

# **BLACKBERRY LANE SOLAR PARK**



**Planning Statement**

**December 2020**

**Document Reference Number: BL006**

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## Contents

1	Planning Statement .....	1
1.1	Introduction to the project .....	1
1.2	Community Involvement .....	1
1.3	Planning History.....	3
1.4	Site Description .....	3
1.5	The Proposed Development.....	4
1.5.1	Project Layout .....	5
1.5.2	Site Access .....	5
1.5.3	Construction of the Project .....	6
1.6	Key Benefits .....	6
2	Planning Policy Context.....	9
2.1	Introduction .....	9
2.2	The Planning Framework .....	9
2.2.1	National Planning Policy & Guidance.....	9
2.3	Local Planning Policy.....	15
2.3.1	Pembrokeshire Local Development Plan .....	15
3	Key Planning Considerations.....	18
3.1.1	Climate Change.....	18
3.1.2	Uptake of Renewable Energy .....	18
3.1.3	Contribution towards Sustainable Development .....	19
3.1.4	Appropriateness of the Project and the Proposed Site .....	19
3.1.5	Limited Period of Operation .....	19
3.1.6	Environmental impacts .....	20
4	Summary and Conclusion .....	24

Appendix 1 Schedule of Planning Policies & Commentary

## List of Abbreviations

<b>AC</b>	Alternating Current
<b>AOD</b>	Above Ordnance Datum
<b>DNS</b>	Development of National Significance
<b>EIA</b>	Environmental Impact Assessment
<b>ES</b>	Environmental Statement
<b>ha</b>	hectares
<b>HGV</b>	Heavy Goods Vehicle
<b>km</b>	kilometres
<b>kV</b>	kilovolt
<b>kWh</b>	kilowatt hours
<b>LDP</b>	Local Development Plan
<b>m</b>	metres
<b>mm</b>	millimetre
<b>MW</b>	Megawatts
<b>NO<sub>x</sub></b>	oxides of nitrogen
<b>PM<sub>10</sub></b>	particulate matter of less than 10 microns
<b>PV</b>	photovoltaic
<b>PPW</b>	Planning Policy Wales
<b>SAC</b>	Special Area of Conservation
<b>SIA</b>	Settings Impact Assessment
<b>SPG</b>	Supplementary Planning Guidance
<b>SSSI</b>	Site of Special Scientific Interest
<b>SO<sub>2</sub></b>	sulphur dioxide
<b>TAN</b>	Technical Advice Notes
<b>UK</b>	United Kingdom
<b>VOCs</b>	Volatile Organic Compounds
<b>WSE</b>	Wessex Solar Energy
<b>ZVI</b>	theoretical visual influence

## 1 Planning Statement

1. This document provides a summary of the relevant planning policy and material planning matters that relate to the proposed Blackberry Lane Solar Park. To the extent that is practical the document does not repeat significant amounts of information can be found elsewhere in the planning application documentation. It should therefore be read in conjunction with the full set of documents that form the planning application.

### 1.1 Introduction to the project

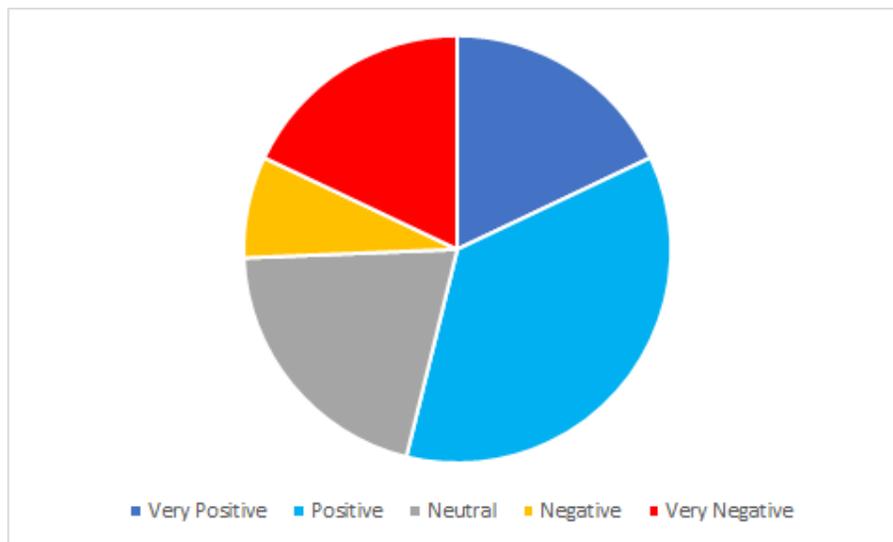
2. Wessex Solar Energy proposes to construct a solar park capable of exporting up to 22 Megawatts (MW) at Alternating Current (AC) of clean, renewable electricity in a sustainable manner. The Solar Park will be located approximately 0.7 kilometres (km) south east of Cosheston, and approximately 2.5 km north east of Pembroke.
3. Solar energy is an unlimited energy resource. Solar radiation can be harnessed either to produce hot water, known as a 'solar thermal', or electricity. Electricity can be generated using either photovoltaic (PV) cells or by arranging reflective surfaces which focus the sunlight onto a single point, which then heats water to produce steam to drive steam turbines.
4. For the purposes of the proposed development, PV cells represent the preferred technology. PV technology is uncomplicated. The technology is found on most modern calculators and can be used to generate electricity on a large scale. It is increasingly used on rooftop or 'building integrated' schemes in the UK to reduce the carbon footprint of housing or other developments. It has also been commercially proven on large scale multi-megawatt generation plants since the 1990's.
5. To ensure that the project has taken into consideration the potential environmental and social issues associated with the development, Wessex Solar Energy (WSE) has undertaken an Environmental Impact Assessment (EIA) and other associated studies for the project.
6. This document provides details of planning policy and material planning considerations that are relevant to the proposed development.

### 1.2 Community Involvement

7. Consultation with the local community and other stakeholders is seen by WSE as an important part of the development process.
8. The nature of the development is such that it will have relatively localised impacts when compared to a project such as a wind farm which can be seen over many miles.
9. In more normal times WSE would hold public information days / drop-in session to allow residents the chance to talk through our proposals. However due to Covid-19 restrictions we have had to find new ways to undertake this engagement.

10. Based on a zone of theoretical visual influence (ZVI) and site visits we therefore identified 466 properties which either had potential views of and/or who lived not far from the site.
11. An information booklet was prepared based on the information usually included in our drop-in sessions with additional information added to reflect frequently asked questions about solar parks.
12. The booklet was sent to the 466 properties along with a feedback form and a pre-paid return envelope. The booklet and feedback form included options to request a call back by telephone or a reply to any questions by email / in writing to try and ensure that wherever possible we could provide the information that residents might wish to have. In total 38 people responded to this consultation by post and three by email.
13. Following publication of the draft application documentation, a further information booklet was sent to the same 466 properties informing them that the draft application documents were available to view and providing details of how they could contact us should they have any queries. As a result of this further consultation exercise one person responded by post and two by email.
14. A summary of the general feedback received is provided below with full information on the exercise undertaken included within the Pre-Application Consultation Report (Doc BL007).

**Plate 1: Feedback Summary**



15. Further to the above consultation with residents WSE contacted Cosheston Community Council to introduce the proposed Development. WSE made an offer to talk to the council at any stage in the application process including via Zoom calls or similar due to Covid-19 restrictions.
16. Following formal notification of the draft application, Cosheston Community Council requested a meeting to discuss the proposed Development. On the 1<sup>st</sup> December a

presentation was provided online to the community council followed by a question-and-answer session with councillors and members of the public who attended. Details of the issues discussed are provided within the Pre-Application Consultation Report (Doc BL007). WSE will continue to liaise with the Community Council through the planning process.

### **1.3 Planning History**

17. The proposed development is a Development of National Significance (DNS) under the Developments of National Significance (Procedure) (Wales) Order 2016, and the application is therefore submitted to the Welsh Planning Inspectorate (PINS Wales) for determination.
18. Solar Farm developments are not specifically listed under either Schedule 1 or Schedule developments of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017, referred to as the EIA Regulations. However, the regulations do state that energy development, including “industrial installations for the production of electricity” covering an area exceeding 0.5 ha, are Schedule 2 developments.
19. An EIA Screening Direction issued by PINS Wales on 7<sup>th</sup> February 2020 directed that the proposed Development is considered to be EIA development under the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017.

### **1.4 Site Description**

20. The Solar Park will be located approximately 0.7 kilometres (km) south east of Cosheston, and approximately 2.5 km north east of Pembroke. There are a small number of scattered houses in the vicinity of the proposed Solar Park site. The closest of these is Nash Villa (located approximately 130 metres (m) south west of the proposed site boundary at the nearest point).
21. The location of the proposed Solar Park site is shown in Figure 1.1, and the site boundary (and indicative site layout) is shown in Figure 1.2. The proposed Solar Park site is centred at Ordnance Survey Grid Reference 201645, 203240. The proposed site comprises 8 fields (arable), covering a total area of approximately 34.25 hectares (ha). Further details regarding the agricultural activity across the site are provided within the Agricultural Assessment Report which is provided in separate documentation.
22. There are no public footpaths or bridleways that cross the proposed site. The nearest footpaths form the western site boundary. Further details of nearby public rights of way are provided in ES Volume 1 Chapter 8: Landscape and Visual.
23. The site is flat for the most part, with a north-south slope which is more exaggerated in the northern part of the site. The site altitude varies from approximately 35 m Above Ordnance Datum (AOD) to approximately 20 m AOD.
24. The nearest landscape designation (or at least designation with landscape implications) is the Pembrokeshire Coast National Park, located approximately 120 m to the north of the proposed site. Further information on potential landscape and visual impacts is provided in ES Volume 1 Chapter 8 (Landscape and Visual).

25. The proposed Solar Park site is not located within any internationally, European or nationally designated ecological sites. The closest are the Pembrokeshire Marine / Sir Benfro Forol Special Area of Conservation (SAC) (approximately 1 km to the west at its nearest point) and the Milford Haven Waterway Site of Special Scientific Interest (SSSI) (approximately 650 m to the north east at its nearest point). Further information on ecology and ornithology is provided in ES Volume 1 Chapter 9 (Ecology and Ornithology).
26. There are no World Heritage Sites within 5 km of the proposed site. There is a Registered Park / Garden located approximately 510 m to the north east of the proposed site. There are no Scheduled Ancient Monuments within the proposed Solar Park site boundary. The closest Scheduled Ancient Monument is located approximately 1.5 km to the south. Further information on cultural heritage / archaeology is provided in ES Volume 1 Chapter 10 (Cultural Heritage / Archaeology).
27. Site access would be along the A447, turning onto the access road to Lower Nash Farm and entering the site via an existing access point in the south west corner of the south western most field. These roads are used frequently by large farm vehicles and HGVs.

## 1.5 The Proposed Development

28. The full details of the propose development are set out in the ES and to avoid repetition are not replicated here in full. The key elements of the proposed Solar Park are as follows:

**Table 1.1: Key Elements of Proposed Solar Park Project**

Element of Proposed Scheme	Details
Approximate Number of PV Panels (PV Cells)	70,000
Panel Size	2210mm x 1130mm
Panel Angle	Up to 22 degrees
Number of Inverters	Up to 12
Number of Transformers	Up to 12
Inverter / Transformer Cabin Dimensions (m)	10.4 m (length) by 2.6 m (width), and 3.18 m (height).
Control Building Dimensions (m)	7 m (length) by 3 m (width), and 4 m (height).
Perimeter Fence (m)	2.5 m (height)

Element of Proposed Scheme	Details
Electrical Connection	<p>The PV Cells will require interconnection within the proposed Solar Park site to Inverters that will convert the low voltage DC to low voltage AC. In turn, the Inverters will connect to Transformers that will convert the low voltage AC to higher voltage AC (33 kV) for export to the regional electricity grid.</p> <p>Electricity will be exported to the regional electricity grid via an underground cable to the existing Golden Hill 33 / 132 kV Substation located approximately 2.3 km to the south west. This is operated by Western Power Distribution (WPD), the local distribution network operator. Details of the off-site connection works are provided in Chapter 16.</p>
Onsite Access Track	<p>The onsite access track would be constructed from compacted stone or aggregate. The total length of the onsite access track will be approximately 2km.</p>
Temporary Site Compound / Laydown Area	<p>The Temporary Site Compound / Laydown Area would be approximately 1600 m<sup>2</sup>, and would include an area of hard standing / gravel which will house a temporary office and welfare facility (including a port-a-loo). This Compound / Area will also be used for the parking of staff vehicles and the storage of construction equipment / vehicles / materials. An additional HGV turning area will also be incorporated into the designated compound area as shown in Figure 6.6.</p>

### 1.5.1 Project Layout

29. Throughout the development of the proposed Development design, Wessex Solar Energy has sought to minimise the impact of the Solar Park, especially with regard to the impacts associated with landscape and visual amenity and ecology. Further information on how this was done is provided in ES Volume 1 Chapter 8.
30. Figure 1.2 of the Environmental Statement Volume 3 illustrates the proposed general site layout of the key elements as envisaged, subject to any minor micro-siting. These include: the PV panels, the inverter and transformer buildings, the control building and the proposed access track.

### 1.5.2 Site Access

31. The exact location of the PV panel and Inverter / Transformer manufacturers will not be known until the receipt of planning permission and award of the construction contracts. However, from the motorway network, access to the proposed Solar Park site would be achieved from the M4. Deliveries are anticipated to approach the site

along the M4, A48, A40, A447, turning onto the access track to Lower Nash Farm, all of which are frequently used by large vehicles.

32. Access onto the proposed Solar Park site would be through an existing site access point located in the south west corner of the proposed site.

### 1.5.3 Construction of the Project

33. Following receipt of the planning permission and award of construction contracts, it is anticipated that it could take as little as 4 months to construct the Solar Park.

34. Full details of the construction works, phasing etc are included in the Environmental Statement but are not reproduced in this document to avoid duplication.

35. Construction working hours will be restricted to the following, with no working on Saturdays, Sundays or Bank Holidays:

Monday to Friday 08:00 to 18:00

36. Any deviations from these times will be agreed in advance with the Local Authority.

37. The principal activities during the construction of the Solar Park include:

- Constructing the limited site access road and site compound / laydown area (plus any other enabling works);
- Installation of perimeter fencing;
- Excavating and constructing the electrical buildings foundations / skid mounts;
- Constructing and installing of the inverter and transformer / electrical buildings, and installation of PV panel support structures;
- Transporting and assembling the panel mounting systems;
- Mounting the PV panels on the mounting systems;
- Installing the electrical collection system (cables etc);
- Commissioning and energising the Solar Park; and
- Site re-instatement and any enhancement measures.

## 1.6 Key Benefits

38. In spring 2019 the Welsh and UK Governments both declared a Climate Emergency recognising the significant risks of continuing to emit greenhouse gases to the future wellbeing of our planet. For many years now the development of renewable energy projects in the UK, such as the proposed Solar Park, has principally been driven by initiatives and targets set by successive governments to combat this climate threat.

39. Chapter 3 of Environmental Statement Volume 1 provides a detailed review of the national and international drivers for combatting climate changes and the national measures put in place to ensure that the UK reaches a position of “Net Zero” carbon emissions by 2050.

40. In addition to playing a major role in achieving Government targets for renewable energy and thereby tackling climate change, solar energy has a number of additional benefits for the region and the UK, including:
- Economic benefits – in terms of UK construction and maintenance jobs etc.
  - Power supply benefits – by increasing diversity and security of electricity supply.
  - Environmental benefits – reduced emissions of pollutants in addition to carbon dioxide

**Economic impacts / benefits:**

41. The development of renewable energy schemes presents an economic opportunity both nationally and at a regional and local level. It is estimated by the government in 2017 that £79.6 billion turnover in the UK economy was generated directly and indirectly by businesses active in the low carbon and renewable energy economy.
42. Solar projects such as that proposed by WSE can help stimulate business investment in a sector with enormous growth potential.
43. It is considered that the project will have a beneficial impact with regard to socio-economics in the wider area. The proposed development represents a total investment of the order of £10 million in isolation, a proportion of which will be spent in the local area, primarily on civil and electrical contractors. Wessex Solar Energy will encourage the contractor who will construct the project to use locally sourced materials and locally based contractors as part of their proposals so as to maximise the benefit to the local economy.
44. The potential for investment in new and emerging renewable energy technologies must also be seen against the potential impacts of not taking action to combat climate change. Climate change could perhaps reduce global GDP by 5 per cent year on year 'now and forever' whilst the costs associated with combating global climate change could be as little as 1 per cent of global GDP (Stern Report 2005). The risks to the UK economy such predictions are correct are plain to see and it is considered that it is through projects such as the proposed Solar Park that this threat can be combated.

**Electricity Supply Benefits**

45. The use of renewable energy, such as that which would be generated from the proposed Solar Park, will add to the diversity of the UK electricity generation sector helping to maintain the reliability of supplies and represents an inexhaustible supply. Renewable energy also has advantages relating to slowing the depletion of finite fossil fuel reserves. North Sea oil and gas supplies have meant the UK in more recent times has been self-sufficient in energy but this cannot be maintained, leaving the country potentially vulnerable to price fluctuations and interruptions to supply caused by regulatory failures, political instability or conflict in other parts of the world.
46. The Solar Park will also help to reduce the transmission losses associated with the transfer of electricity along long lengths of transmission lines from conventional power stations. As the proposed project will be "embedded generation" (i.e. generating electricity directly into the local power distribution network) it reduces the

distance the electricity travels and reduces these small losses of power. By contrast, energy from large power stations has to be transmitted on high voltage power lines and travels long distances before point of use. The Solar Park will therefore contribute towards the efficiency of the UK distribution system and further reduce the harmful emissions generated by thermal power plant.

47. There are a number of annual average UK household electricity consumptions quoted by various credible sources. BEIS now estimates the average consumption to be below 4,000 kWh with average consumption in 2017 being about 3,760 kWh. It can be calculated using the 2017 figure that the proposed Solar Park will provide up to 7,825 households with renewable energy annually.

### **Environmental Benefits**

48. In addition to the benefits associated with reduced emissions of greenhouse gases, other external environmental costs of conventional generation are avoided, including poor air quality and the damage to the natural and built environment caused by acid rain, as in addition to the prevention of emissions of carbon dioxide (the main greenhouse gas), the use of solar power prevents the emissions of the acid gases and local air quality pollutants such as sulphur dioxide (SO<sub>2</sub>) oxides of nitrogen (NO<sub>x</sub>), particulate matter of less than 10 microns (PM10s) and Volatile Organic Compounds (VOCs). Producing energy from the proposed Solar Park would reduce the quantities of these pollutants being produced in the UK, thus helping the UK government's environmental and social objectives. In addition, there is no requirement for fuel transportation.
49. During operation, the land will be available for use around the PV panels, with sterilised areas of land essentially being the electrical and inverter buildings. Also, when compared to conventional power stations, solar parks are easily and quickly decommissioned, and any visual impact is totally reversible.
50. With regard to local environmental issues, the project will, of course, have an impact on the existing environmental baseline at the proposed site, which has been assessed as part of the EIA. However, mitigating measures will be employed to help minimise the impact of the project and, in some cases, improve the existing environment.

## 2 Planning Policy Context

### 2.1 Introduction

51. This Section provides the planning policy context relevant to the development of the proposed Solar Park. This Section covers:
- The Planning Framework;
  - National Planning Policy; and,
  - Local Planning Policy.

### 2.2 The Planning Framework

52. The Planning and Compulsory Purchase Act 2004 requires that all planning decisions are 'plan led'. The Act also provides the statutory basis for the 'plan led' system and is particularly important in that it establishes a statutory purpose for planning, namely the achievement of sustainable development. Section 38(6) of the Act states that:

*"...if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".*

53. In essence, any consideration which relates to the use and development of land is capable of being 'material'.
54. The Act also outlines in detail in Part 6 the requirements of the Welsh Government in terms of putting Planning Policy in place in terms of the "National Development Framework for Wales". Parts of the framework relevant to the proposed development are discussed further later in this document as appropriate.

#### 2.2.1 National Planning Policy & Guidance

55. There are a number of documents that are relevant to the project in terms of national planning policy and guidance. These are addressed below.

##### 2.2.1.1 Welsh Renewable Energy Policy

56. The Welsh Government's Policy Statement "A Low Carbon Revolution: Wales Energy Policy Statement" (March 2010) sets out the aims of the Government's renewable energy policy as well as advice to Local Planning Authorities on its implementation.
57. The Policy Statement sets ambitious targets for the deployment of renewable energy in Wales. While it is mostly focussed on the development of wind energy projects this is primarily because other forms of renewable energy were not perceived to be widely available or cost effective at the time. Due to technology improvements and cost reductions the deployment of solar energy projects in the UK is now cost effective and is indeed widespread and rapidly expanding.

### 2.2.1.2 *Wales Spatial Plan*

58. As a statutory requirement of the Planning and Compulsory Purchase Act 2004 the Welsh Government was required to produce a Spatial Plan for Wales to set out the strategic framework to guide future development and policy in Wales. The Wales Spatial Plan: People, Places Futures was adopted by the National Assembly for Wales in November 2004, covering a 20-year period, and was updated in July 2008.
59. The Plan aims to align infrastructure investment with spatial development in the ‘Pembrokeshire - The Haven’ region, i.e. the region within which the proposed solar farm is located. There is little of the documentation that is especially relevant to the proposed development albeit that it does aim to facilitate “diversification of the energy sector.”

### 2.2.1.3 *Future Wales: The National Plan 2040 (draft)*

60. The National Plan is currently in draft and sets out where the Welsh Government think the country should try to grow and the types of development needed over the next twenty years to help Wales be a sustainable and prosperous society. It is understood that the Minister intend to ensure FW2040 will be in place by February 2021
61. The plan states that “  
*“The challenges of climate change demand urgent action on carbon emissions and the planning system must help Wales lead the way in promoting and delivering a competitive, sustainable decarbonised society. Decarbonisation and renewable energy commitments and targets will be treated as opportunities to build a more resilient and equitable low-carbon economy, develop clean and efficient transport infrastructure, improve public health and generate skilled jobs in new sectors.”*
62. Naturally as a national level document the content is relevant mostly in broad terms. Of particular relevance to the proposed Blackberry Lane Solar Park are the following policies which are replicated in full in Appendix A:
- Policy 8 – Strategic framework for biodiversity enhancement and ecosystem resilience”;
  - Policy 11 – Wind and Solar Energy Outside of Priority Areas for Solar and Wind
63. It is considered that the project is supported by these policies which require that projects do not give rise to unacceptable environmental impacts, something which is demonstrated by the various studies that are reported within the Environmental Statement.

### 2.2.1.4 *Planning Policy Wales 10 (2018)*

64. The Planning Policy Wales (PPW10) document (2018) contains land use planning policies for Wales and sets out the framework for Local Authorities to prepare their development plans and is a material consideration in the determination of planning applications.
65. The document makes significant references to the need to move to a low carbon, renewable energy based economy in Wales and strongly recognises the issues associated with our changing climate.

66. It also sets a renewable energy target for Wales to generate 70 per cent of its electricity consumption from renewable energy by 2030, something that will require rapid deployment of projects such as the proposed Solar Park if it is to be achieved.
67. The document identifies the benefits of renewable and low carbon energy, as part of the overall commitment to tackle climate change and increase energy security recognising it to be of “paramount importance”. It goes on to say that:

*“The planning system should:*

- integrate development with the provision of additional electricity grid network infrastructure;*
- optimise energy storage;*
- facilitate the integration of sustainable building design principles in new development;*
- optimise the location of new developments to allow for efficient use of resources;*
- maximise renewable and low carbon energy generation;*
- maximise the use of local energy sources, such as district heating networks;*
- minimise the carbon impact of other energy generation; and*
- move away from the extraction of energy minerals, the burning of which is carbon intensive.”*

68. With specific regard to renewable energy the document starts that:

*“Planning authorities should facilitate all forms of renewable and low carbon energy development. In doing so, planning authorities should seek to ensure their area’s full potential for renewable and low carbon energy generation is maximised and renewable energy targets are achieved.....*

*....Planning authorities must develop an evidence base to inform the development of renewable and low carbon energy policies. Planning authorities should:*

- take into account the contribution their area can make towards the reduction of carbon emission and increasing renewable and low carbon energy production;*
- recognise that approaches for the deployment of renewable and low carbon energy technologies will vary;*
- identify the accessible and deliverable renewable energy resource potential for their area, including heat, and consider the likely utilisation of this resource over the plan period;*
- assess the social, economic, environmental and cultural impacts and opportunities arising from renewable and low carbon energy development;*

- *take into account the cumulative impact of renewable and low carbon energy development and their associated infrastructure, for example grid connections;*
  - *identify criteria for determining applications for sites based on their installed capacity;*
  - *engage with the renewable energy development industry and consider the deliverability of schemes;*
  - *take into account issues associated with grid connection (see Grid Infrastructure section) and the transportation network; and*
  - *consider local and strategic priorities for renewable energy.”*
69. It is clear PPW in principle strongly supports to fight to combat climate change through the uptake of renewable energy generation such as the proposed Solar Park.

#### **2.2.1.5** *Welsh Government – Technical Advice Notes*

70. The Welsh Government has produced Technical Advice Notes (TANs) which should be read alongside the PPW document, both of which should be taken into account by Local Authorities when they are preparing development plans and determining planning applications.
71. TANs of relevance to the proposed Solar Park include:
- TAN 5 – Nature Conservation and Planning: The TAN describes how Local Authorities should have regard to the need to safeguard ecological characteristics (e.g. protected species). The proposed Solar Park is not predicted to have adverse impacts on habitats or protected species (ES Volume 1 Chapter 9 contains a detailed assessment).
  - TAN 6 – Agriculture and Rural Development: This TAN outlines who Local Authorities should consider the quality of agricultural land as well as other agricultural aspects. The studies for the proposed Solar Park include an assessment of land quality (ES Volume 2 A.5.1). The reasons for the use of the site are discussed within the Agricultural Assessment Report (ES Volume 2 A.5.2)
  - TAN 8 – Renewable Energy: This TAN provides a number of recommendations for Local Authorities to consider when determining applications for renewable energy developments. Specifically relating the solar PV developments the TAN states that “Other than in circumstances where visual impact is critically damaging to a listed building, ancient monument or a conservation area vista, proposals for appropriately designed solar thermal and PV systems should be supported” ES Volume 1 Chapter 10 contains a detailed assessment of potential impacts on cultural heritage assets and concludes that there will be no unacceptable adverse impacts on such assets.
  - TAN 18 – Transport: TAN 18 provides guidance on the integration of transport and land use planning; integration between different types of transport; integration of transport policy with policies for the environment, education, social

justice, health, economic development and wealth creation. ES Volume 1 Chapter 13 provides an assessment of the potential impacts of the development on the transport network.

#### *2.2.1.6 Other guidance and relevant material*

##### ***Planning Implications of Renewable and Low Carbon Energy February 2011***

72. In addition to Tan 8, the Welsh Government Practice Guidance: Planning Implications of Renewable and Low Carbon Energy February 2011 is worthy of note. It summarises the potential impacts of solar parks and possible options for mitigation and enhancement measures as part of any projects based in Wales. Specifically, it highlights the need to address the following issues as appropriate.

- Landscape and visual;
- Glint and glare;
- Ecology;
- Historic environment;
- Agriculture;
- Hydrology and flood risk; and
- Cumulative impacts.

##### ***Well Being of Future Generations (Wales) Act 2015***

73. During the course of the scoping of the EIA it was also highlighted that consideration may need to be given to the Well Being of Future Generations (Wales) Act 2015.

74. The Act places a duty on public bodies to place the principles of sustainability and sustainable development at the heart of its decision-making processes. It also makes it clear that the global effort to combat climate change is of critical importance in decision making. Its objectives can be summarised as follows:

##### *“A Prosperous Wales*

- *Promoting resource-efficient and climate change resilient settlement patterns which minimise land take and urban sprawl, especially through the reuse of suitable previously developed land and buildings, wherever possible avoiding development on greenfield sites;*
- *Play an appropriate role to facilitate sustainable building standards;*
- *Play an appropriate role in securing the provision of infrastructure to form the*
- *physical basis for sustainable communities;*

- *Support initiative and innovation and avoid places unnecessary burdens on enterprises so as to enhance the economic success of both urban and rural areas, helping businesses to maximise their competitiveness; A Resilient Wales*
- *Contributing to the protection and improvement of the environment, so as to improve the quality of life, and protect local and global ecosystems;*

#### *A Healthier Wales*

- *Contribute to the protection and, where possible, the improvement of people's health and wellbeing as a core component of achieving the well-being goals and responding to climate change; A More Equal Wales*
- *Promoting access to, inter alia, employment, shopping, education and community facilities and open and green space, maximising opportunities for community development and social welfare;*
- *Promote quality, lasting, environmentally-sound and flexible employment opportunities;*
- *Respect and encourage diversity in the local economy;*

#### *A Wales of Cohesive Communities*

- *The location of development so as to minimise the demand for travel, especially by private car;*
- *Fostering improvement to transport facilities and services which maintain or improve accessibility to services and facilities, secure employment, economic and environmental objectives, and improve safety and amenity.*
- *Fostering social inclusion by ensuring that full advantage is taken of the opportunities to secure a more accessible environment for everyone that the development of land and buildings provides. This includes helping to ensure that the development is accessible by means other than the private car;*

#### *A Wales of Vibrant Culture and Thriving Welsh Language*

- *Helping to ensure the conservation of the historic environment and cultural heritage;*
- *Positively contribute to the well-being of the Welsh language; A Globally Responsive Wales*
- *Support the need to tackle the causes of climate change by moving towards a low carbon economy.”*

75. The importance of the policy was highlighted by the Welsh government in for form of a letter from the Minister for Natural Resources Letter to Planning Lead Members, Chief Planning Officers and Planning Inspectorate Wales dated 15th March 2016

76. In the letter the Minister states:

*“When taking decisions on local planning policies and individual development management decisions consideration should be given to the overall context of helping to tackle climate change and delivering the sustainable development duty placed on all public bodies by the Well-being of Future Generations (Wales) Act. This needs to happen for all renewable energy and low carbon technologies and at all scales from nationally significant projects to community and individual building scale schemes.*

*Our planning policies in Planning Policy Wales (PPW) are clear that the planning system should support the transition to a low carbon society and that local planning authorities should facilitate the development of all forms of renewable and low carbon energy. In addition, PPW states that the economic benefits associated with a proposed development are understood and these are given appropriate consideration in the decision-making process.*

*I appreciate that visual and amenity impact on surrounding communities and properties is an important issue (and policies are in place to protect against unacceptably adverse impacts) and that discussions of this nature can become quite emotive during the planning process.*

*However planning decisions need to be taken in the wider public interest and in a rational way, informed by evidence, where these issues are balanced against other factors. At the larger scale, the new Developments of National Significant (DNS) system, introduced on 1 March will consider these issues on a strategic level for energy projects, taking into account policies in development plans and Planning Policy Wales.”*

## 2.3 Local Planning Policy

### 2.3.1 Pembrokeshire Local Development Plan

77. The proposed Solar Park site falls within the jurisdiction of the Pembrokeshire County Council. Therefore, at the local level relevant planning documentation is that contained in the Pembrokeshire County Council Local Development Plan (LDP) which was adopted in February 2013. It should be noted that the council is in the process of its review of the plan which commenced in 2017.

78. A revised LDP is due to be adopted sometime in late 2021 depending on the impacts of Covid-19 to the inspection process. For the purposes of this report it is assumed that it is the existing LDP policies that carry the most weight.

79. From a review of the proposals maps contained within the LDP the only policy which is directly applicable to the site itself is Hard Rock Resource Policy GN22. However, there are a series of other policies that re considered to be relevant more generally to the project site. The list of policies considered to be relevant include:

- SP 1 Sustainable Development

- SP 11 Waste
  - SP 16 The Countryside
  - GN.1 General Development Policy
  - GN.2 Sustainable Design
  - GN.3 Infrastructure and New Development
  - GN.4 Resource Efficiency and Renewable and Low-carbon Energy Proposals
  - GN.10 Farm Diversification
  - GN.22 Prior Extraction of the Mineral Resource
  - GN.37 Protection and Enhancement of Biodiversity
  - GN.38 Protection and Enhancement of the Historic Environment
80. The various policies outlined above are replicated in the table included in Appendix A of this document along with a commentary on where the policy is relevant to the project and where additional information is provided in the various documents that accompany the planning application:
81. In addition to the core LDP there are relevant local council guidance notes and baseline documents as follows:
- Pembrokeshire County Council Landscape Character Assessment (Consultation Draft), July 2019
  - Renewable Energy Supplementary Planning Guidance (SPG) (Oct 2016).
- Renewable Energy Supplementary Planning Guidance (SPG) 2016
82. The Renewable Energy Supplementary Planning Guidance notes the following as being relevant to solar park planning applications. The EIA has addressed considerations where relevant to the project and its site.
- “Application Considerations: Pre-Application considerations +plus:*
- *Equipment detail & design (expected output, equipment typology, colour, finish, etc)*
  - *Scale - Landscape context & character (LANDMAP, Landscape Management Plan)*
  - *Landscape sensitivity (PCNPA, Landscapes of Historic Importance, statutory designations, etc)*

- *Quality & Grading of Agricultural Land*
- *Visual Impact Assessment, sightlines, photomontages (consider the impact on the skyline, important vistas, landscape openness / vegetation / tree cover)*
- *Glint/Glare & consideration of night time lighting for security purposes*
- *Sensitivity of receptors – Local resident / tourists / business +/-*
- *Social & economic impact (business impact/ diversification/ local community benefits)*
- *Natural environment, ecology & ornithology (Ecological Management Plan)*
- *Hydrology (Drainage, Flood Consequences Assessment, etc)*
- *Telecommunications & HSE constraints, including aviation / radar / rail, MOD constraints, etc*
- *Electronic communication interference*
- *Pollution considerations*
- *Access information, including a Construction Method Statement & Management Plan & a Transport Management Plan where appropriate*
- *Screening / EIA*
- *AA / HRA*
- *Cumulative Impact considerations, including the relationship to other solar & consented renewable schemes, and to other large structures within the landscape context, taking care to avoid cluttering or visual discord. Cumulative impact can also include the impact on the natural and historic environment, etc”*

### 3 Key Planning Considerations

83. As noted above, there are several policies at a local level which have been identified as being relevant to the proposals and are therefore important to address in the determination of the planning application for the proposed Solar Park. Whilst these policies have individually been discussed in the table, which is presented in Appendix A of this document, this section considers them together within the context of other broader issues. National policies by their nature are broader and are discussed as required in the text below.

#### 3.1.1 Climate Change

84. Both the UK and Welsh Governments have declared climate emergencies in response to the threat of global climate change as have Pembrokeshire County Council in May 2019. In their meeting where Pembrokeshire's climate emergency was declared county councillors also stated a desire for the council to become a net zero carbon local authority as early as 2030.
85. The declaration of climate emergencies is of course just the latest policy position in a long pattern of governments and council putting in place the measures to combat climate change and the greenhouse gases that drive that change.
86. The imperative to switch to a low carbon economy and tackle climate change has been reinforced time and again including, as discussed in Section 2, by the Minister for Natural Resources who emphasised the need to reflect the "Well-being of Future Generations (Wales) Act" in decision making on renewable energy projects.
87. The Blackberry Lane Solar Park would make a significant contribution to the fight against the emission of greenhouse gases through the provision of clean, renewable energy providing on average 7,825 homes with electricity.
88. It is considered that there is a clear policy commitment at all levels of government to combatting the emission of greenhouse gases that lead to climate change. This is a significant material consideration that favours the Blackberry Lane Solar Park being awarded planning consent.

#### 3.1.2 Uptake of Renewable Energy

89. There are international and national targets for both the development of renewable energy projects and the reduction of greenhouse gas emissions. If these targets are to be achieved, a quick, sustained, and substantial acceleration is needed in the development of renewable energy projects, with solar energy making an important contribution.
90. These targets exist not only to combat climate change but also to help ensure that the UK becomes less dependent of energy sources overseas and that the generation of electricity becomes more localised adding to its sustainability.
91. These targets are backed up by a wealth of national and local policy that support the active uptake on renewable energy. At a local level the Local Development Plan includes a policy in the form of GN4 that strongly supports development which enable the supply of renewable energy through environmentally acceptable solutions.

92. It is considered that the proposed Solar Park has the potential to help the Council and the Country meet renewable energy targets whilst avoiding the installation of relatively more intrusive renewable energy projects, such as onshore wind farms.

### 3.1.3 Contribution towards Sustainable Development

93. Renewable energy projects, such as the proposed Solar Park, provide local supplies from green, carbon-neutral sources. These projects are very much a demonstration of sustainable development in action. The development of renewable energy projects is essential in contributing to national targets for renewable energy generation.
94. In addition, through displacing electricity currently generated by fossil-fuel fired power plants, the proposed Solar Park will avoid the emission of pollutants (including CO<sub>2</sub>, SO<sub>2</sub> and NO<sub>x</sub>) associated with such power plants.
95. Solar Parks also represent embedded electricity generation, feeding renewable energy into the grid, invariably at closer to the point of use, therefore often removing the need for extensive additional transmission lines and reducing the transmission losses associated with transporting electricity over longer distances.
96. The undoubted benefits of electricity generated by renewable energy projects embedded in the local grid network, such as the proposed Solar Park, is a further highly significant material consideration.

### 3.1.4 Appropriateness of the Project and the Proposed Site

97. In terms of the appropriateness of the proposed site, the application for Planning Permission follows a process including site selection and initial desktop technical feasibility studies. These are documented within ES Volume 1 Chapter 5: Site Selection and Consideration of Alternatives.
98. This process identified the proposed Solar Park site as being technically suitable for the development of a 22 MW Solar Park. It is considered that there are a number of advantages of the proposed site that make it suitable for the development of a Solar Park. Amongst others, these advantages include:
- Its location in an area of the UK that has a high level of solar radiation and good levels of direct sunlight;
  - The availability of land of a sufficient area to accommodate a 22 MW Solar Park; and,
  - Its proximity to the regional electricity grid such that significant off-site works (with the associated environmental and commercial costs) are not required.

### 3.1.5 Limited Period of Operation

99. Compared to other power generation technologies, Solar Parks can be easily and economically decommissioned and removed at the end of their economic life (typically expected to be about 40 years). Following decommissioning and removal,

the site can then be restored close to its original condition such that there would be little (and in some cases no) trace that a Solar Park had existed.

100. The limited period of operation, and ease of decommissioning, is therefore considered to be an additional favourable material consideration.

### **3.1.6 Environmental impacts**

101. Environmental policies and commentary are included across all parts of UK Government, Welsh Government and Local County Council documentation. The Pembrokeshire County Council Local Development Plan contains, as might be expected, the most locally relevant content.
102. For ease of reading the various environmental and technical issues are addressed below under the relevant subheadings. Appendix A of this document provides a policy by policy review.

#### ***3.1.6.1 Landscape and visual, including Glint and Glare***

103. Due to the nature of solar parks the principal impact tends to be visibility, and this must be seen in the context of the wider economic, environmental and social benefits. A Full Landscape and Visual Impact Assessment (LVIA) has been undertaken for the proposed development. The full report is available in ES Volume 1 Chapter 8.
104. The report concluded that the proposed solar park would not lead to unacceptable impacts that would be in any way significant in environmental assessment terms. It noted that there would be a temporary loss of farmland that would become pasture once the physical construction works had been completed. Field boundaries are proposed to be strengthened through additional planting and managed to grow to a height of 4 m to help mitigate views into the site.
105. Visual impacts as is the case for most solar parks were highlighted as being more pronounced the closer viewers were to the site with the assessment including a detailed analysis of impacts from a variety of local receptors. However, no impacts were considered to be significant in EIA terms.
106. Impacts on Landscape Character were not predicted to be significant whilst impacts to the National Park would be slight at worst in the long term. The report also highlighted that the long term yet temporary nature of the proposals, meant that potential operational effects would be reversible. The residual effects on the landscape fabric would therefore be beneficial as the improvements to hedgerows to be retained would be permanent.
107. With specific regard to Glint and glare from the proposed site a detailed computer analysis was undertaken for the site. It found that the existing screening by vegetation, buildings and topography will eliminate glint effects at the majority of the receptor points analysed. In addition, potential residual glint effects on residential properties, roads, public rights of way, cultural heritage receptors and selected viewpoints are not considered to be significant and therefore no additional mitigation measures are recommended or required.

108. In terms of policy GN1 supports development where it does not result in a significant detrimental impact on amenity. With regard to visual impacts and amenity more generally the EIA has not found that there would be any significant impacts and therefore the project is considered to be supported by the policy.

#### ***3.1.6.2 Ecology and Ornithology***

109. Full details of the Ecological and Ornithological assessments undertaken for the project site are included in ES Volume 1 Chapter 9.
110. No significant effects are anticipated for designated sites, habitats, or species as a result of the proposed solar park. Similarly, there are not predicted to be any unacceptable impacts with regard to onsite ecology or ornithology receptors.
111. The habitat creation/enhancement measures and changes to habitat management, as a result of the proposed development, are likely to see a net gain in biodiversity; this is consistent with local and national planning policies relating to nature conservation.
112. In terms of policy the LDP policy GN1 details the need to protect the natural environment including protected habitats and species whilst Policy GN37 requires wherever possible biodiversity enhancement. Policy GN37 also seeks to protect 'protected species' or their habitats and the integrity of other habitats, sites or features of importance to wildlife and individual species.
113. It is considered that the assessments undertaken have demonstrated that the project will not impact in any significant way on off-site or on-site ecology and will not impact on protected species. Therefore, the project is considered to be fully compliant with the relevant policy.

#### ***3.1.6.3 Cultural Heritage / Historic Environment***

114. In terms of cultural heritage / archaeological designations, ES Volume 1 Chapter 10 presents the results of an Archaeological Desk Based Assessment, a Geophysical Survey, a programme of Trial Trenching and a Settings Impact Assessment (SIA). This is summarised in as an Archaeological Impact Assessment in the document.
115. The assessment work concluded that with proposed mitigation the proposed Solar Park will have no significant impacts on any cultural heritage / archaeological features including listed buildings and their settings. Onsite archaeology would benefit to a minor extent by the cessation of ploughing onsite whilst there would be a short-term minor adverse impact to the Church of St Mary that would be briefly impacted on by construction noise.
116. The LDP addresses cultural heritage / archaeological interests under Policy GN38 asking that projects demonstrate protection or enhancement for the character and integrity of such assets.
117. The assessment has demonstrated there is potential for in situ protection for onsite assets and that off-site receptors will not be impacted on in a significant way satisfying the policy requirements.

118. The project is considered to be fully compliant with the relevant policies.

#### **3.1.6.4 Noise**

119. Solar parks are inherently quite due to their nature, with no moving parts etc. Construction work can create noise however construction works are only undertaken within hours defined by any planning consent and for a relatively short duration.

120. The Noise assessments undertaken for the project and reported in ES Volume 1 Chapter 11 demonstrate that there will be no significant impacts due to noise on any sensitive receptors in the construction or operational phases.

121. The project therefore is considered to satisfy the requirements for noise protection afforded in the LDP by policy GN1.

#### **3.1.6.5 Land, Geology, Hydrology, Hydrogeology and flood risk**

122. An assessment was undertaken as part of the EIA regarding impacts to hydrology, hydrogeology, flood risk and ground conditions. The development was found to have minor to negligible significance reducing to negligible with the implementation of best practice mitigation measures.

123. With specific regard to planning policy the only policy designation which covers the site as noted earlier in this document is GN22. The policy covers extensive areas of the countryside in the county. It is concerned with the extraction of mineral resource and states;

124. *“Where new development is permitted in an area of mineral resource, prior extraction of any economic reserves of the mineral must be achieved, wherever appropriate in terms of economic feasibility and environmental and other planning considerations, prior to the commencement of the development.”*

125. The site is not proposed for any mineral extraction and the installation of panels is temporary and reversible in the longer term. The project is therefore not considered to be contrary to the policy.

126. Regarding flood risk the project was found with suitable mitigation not to give rise to increased risk of flooding on or off site.

127. In terms of the use of the proposed site the reasons for this are set out in detail in the ES Volume 1 Chapter 5: Site Selection and Consideration of Alternatives which included a thorough analysis of alternatives.

128. The project is considered to be fully compliant with the relevant policies.

#### **3.1.6.6 Cumulative Environmental impacts**

129. Wherever relevant the EIA has examined the potential for cumulative environmental impacts. In no cases were there found to be significant impacts that would result from the development or go against the various policies of the LDP.

#### ***3.1.6.7 Residential Amenity***

130. There are many factors that influence residential amenity which is protected by policy GN1 of the LDP. These are discussed where relevant above and more fully in the Environmental Statement.
131. Various studies undertaken as part of the EIA have found no significant potential to impact on local amenity. This includes visual impacts, as well as noise / vibration, and air quality impacts.
132. The project is considered to be fully compliant with the relevant policies.

#### ***3.1.6.8 Traffic and Infrastructure***

133. As part of the development process, WSE has sought to ensure that there is appropriate and safe vehicular access to the proposed Solar Park site. Further information is provided in ES Volume 1 Chapter 13 Traffic and Infrastructure.
134. No detrimental impact to the local highway network is envisaged. The site is close to a main road from which relatively easy access is achieved. The construction phase will be relatively short and will not unduly impact on other road users. In the operational phase visits to and from site will be minimal.

#### ***3.1.6.9 Local opinion***

135. Local opinion can be viewed as a material factor in considering planning applications. As documented in Section 1.2 above our consultation with local residents showed majority support from those who responded to the consultation.

## 4 Summary and Conclusion

136. The proposed Solar Park is compliant with the higher-level requirements of the relevant national planning policy (including the National Policy Statements and the National Planning Policy Framework). Taken together, the objectives and policies within this national planning policy is considered to support and indeed encourage the development of renewable energy projects, such as the proposed Solar Park, where such projects do not have an unacceptable impact on their surrounding environment.
137. Furthermore, the proposed Solar Park is compliant with the requirements of the relevant policies of the Pembrokeshire County Council LDP. These policies relate to (generally) to spatial development and (specifically) to the impact of development on the surrounding environment. The assessment documented in the Environmental Statement and supporting documentation concludes that the proposed Solar Park will have no significant environmental impacts.
138. Therefore, due to the need for the development of renewable energy projects and its clear compatibility with both national and local planning policy, it is considered that the proposed Solar Park is an acceptable proposal.

## **Appendix A: Schedule of Planning Policies & Commentary**

## Appendix A: Schedule of Planning Policies & Commentary

This Appendix provides a schedule of the planning policies identified in Section 3 as being relevant to the project. Plan Policies are reproduced word for word however Plan / Proposals Maps are not reproduced with internet links provided to these are appropriate should readers of this Environmental Statement which to reference them.

### The National Plan 2040

Policy	Content	Comments
<p><b>Policy 8</b></p> <p>Strategic framework for biodiversity enhancement and ecosystem resilience</p>	<p>To ensure the enhancement of biodiversity and the resilience of ecosystems, the Welsh Government and its key partners will identify:</p> <ul style="list-style-type: none"> <li>• areas which could be safeguarded as ecological networks for their potential importance for adaptation to climate change or other pressures, for habitat restoration or creation, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and</li> <li>• opportunities where strategic green infrastructure could be maximised as part of development proposals, requiring the use of nature based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and public well-being.</li> </ul> <p>Planning authorities should include these sites in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, cumulative action towards securing the enhancement of biodiversity and the resilience of ecosystems should be demonstrated as part of</p>	<p>The Ecological Impact Assessment undertaken and reported in the ES provides detailed of the biodiversity / ecological enhancement measures that will be put in place as part of the proposed development. It is envisaged, as part the requirements of the policy that there will be a net overall ecological enhancement of the site.</p>

<b>Policy</b>	<b>Content</b>	<b>Comments</b>
	development proposals through innovative, nature-based approaches to site planning and the design of the built environment.	
<b>Policy 11</b>	<p>Wind and Solar Energy Outside of Priority Areas</p> <p>Areas Outside of the Priority Areas for Solar and Wind, planning applications for large scale wind and solar development must demonstrate the proposal is acceptable, in accordance with the criteria below.</p> <p>Planning applications must demonstrate how local social, economic and environmental benefits have been maximised and that there are no unacceptable adverse effects on, or due to, the following:</p> <ul style="list-style-type: none"> <li>• landscape and visual impacts;</li> <li>• cumulative impacts;</li> <li>• the setting of National Parks and Areas of Outstanding Natural Beauty;</li> <li>• visual dominance, shadow flicker, reflected light or noise impacts;</li> <li>• electromagnetic disturbance to existing communications systems; and</li> <li>• the following identified protected assets:               <ul style="list-style-type: none"> <li>- archaeological, architectural or historic assets;</li> <li>- nature conservation sites and species;</li> <li>- natural resources or reserves.</li> </ul> </li> </ul>	<p>The project site is not located within the areas identified in the document for such projects. A detailed discussion of the reasons for this is included in the Site Alternatives Assessment.</p> <p>It is considered that the various studies that are reported in the Environmental Statement demonstrate that the environmental impacts, if suitably mitigated are acceptable and in some cases represent an environmental benefit to the site.</p>

<b>Policy</b>		<b>Content</b>	<b>Comments</b>
		Suitable access to the site for construction and maintenance purposes must be provided. Plans must also be in place for the end of the development's lifetime, including the removal of all infrastructure as soon as their use ceases and the appropriate after-use of the site.	

### Pembrokeshire LDP

<b>Policy</b>		<b>Content</b>	<b>Comments</b>
<b>SP 1</b>	<b>Sustainable Development</b>	All development proposals must demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised.	<p>As discussed in the main document the project by its very nature represents sustainable development and therefore it is felt the policy strongly supports the proposed development.</p> <p>The project once operational will generate clean, renewable electricity that will be fed into the local grid network reducing the need for generation by more polluting power plant. It will do so whilst inputting electricity to the grid closer to areas of demand therefore reducing transmission losses across the network.</p> <p>More generally the project will help the UK reduce its energy imports and meet its renewable energy and climate change goals.</p> <p>A series of associated environmental benefits have also been identified such as habitat improvements /</p>

<b>Policy</b>		<b>Content</b>	<b>Comments</b>
			<p>biodiversity enhancement measures that will be an added benefit of the development.</p> <p>From an economic perspective it will generate economic activity in the local areas in the construction and to a lesser extent in the operational phases. The project will also pay business rates to the local authority.</p>
<b>SP 11</b>	<b>Waste</b>	<p>Production of waste and its impact on the environment will be minimised and the use of waste as a resource maximised, through re-use, recovery for materials or energy and, where this cannot be achieved, safe disposal, using the best practicable environmental option.</p>	<p>Waste produced will be mostly associated with the construction phase and will be minimal as detailed within ES Volume 1 Chapter 15. Detailed plans will be put in place managing waste and where practical eliminating it. This will be achieved through the implementation of the Construction and Environmental Monitoring Plan (CEMP) (doc ref BL009).</p>
<b>SP 16</b>	<b>The Countryside</b>	<p>The essential requirements of people who live and work in the countryside will be met whilst protecting the landscape and natural and built environment of Pembrokeshire and adjoining areas. Development which minimises visual impact on the landscape and relates to one of the following will be promoted:</p> <ol style="list-style-type: none"> <li>1. Enterprises for which a countryside location is essential;</li> <li>2. Opportunities for rural enterprise workers to be housed in suitable accommodation that supports their employment; and</li> </ol>	<p>Policy SP 16 is somewhat relevant to the project, mostly due to its setting in the countryside. It is felt that the project has demonstrated that the visual impact associated with the project is acceptable when the wider benefits are considered. This is particularly the case when Landscape enhancement / mitigation measures are included.</p> <p>The site alternatives study has shown that a countryside location is necessary to house a project of the scale required to generate 22 MW of renewable energy.</p>

<b>Policy</b>		<b>Content</b>	<b>Comments</b>
		3. The re-use of appropriate existing buildings.	
<b>GN.1</b>	<b>General Development Policy</b>	<p>Development will be permitted where the following criteria are met:</p> <ol style="list-style-type: none"> <li>1. The nature, location, siting and scale of the proposed development is compatible with the capacity and character of the site and the area within which it is located;</li> <li>2. It would not result in a significant detrimental impact on local amenity in terms of visual impact, loss of light or privacy, odours, smoke, fumes, dust, air quality or an increase in noise or vibration levels;</li> <li>3. It would not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park and neighbouring authorities;</li> <li>4. It respects and protects the natural environment including protected habitats and species;</li> <li>5. It would take place in an accessible location, would incorporate sustainable transport and accessibility principles and would not result in a detrimental impact on highway safety</li> </ol>	<p>As per the policy the various points are addressed here in numerical order.</p> <ol style="list-style-type: none"> <li>1. The site selection study has demonstrated the need for the project to be sited in the proposed location. Of relevance to this point is the landscape character impacts of the proposed solar park. The LVIA has examined the capacity of the landscape to house the proposed development and found no significant impacts in EIA terms.</li> <li>2. Various studies undertaken as part of the EIA have found no significant potential to impact on local amenity. This includes visual impacts, as well as noise / vibration, and air quality impacts.</li> <li>3. Impacts to the nearby National Park have been considered in terms of its Landscape Character. Again no significant impacts were identified, largely due to the topography of the area.</li> <li>4. The EclA found that there would be no significant impacts to ecology with the potential for longer term biodiversity enhancements as a result of the scheme.</li> <li>5. No detrimental impact to the local highway network is envisaged. The site is close to a main road from which relatively easy access is achieved. The construction phase</li> </ol>

<b>Policy</b>		<b>Content</b>	<b>Comments</b>
		<p>or in traffic exceeding the capacity of the highway network;</p> <ol style="list-style-type: none"> <li>6. Necessary and appropriate service infrastructure, access and parking can be provided;</li> <li>7. It would not cause or result in unacceptable harm to health and safety;</li> <li>8. It would not have a significant adverse impact on water quality; and</li> <li>9. It would neither contribute to the coalescence of distinct settlements nor create or consolidate ribbon development.</li> </ol>	<p>will be relatively short and will not unduly impact on other road users. In the operational phase visits to and from site will be minimal.</p> <ol style="list-style-type: none"> <li>6. All necessary infrastructure would be on site with no impacts away from the proposed development.</li> <li>7. There are no parts of the project that would pose an unacceptable risk to health and safety. Full H&amp;S measures will be adopted onsite during the construction and operational phases.</li> <li>8. There will be no impacts to water quality.</li> <li>9. The development would not result in coalescence of settlements.</li> </ol>
<b>GN.2</b>	<b>Sustainable Design</b>	<p>Development will be permitted where relevant criteria are met:</p> <ol style="list-style-type: none"> <li>1. It is of a good design which pays due regard to local distinctiveness and contributes positively to the local context;</li> <li>2. It is appropriate to the local character and landscape/townscape context in terms of layout, scale, form, siting, massing, height, density, mix, detailing, use of materials, landscaping and access arrangements / layout;</li> </ol>	<p>As per the policy the various points are addressed here in numerical order.</p> <ol style="list-style-type: none"> <li>1. The design of the park has gone through a series of iterations to ensure that its impact is reduced to the extent possible. Features are included to enhance onsite landscaping.</li> <li>2. The site selection study has demonstrated the need for the project to be sited in the proposed location. Of relevance to this point is the landscape character impacts of the proposed solar park. The LVIA has examined the capacity of the landscape to</li> </ol>

<b>Policy</b>		<b>Content</b>	<b>Comments</b>
		<ol style="list-style-type: none"> <li>3. It incorporates a resource efficient and climate responsive design through location, orientation, density, layout, land use, materials, water conservation and the use of sustainable drainage systems and waste management solutions;</li> <li>4. It achieves a flexible and adaptable design;</li> <li>5. It creates an inclusive and accessible environment for users that addresses community safety;</li> <li>6. It provides a good quality, vibrant public realm that integrates well with adjoining streets and spaces and</li> <li>7. It contributes to delivering well designed outdoor space with good linkages to adjoining streets, spaces and other green infrastructure.</li> </ol>	<p>house the proposed development and found no significant impacts in EIA terms</p> <ol style="list-style-type: none"> <li>3. By its nature the solar park is climate responsive. Sustainable drainage and other such features are included in the design also.</li> <li>4. The project complies with bullet point 4 to the extent that it is relevant.</li> <li>5. Part 5 is of limited relevance to the development.</li> <li>6. Part 6 is of limited relevance to the development.</li> <li>7. Part 7 is of limited relevance to the development.</li> </ol>
<b>GN.3</b>	Infrastructure and New Development	<p>Where development generates a directly related need for new or improved infrastructure, services or community facilities and this is not already programmed by a service or infrastructure company, then this must be funded by the development, and:</p> <ol style="list-style-type: none"> <li>1. Related in scale and kind to the development; and</li> </ol>	<p>Whilst the title of the policy suggests that it would be relevant given the project represents “Infrastructure and New Development” it is not considered that any of the specific content reflects the nature of a solar park. As such no further commentary is provided.</p>

<b>Policy</b>	<b>Content</b>	<b>Comments</b>
	<p>2. Provided on site wherever appropriate. In exceptional circumstances contributions may be made to the provision of facilities elsewhere, provided their location can adequately service the development. The timely provision of directly related infrastructure, services and community facilities shall be secured by planning condition(s), the seeking of planning obligation(s) by negotiation, and/or by any other agreement or undertaking.</p> <p>The viability of a development will be a key consideration when securing planning obligations and dispensation may be allowed where these requirements cannot be supported by land values.</p> <p>Measures necessary to physically deliver a development and ensure that it is acceptable in planning terms will be required in the first instance. Where appropriate contributions may be sought for a range of purposes, including:</p> <ol style="list-style-type: none"> <li>1. Affordable housing</li> <li>2. Recreational and Amenity Open Space</li> <li>3. Sustainable Transport Facilities</li> <li>4. Education</li> <li>5. Community Facilities, including libraries,</li> <li>6. Regeneration</li> </ol>	

<b>Policy</b>		<b>Content</b>	<b>Comments</b>
		<p>7. Waste</p> <p>8. Renewable and low carbon energy</p> <p>9. Biodiversity</p> <p>In the event that viability considerations indicate that not all the identified contributions can reasonably be required, priority contributions will be determined on the basis of the individual circumstances of each case. In the case of housing developments, priority will be given to affordable housing unless there is an overwhelming need for the available contribution, in whole or in part, to be allocated for some other appropriate purpose/s.</p>	
<b>GN.4</b>	Resource Efficiency and Renewable and Low-carbon Energy Proposals	Development proposals should seek to minimise resource demand, improve resource efficiency and seek power generated from renewable resources, where appropriate. They will be expected to be well designed in terms of energy use. Developments which enable the supply of renewable energy through environmentally acceptable solutions will be supported.	The project is supported by the policy which seeks to promote power being generated from renewable energy sources.
<b>GN.10</b>	Farm Diversification	<p>Diversifying the range of economic activities on a farm will be permitted where the following criteria are met:</p> <p>1. The proposed use helps to support the continued agricultural operation of the farm;</p>	<p>The policy has some relevance to the proposed development. The solar park will help the financial sustainability of ongoing farming at the site.</p> <p>Farmland will not be lost to production but will switch to livestock (sheep) farming which will take place between the panels.</p>

<b>Policy</b>		<b>Content</b>	<b>Comments</b>
		<p>2. If a new building is justified it should be sited in or adjacent to an existing group of buildings; and</p> <p>3. If a retail use is proposed the scale and scope will not harm the vitality and viability of retail facilities in any nearby settlements, or undermine the retail hierarchy.</p>	After the operational lifetime of the solar park is over the land will fully return to farmland.
<b>GN.22</b>	Prior Extraction of the Mineral Resource	Where new development is permitted in an area of mineral resource, prior extraction of any economic reserves of the mineral must be achieved, wherever appropriate in terms of economic feasibility and environmental and other planning considerations, prior to the commencement of the development.	The site is not proposed for any mineral extraction and the installation of panels is temporary and reversible in the longer term. The project is therefore not considered to be contrary to the policy.
<b>GN.37</b>	Protection and Enhancement of Biodiversity	All development should demonstrate a positive approach to maintaining and, wherever possible, enhancing biodiversity. Development that would disturb or otherwise harm protected species or their habitats, or the integrity of other habitats, sites or features of importance to wildlife and individual species, will only be permitted in exceptional circumstances where the effects are minimised or mitigated through careful design, work scheduling or other appropriate measures.	The Ecological Impact Assessment undertaken and reported in the ES provides detailed of the biodiversity / ecological enhancement measures that will be put in place as part of the proposed development. It is envisaged, as part the requirements of the policy that there will be a net overall ecological enhancement of the site.
<b>GN.38</b>	Protection and Enhancement	Development that affects sites and landscapes of architectural and/or historical merit or archaeological importance, or their setting, will	A series of studies have been undertaken to ascertain the potential for the project to impact on the historic environment. The studies found that

<b>Policy</b>		<b>Content</b>	<b>Comments</b>
	of the Historic Environment	only be permitted where it can be demonstrated that it would protect or enhance their character and integrity.	there would be no significant impact to such interests. The project therefore is considered to comply with the policy.

