given weight. Whilst there is the possibility for visual/landscape and ecological effects, as well as impacts during the construction phase, to be mitigated

in order to prevent what might otherwise have been significant adverse effects on the environment, having regard to the information submitted and when considering the criteria in Schedule 3 of the 2017 Regs, the potential for significant environmental effects cannot be discounted and therefore the development appears to be EIA development.

It is noted that correspondence from Wessex Solar Energy dated 15th January 2020 states that pre-application advice from Pembrokeshire County Council will be sought (as well as from The Planning Inspectorate). The Council await the pre-application submission with requisite fee from Wessex Solar Energy. I shall forward a copy of the Council's pre-application response in due course.

Yours sincerely

MASimmons

DEVELOPMENT MANAGEMENT SECTION

Maes Newydd
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Neath Port Talbot
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Ebost/Email:
swplanning@cyfoethnaturiolcymru.gov.uk

Mr. Christopher Sweet
The Planning Inspectorate
Crown Buildings
Cathays Park
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CF10 3NQ

31 January 2020

Annwyl / Dear Mr. Sweet,

TOWN AND COUNTRY PLANNING ACT 1990

**THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016
(AS AMENDED)
TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (WALES)
REGULATIONS 2017 (AS AMENDED) ('THE REGULATIONS')**

POTENTIAL DNS APPLICATION

SITE ADDRESS: BLACKBERRY LANE, COSHESTON, PEMBROKESHIRE.

PROPOSED DEVELOPMENT: 22MW SOLAR PARK AND ASSOCIATED
INFRASTRUCTURE.

Thank you for your letter dated 17 January 2020 requesting Natural Resources Wales's (NRW) views on whether the above proposed development is likely to have a significant environmental effect.

We have considered the following information:

- '*Blackberry Lane Solar Park: Request for Screening / Scoping Opinion*', dated January 2020, by Wessex Solar Energy Ltd.
- '*Blackberry Lane Solar Park: Preliminary Environmental Assessment Report (Volume 1)*', dated January 2020, by Wessex Solar Energy Ltd, and;
- '*Blackberry Lane Solar Park: Preliminary Environmental Assessment Report (Volume 2 - Figures)*', dated January 2020, by Wessex Solar Energy Ltd, and;

Despite the submission of this information we cannot confirm whether the proposal will have a significant environmental effect in relation to certain matters. Therefore, without the provision of further detail and clarification, we consider that the proposed development may have the potential to have significant environmental effects.

Our view on the likelihood of significant effect on each of the environmental interests identified, is set out below:

Landscape

Within the Preliminary Environmental Assessment Report, is the document entitled: '*Landscape and Visual Appraisal for Blackberry Lane Solar Farm, Pembrokeshire*', dated November 2019, by Stephenson Halliday Ltd.

Having reviewed the information currently available to use, we wish to make the following comments:

The proposed site is comprised of 8 fields covering a total area close to 36.9 hectares, while the Pembrokeshire Coast National Park (PCNP) lies approximately 120-metres to the north of the site. The site also lies within the setting of the National Park.

The site boundaries are comprised of a mixture of trees and hedgerow, with a woodland block adjacent to the the northern part of the site. We note that Section 5.5 and 5.6 of the Appraisal states that the boundaries would be retained and strengthened, with supplementary planting and managed to a height of 3.5-metres.

Although the Appraisal considers that there would be a short-term temporary loss of grassland, in visual terms, the majority of the grassland would be covered by solar panels. The Appraisal also considers the site to be enclosed, however the site is comprised of several large fields which are highly visible in a number of views, where boundary trees and hedgerows provide limited enclosure.

Section 2.5 the Appraisal states that Major and Major/Moderate effects are considered equivalent to significant effects in EIA Regulations. However, in relation to EIA, we would also wish to highlight that Moderate effects can also be considered significant.

Section 6.5 the Appraisal also considers that the residual effect on the landscape fabric would be beneficial due to the hedgerow improvements. However, this would depend on the future management of the following decommissioning.

The site lies within LCA25 (Hundleston & Lamphey) as defined in the Draft Pembrokeshire County Council Landscape Character Assessment. The Appraisal considers the potential effects on this Landscape Character Area to be Minor adverse.

However, there are a number of views within this area towards the National Park where the development is likely to be prominent with Major, Moderate/Major or Moderate effects likely, in our opinion.

The site also lies close to LCA28 (Daugleddau) as defined in the National Park's Landscape Character Assessment. Although within the National Park, this area is of High/Medium sensitivity, due to its enclosed nature with woodland and hedgerows.

The Appraisal considers the potential effects on this LCA to be Moderate adverse. Visibility from this area, within the National Park is considered in the Appraisal to be limited and localised due to intervening landform and hedgerow/tree cover. Nevertheless, there are views in which the development would be highly visible, with likely Major or Major/Moderate effects, likely in our opinion.

The Appraisal considers the effects on the National Park Purposes and Special Qualities to be Minor adverse. The requirement to have regard to the purpose to conserve and the enhance natural beauty applies within the setting as well as within the National Park. Adverse effects on views towards the park have the potential to detract from the natural beauty of the park.

Although Section 2.10 of the Appraisal mentions the presence of two existing solar farms to the north west and south east of the site, we do not consider that the Appraisal has given sufficiently detailed consideration to the potential cumulative effects, from these existing developments.

Therefore, we advise that an assessment of Landscape and Visual Cumulative effects should be included as part of a full Landscape and Visual Impact Assessment, for this proposal.

To conclude, we consider that:

- The development would be prominent in some views towards the National Park (1, 2, 5 & 8) and from viewpoints within the park (4 & 7).
- The proposal has the potential for significant adverse visual effects in views towards and from the National Park and on its setting.
- Effects on the landscape character within the National Park are unlikely to be significant in our opinion.

Geoscience

The site is located on karstic Carboniferous Limestone which has been designated as a Principal Aquifer, able to support large abstraction for public water supply. The site is also located within a Source Protection Zone 1 (SPZ1) for a public water supply at Milton.

We note that the construction phase of the development will involving running electrical cables below ground, while the operational phase of the development would involve the presence of an oil-filled transformer (*although we note that this will have a specifically designed containment system / bund to ensure that any accidental leak cannot discharge to the environment*).

Given the sensitivity of groundwater at this site we advise that further information is provided as part of any future planning application in relation to whether the development would involve the use of any fluid-filled cables, or whether the development could impact upon any existing fluid-filled cables, which may cross the site.

Within the guidance document entitled; '*Approach to Groundwater Protection*', issued by the Environment Agency (and adopted by Natural Resources Wales), there is a position statement relating to the use of fluid filled cables within SPZ1. If fluid filled cables are used on site we would object to their use, as per the position statement.

Where there is an existing or unavoidable need for pipelines, or fluid filled cables to pass through SPZ1 or SPZ2, operators are expected to adopt Best Available Technology (BAT) and operate in accordance with the Energy Networks Association guidance.

Therefore, we recommend that these matters are clarified in order to allow NRW to provide full comments.

European Protected Species

The Preliminary Ecological Appraisal (*dated November 2019*), by Environmental Solutions Ltd includes details of desktop surveys and an Extended Phase 1 Habitat Survey, of the site which took place on the 24 June 2019.

Bats

Section 4.10 of the Appraisal states that: *'some boundary trees contained features that would be considered suitable for use by roosting bats (see Target Notes 3, 4, 5, 13 and 15).'*

It goes on to say that; *'It is considered likely that the boundary features across the site would be used by commuting bats.'*

However, it is unclear whether there are any trees with potential roosting features (PRF's), across the rest of the development site, or whether any such trees would be impacted by the development. This needs to be clarified.

Should the development require the removal of any trees, then these should also be assessed for potential bat roosting features. Trees identified as having moderate or higher bat potential features will require further inspection, such as tree climbing and/or endoscope inspections. These surveys/assessments will be required, prior to determination of any future planning application.

Any surveys to be undertaken should be carried out in accordance with best practice guidance and by suitably licenced and experienced ecologists.

Dormouse

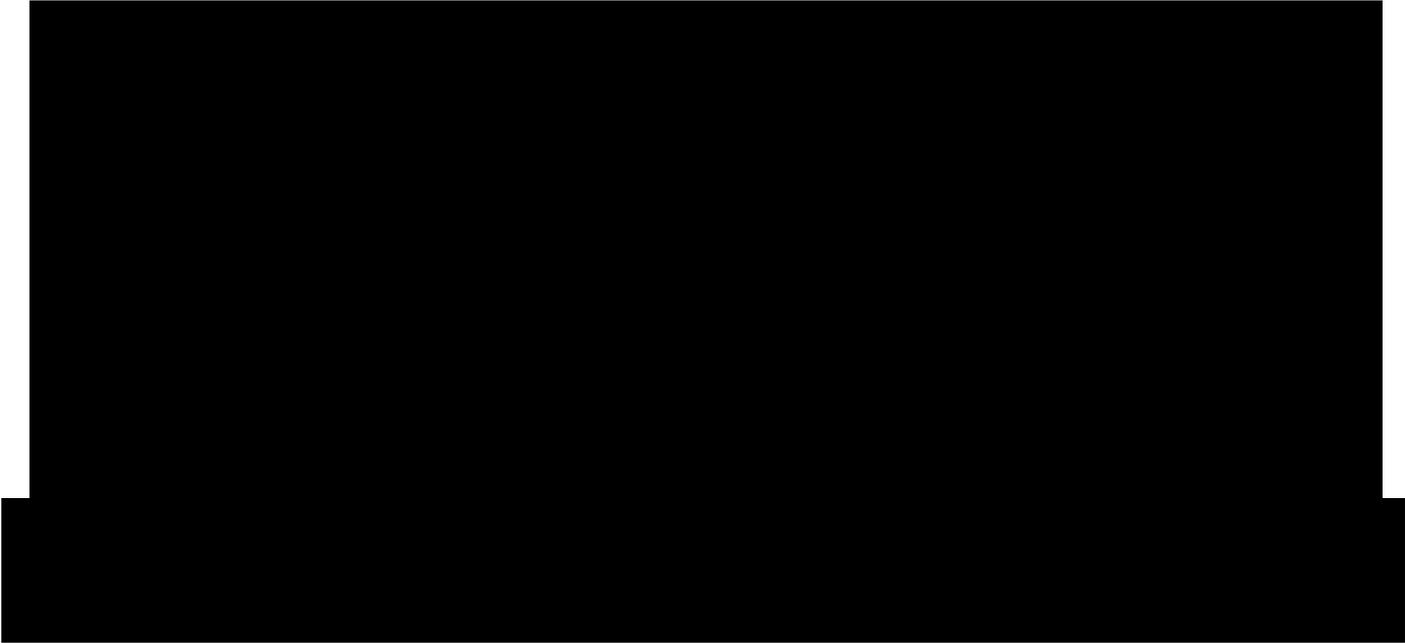
Section 4.11 of the Preliminary Ecological Appraisal, states that; *'the hedgerows on the site are of low to moderate quality but do contain hazel and honeysuckle and have good links to adjacent woodland and hedgerows habitat, which has potential to support dormouse.'*

However, the desk study did not return any records of dormouse within 3 km of the site. Therefore, providing that a precautionary 5-metre stand-off from suitable hedgerows is maintained, as suggested in Section 5.10, then we do not anticipate any likely significant effect in relation to the species.

We also advise that addition information / confirmation should be provided in relation to any lighting that will be used / in-place during the construction and operational phase of the development. The inappropriate siting or use of lighting can result in impacts upon protected species. Therefore, it should be ensured that dark corridors are maintained along hedgerows and other boundary features.

Other Protected Species

Badger



Protected Sites

The following protected sites are within 2 km of the application site.

- Pembrokeshire Marine Special Area of Conservation (SAC)
- Carew Castle Site of Special Scientific Interest (SSSI)
- Milford Haven Waterway Site of Special Scientific Interest (SSSI)

We do not consider that there are likely to be any significant effects to the features of these protected sites as a result of this proposal.

Watercourses

We do not consider that the proposal is likely to have significant effects on the watercourses in the vicinity, providing that appropriate buffer zones along watercourses are put in place, along with the implementation of robust pollution prevention measures during construction, to mitigate any impacts to water quality.

Other Matters

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our [website](#).

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Aled Roderick
Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales



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Eich cyfeirnod Your reference	DNS 3245065
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Dyddiad Date	30 January 2020
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Dear Chris Sweet,

PROPOSED DEVELOPMENT: EIA Screening - 22MW Solar Park and associated infrastructure
LOCATION: Blackberry Lane, Cosheston, Pembrokeshire

Thank you for your email of 17 January asking for Cadw's view on the likely impact of the proposed development described above on the environment and whether or not Environmental Impact Assessment (EIA) is required.

Cadw, as the Welsh Government's historic environment service, has assessed the characteristics of this proposed development and its location within the historic environment. In particular, the likely impact on designated or registered historic assets of national importance. In assessing if the likely impact of the development is significant Cadw has considered the extent to which the proposals affect those nationally important historic assets that form the historic environment, including scheduled ancient monuments, listed buildings, registered historic parks, gardens and landscapes.

These views are provided without prejudice to the Welsh Government's consideration of the matter, should it come before it formally for determination.

Our records show that the following historic assets are potentially affected by the proposal.

Listed Buildings:

5937	Carew Castle	I
5938	The Carew Cross	I
5942	Carew Inn	II
5943	No. 9 Picton Terrace, Carew Village, Tenby, DYFED, SA70 8SL	II
5955	St Michael's Church	II
5956	Hill House and Garden Wall	II
5957	Paskeston Hall	II

Mae'r Gwasanaeth Amgylchedd Hanesyddol Llywodraeth Cymru (Cadw) yn hyrwyddo gwaith cadwraeth ar gyfer amgylchedd hanesyddol Cymru a gwerthfawrogiad ohono.

The Welsh Government Historic Environment Service (Cadw) promotes the conservation and appreciation of Wales's historic environment.

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg.
We welcome correspondence in both English and Welsh.



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5988	Church of St Mary	II
5989	Upper Nash Farmhouse	II
6309	Bangeston Hall	II
6603	Castle Lodge	II
6604	No. 6 Picton Terrace, Carew Village, Tenby, DYFED, SA70 8SL	II
17266	Brewery Inn	II
17267	Funeral Car Tenement	II
17270	Little Mayeston	II
17271	Lower Nash Corn Mill	II
18198	Castle Entrance Gatepiers and Old Cobbler's Shop	II
18199	No 1 & 2	II
18201	Old Stable Cottage	II
18202	No. 5 Picton Terrace, Carew Village, Tenby, SA70 8SL	II
18203	No. 7 Picton Terrace, Carew Village, Tenby, SA70 8SL	II
18204	No. 8 Picton Terrace, Carew Village, Tenby, SA70 8SL	II
18219	Milepost near Carew Cricket Ground	II

Scheduled Ancient Monuments:

PE001 Carew Castle
PE009 Carew Cross

Registered Historic Parks and Gardens:

PGW (Dy) 34(PEM) Lamphey Bishop's Palace & Lamphey Court (grade II*)
PGW (Dy) 45(PEM) Upton Castle (grade II)

The request for a screening direction was accompanied by a screening/scoping report produced by Wessex Solar Energy and also by a plan showing the Zone of Theoretical Visual Impact for the proposed solar farm. The above designated heritage assets are located inside 3km of the proposed solar farm and are inside the submitted ZTV.

As such there is a potential for the solar farm to have an impact on the settings of the above designated heritage assets and it is noted that screening/scoping report indicates that the level of impact will be assessed before the application is submitted. This full assessment should be undertaken; however, our initial assessment is that the scale of these impacts will not be of such significance to require an EIA to be produced.

The screening/scoping report states that the assessment of the impact of the proposed solar on the setting of the designated heritage assets will be carried out in accordance with the Welsh Government guidance given in the document "The Setting of Historic Assets in Wales". We would expect all of the designated heritage assets listed above to be the subject of a stage 1 assessment which will determine the need, if necessary, for stages 2 to 4 to be carried out for specific heritage assets.

Yours sincerely

Jenna Arnold
Diogelu a Pholisi/ Protection and Policy