



**Town and Country
Planning Act 1990**

**The Developments of
National Significance
(Wales) Regulations
2016**

Application by
Wessex Solar Energy

Land at Blackberry
Lane, Nash,
Pembrokeshire

Local Impact Report

Pembrokeshire County
Council

29th March 2021

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<https://www.pembrokeshire.gov.uk/adopted-local-development-plan/ldp-supplementary-planning-guidance>

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<https://www.pembrokeshire.gov.uk/adopted-local-development-plan/landscape-character-assessment>

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Glossary

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| AAI | Area of Archaeological Interest |
| CEMP | Construction Environmental Management Plan |
| CTMP | Construction Traffic Management Plan |
| DNS | Development of National Significance |
| DAS | Design and Access Statement |
| EIA | Environmental Impact Assessment |
| ES | Environmental Statement |
| HSE | Health & Safety Executive |
| LDP | Local Development Plan for Pembrokeshire (Adopted 28th February 2013) |
| LIR | Local Impact Report |
| LVIA | Landscape and Visual Impact Assessment |
| PCC | Pembrokeshire County Council |
| PCNPA | Pembrokeshire Coast National Park Authority |
| PINS | The Planning Inspectorate |
| SAB | Sustainable Drainage Systems Approving Body |
| SAC | Special Area of Conservation |
| SPA | Special Protection Area |
| SSSI | Site of Special Scientific Interest |
| The Proposal | Installation of 22 MW solar park with associated infrastructure |
| The Regulations | Town and Country Planning, Wales - The Developments of National Significance (Wales) Regulations 2016 |
| The Order | Town and Country Planning, Wales - The Developments of National Significance (Procedure) (Wales) Order 2016 |

1. Introduction

- 1.1 In accordance with The Order, this LIR includes an analysis of likely impacts and an assessment of how these relate to local planning policies, a description of the planning history of the site, the identification of local designations, and recommendations for planning conditions (and, if considered necessary, planning obligations).

- 1.2 In accordance with guidance issued by PINS, the LIR has not examined the relationship with national policy and guidance but instead is focussed specifically on establishing the degree of local impact in relation to what are considered to be the principal planning issues, having regard also to the local planning policy context. For each relevant topic, in accordance with guidance, impacts have been expressed in terms of whether they are positive, neutral or negative; with the degree of impact, where relevant, being expressed as major, moderate or minor. However, in accordance with PINS guidance, the LIR does not contain a balancing exercise between positives and negatives, nor does it come to a conclusion on the relative merits of the development itself.

- 1.3 The Proposal was subject to pre-application engagement with PCC. A copy of the pre-application response provided by PCC is included as Appendix A1.

2. Summary

2.1 The main local effects of the Proposal, subject to the proposed mitigation and control described in the application and in this LIR, can be summarised as:

- neutral in respect of nature conservation effects
- minor negative (construction & decommissioning phases) and neutral (operational phase) in respect of transportation effects
- minor negative in respect of historic environment effects
- minor negative in respect of landscape character effects and minor negative in respect of visual amenity effects
- minor positive in respect of socio-economic effects.

2.2 The Proposal would accord with the LDP when read as a whole and its strategic policies and objectives, and policies GN.1 (General Development Policy), GN.2 (Sustainable Design), GN.4 (Resource Efficiency and Renewable and Low-Carbon Energy Proposals), GN.37 (Protection and Enhancement of Biodiversity) and GN.38 (Protection and Enhancement of the Historic Environment) other than in the following respects:

- Due to the minor negative effect on the historic environment in respect of the Grade II listed Church of St Mary as described in this report, the Proposal is not technically compliant with policy GN.38 because this policy is not tolerant of harm to an historic asset even when such harm is limited as in this case.
- Whilst the Proposal would not result in a significant detrimental impact on visual amenities (criterion 2 of policy GN.1), the Proposal would result in a minor adverse effect on the landscape (criterion 3 of policy GN.1)
- Subject to the proposed mitigation and recommended planning conditions, the Proposal is unlikely to result in a detrimental highway impact (criterion 5 of policy GN.5) albeit a minor negative impact cannot be entirely discounted during the construction phase.

Whilst the ES addresses other topics not considered in this LIR, none of these are considered likely to give rise to adverse effects subject to the embedded mitigation within the application and the planning conditions that are recommended.

3. Proposed Development

- 3.1 The Proposal comprises the installation of a 22MW solar park with associated infrastructure. The Proposal would comprise up to 70,000 PV panels, up to 12 inverter/transformer cabins (10.4 m (length) x 2.6 m (width) x 3.18 m (height)) and a control building (7m (length) x 3m (width) x 4m (height)). The PV panels would be “of the order of 2210 mm (l) x 1130mm (w)”. The panels would be positioned at an angle of up to 22° and would have a height of no more than 3.5 m from the ground to the top of the panel.
- 3.2 It is noted that the application states that the final size of PV panels and the number of inverters are subject to confirmation and that “for the purposes of this planning application we have endeavoured to quote an upper limit in terms of dimensions and land take, so that the impacts of the final design ... would be less than that detailed in this application. We believe that this makes the ES a ‘worst-case’ assessment of the potential impacts of the development” (DAS).
- 3.3 A network of cables would connect the transformers to a set of switchgear housed in the control building on site. From the control building electricity would be exported to the grid via an underground cable to the existing Golden Hill substation located approximately 2.3 km to the south west. It is noted that the off-site grid connection works do not form part of the DNS application but has been considered as part of the EIA.
- 3.4 Site access would be along the A477(T), 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. An on-site track linking the site access point to the fields and electrical buildings is proposed of total length approximately 1.75km, to be constructed from compacted stone or aggregate. A permanent 2.5m high security fence would be installed (behind any existing hedgerows) with a gate at the point of access. CCTV

cameras would surround the site on the inside of the hedgerows albeit the number is not confirmed.

- 3.5 The application describes the plans submitted of the control building, cabins, security fence and access track as “indicative” only.
- 3.6 During the construction phase a temporary site compound / laydown area would be provided of approximately 1600 sq.m., to include an area of hard-standing / gravel to house a temporary office and welfare facility. This compound would also be used for the parking of staff vehicles and the storage of construction equipment / vehicles / materials. An additional HGV turning area would also be incorporated.
- 3.7 The Solar Park would have an operational lifetime of 40 years after which it would be decommissioned and all above and below ground aspects of the development removed from site.

4. Publicity

- 4.1 By correspondence dated 24th February 2021, PINS required the site notices (copies of which were included with that letter) to be erected in at least one place on or near the land to which the application relates “as a matter of urgency” for a period of not less than 30 days. Site notices were erected at three locations on 26th February 2021. The site notices remained for at least 30 days. Therefore, the LPA submits that they have complied with Regulation 19 of The Order.
- 4.2 Appendix A2 includes a copy of the site notice, a plan indicating the location of the site notices and photographs of the site notices at each location. Therefore, the LPA submits that they have complied with Regulation 25 (2) (c) of The Order.
- 4.3 The LPA can also confirm that the documents required to be placed on the planning register, and described in PINS validation letter dated 24th February 2021, were placed on the planning register within the required 5 working days. Therefore, the LPA submits that they have complied with Regulation 20 of The Order.

5. Site & Surroundings

- 5.1 The proposed site comprises 8 fields of arable land covering a total area of approximately 34.25 hectares. The site is relatively level for the most part but has a north-south slope which is more exaggerated in the northern part of the site. The site varies from approximately 35m Above Ordnance Datum (AOD) to approximately 20m AOD. Within a wider context, the site is located within an area of open rural landscape but with the village of Cosheston to the north west (0.7km) and the town of Pembroke Dock to the south-west (2.5km). The A477(T) is to the south.
- 5.2 The site is not located within any internationally, European or nationally designated ecological sites. The closest are the Pembrokeshire Marine SAC approximately 1km to the west at its nearest point and the Milford Haven Waterway SSSI approximately 650m to the north east at its nearest point.
- 5.3 The boundary with the Pembrokeshire Coast National Park is approximately 120m to the north of the site.
- 5.4 In respect of heritage assets, the site contains no designated assets. However, the presence of possible prehistoric features considered to be of potential regional importance have been identified. The Milford Haven Waterway Landscape of Outstanding Historic Interest (published by Cadw) is situated approximately 200m to the north at its closest point. The nearest listed building is the Grade II listed Church of St Mary at Nash located approximately 270m to the west. There is a Registered Park / Garden located approximately 510m to the north east of the site. There are no SAMs within the site; the closest is approximately 1.5 km to the south.

5.5 There are a small number of scattered houses in the vicinity of the site the closest of which is Nash Villa (approximately 130m to the south-west). There are no public footpaths or bridleways crossing the site. The nearest footpath runs along the western boundary which is also a bridleway (refer to public rights of way plan at Appendix A3).

6. Planning History

- 6.1 There is no planning history in terms of relevant planning applications relating to the site.
- 6.2 There are two solar parks and a wind turbine nearby:

Solar Parks

- Immediately to the north-west of Cosheston, approximately 1.2km north-west of the Site, granted planning permission on 28th November 2012 under LPA Ref.12/0050/PA.
- Approximately 1.8km to the south-west of the Site, on 10th September 2014, under LPA Ref.14/0129/PA.

Wind Turbine

- A 42 metre tall wind turbine approximately 2.8km to the south-east, granted planning permission on 23rd May 2014 under LPA Ref. 13/0771/PA.

Copies of these planning permissions, committee reports and site location plans are included as Appendix A4.

7. Local Planning Policy

- 7.1 The LDP was adopted on 28th February 2013 and is the Development Plan for the area of Pembrokeshire that is outside of the Pembrokeshire Coast National Park (Appendix A1). There are a number of policies in the LDP that are relevant in the consideration of the application. Paragraph 1.19 of the LDP records that 'many of the Plan policies are inter-related and several may relate to any individual development proposal. It is therefore important that the Plan is read as a whole and used in conjunction with national policy and guidance and local SPG'.
- 7.2 The LDP Strategy is designed to deliver the Vision for Pembrokeshire, meet the objectives of the LDP and respond to the issues identified to deliver sustainable development. The strategy focuses on enabling development in accordance with the identified objectives. The Strategy is implemented through development(s) that comply with 16 strategic policies; these are then supported by a number of general policies (and allocations). The strategic policies that are of most relevance to the appeal are described below.
- 7.3 The LDP recognises that the County has significant potential to provide energy from renewable sources and aims to encourage further use of renewables to produce energy in order to contribute to meeting government targets. Policies SP 1 (Sustainable Development) and SP 16 (The Countryside) both aim to ensure that sustainable development is achieved whilst protecting the landscape, and natural and built environment of Pembrokeshire and adjoining areas.
- 7.4 In terms of the vision and objectives of the LDP, PINS is referred to Chapter 4 of the LDP. Chapter 5 presents the Plan Strategy and includes 16 strategic policies. The Strategy is designed to deliver the Vision for Pembrokeshire, meet the objectives of the LDP and respond to the issues identified to deliver sustainable development. It was derived from national and regional policy principles (albeit now superseded by Future Wales –

the National Plan 2040 and Planning Policy Wales (Edition 11)) and an evaluation of economic, social and environmental factors and the key issues and characteristics that make Pembrokeshire unique.

- 7.5 Policy SP 1 is an overarching strategic policy which requires all development to demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised. The main strategic drivers in relation to the development subject to this application are the obligations and national planning policy relating to the need for a greater proportion of energy production to be delivered from renewable sources. Delivering such development has wider social and economic advantages. The potential for positive social and economic effects (that accord with SP 1) are addressed elsewhere in the LIR, as are the potential environmental impacts. The Proposal would be consistent with the objectives of policy SP 1.
- 7.6 Policy SP 16 seeks to protect the landscape and natural and built environment of Pembrokeshire and adjoining areas. The text to the policy recognises that “Pembrokeshire and its wider context, has a range of important environments and landscapes” and has an outstanding natural and historic environment. It further recognises that “there are many challenges in maintaining a strong natural and historic environment whilst ensuring that other key objectives in the Plan such as providing housing or building on the County’s strategic location for energy and port related development are met”.

General Policies

- 7.7 Chapter 6 of the LDP sets out detailed policies. Of most relevance to this application are policies GN.1 (General Development Policy), GN.2 (Sustainable Design), GN.4 (Resource Efficiency and Renewable and Low-Carbon Energy Proposals), GN.22 (Prior Extraction of the Mineral Resource), GN.37 (Protection and Enhancement of Biodiversity) and GN.38 (Protection and Enhancement of the Historic Environment).

- 7.8 Policy GN.1 provides a framework for the evaluation of potential development impacts. In respect of visual and landscape effects, policy GN.1 states that development will be permitted where 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; and it would not adversely affect landscape character, quality or diversity; including the special qualities of the PCNP.
- 7.9 Policy GN.2 (Sustainable Design), amongst other matters, requires development to be “of a good design which pays due regard to local distinctiveness and contributes positively to the local context”, is “appropriate to the local character and landscape/townscape context”, incorporates a resource efficient, climate responsive, flexible and adaptable design.
- 7.10 Policy GN.4 supports development which enables the supply of renewable energy through environmentally acceptable solutions. The development would clearly enable the supply of a greater proportion of renewable energy that is explicitly supported by reason of policy GN.4 but, in order to be acceptable, this must be achieved by “environmentally acceptable solutions”.
- 7.11 In combination, policies GN.1, GN.2 and GN.4 support renewable energy developments through environmentally acceptable solutions. These policies should be accorded equal weight. Assessment against policies GN.1 and GN.2 needs to be weighed against establishing whether the scheme is ‘environmentally acceptable’ for the purposes of policy GN.4 that ‘aims to encourage further use of renewables’. The accompanying text to Policy GN.4 states that landscape impact, individually and cumulatively, will clearly be a material consideration in the evaluation of renewable energy proposals. Establishing the level of impact including direct visual effects and impact on landscape character & specific designations is therefore critical.

- 7.12 Policy GN.3 (Infrastructure and New Development) provides a framework for securing necessary infrastructure improvements that are generated by new development. This policy relates to planning obligations normally to be secured by legal agreement. No Section 106 legal agreement is being recommended by PCC.
- 7.13 The Site is situated within an area of mineral resource and policy GN.22 requires the prior extraction of any economic reserves wherever appropriate in terms of economic feasibility and environmental and other planning considerations.
- 7.14 Policy GN.37 requires development to demonstrate a positive approach to maintaining (and, wherever possible, enhancing) biodiversity; “development that would disturb or otherwise harm protected species or their habitats ... will only be permitted in exceptional circumstances where the effects are minimised or mitigated through careful design, work scheduling or other appropriate measures”.
- 7.15 Policy GN.38 (Protection and Enhancement of the Historic Environment) requires that any development that affects sites and landscapes of architectural and/or historical merit or archaeological importance, or their setting, will only be permitted if their character and integrity is protected or enhanced. Considered further in the detailed assessment that follows.
- 7.16 Relevant extracts of the LDP are included as Appendix A5.

Supplementary Planning Guidance

7.17 The following adopted LDP SPG is relevant as well as the emerging Landscape Character Area Assessment (Consultation Draft) (included as Appendix A6):

- Renewable Energy SPG (October 2016)
- Biodiversity SPG (May 2014)

Replacement Local Development Plan

7.18 PCC is currently reviewing its LDP. The new Plan, LDP2, reached the Deposit stage in 2020 with a full draft made available for public consultation that ran from 15 January 2020 to 18 March 2020. In response to the current Covid-19 pandemic and associated Welsh Government guidance, PCC has prepared a Covid-19 Impact Assessment (October 2020), is reviewing some parts of the evidence base for the new Plan and has published an amended Delivery Agreement (which was approved by PCC on 8th October 2020 and by Welsh Government on 30th October 2020. The new Delivery Agreement for LDP 2 anticipates:

- Publication of Focussed Changes in March / April 2021
- Submission to Welsh Government by July 2021
- Examination during winter 2021
- Publication of the Inspector's Report in spring / summer 2022
- Adoption in summer 2022

The above dates are indicative and there may be further delays resulting from the ongoing impacts of Covid-19 and the need to address other emerging issues. The current LDP will remain in force until LDP2 is adopted.

8. Transportation

- 8.1 The highway access to the Site is via the A477 (T) and along a minor county road, Nash Lane. Nash Lane is a single track no through lane of basic construction, the proposal will use around 200m of this lane to access the existing field gate. Table 13-3 of the ES indicates a summary of deliveries indicating 631 deliveries (equating to 1,262 2-way trips), Table 13-4 provides an indicative programme of deliveries.
- 8.2 As can be seen from Table 13-3 it is estimated that 631 mainly HGV deliveries will use the lane over a four month construction period. Table 13-4 indicates that 417 of these will occur in the first month. Whilst it could be considered that 417 HGV (834 2-way trips) could be accommodated in capacity terms over a four week period, 258 of these are aggregate and 111 are concrete deliveries which will be in the main related to site establishment and are likely to come in over a very intense and short period. Whilst it is stated that trucks bringing deliveries of aggregate to site are likely to be spread throughout the working day and are not expected to impact significantly on local traffic levels, in reality the rate is likely to be intense periods of delivery, which is likely to lead to conflict of delivery vehicle movements and potentially leading to reversing movements, including potentially onto the trunk road.
- 8.3 Furthermore, whilst the ES states that the lane experiences current use by large agricultural vehicles, these would be infrequent and would not have the same loading impact on the existing lane structure. The lane is constructed to a basic level and is not designed for the loading which will be placed on it by this development.
- 8.4 Without suitable mitigation therefore, during the construction period, the access lacks the necessary capacity and would result in a detrimental impact on highway safety thus conflicting with policy GN.1. The required mitigation is that the lane should be widened to 5.5m from its junction with the A477 (T) in total, or in agreed sections, for approximately 200m to the

entrance to the proposed Solar Park. Also the carriageway shall be reconstructed to a level suitable for the loading proposed by this development.

- 8.5 The ES includes reference to the provision of a CTMP which can be found appended. The purpose of the CTMP is to minimise the impact of construction activities through successful implementation of a CEMP. Whilst the CTMP is both welcomed and essential and is measured in its approach, it is considered that the existing standard of the lane is not suitable in either capacity or structural terms and as such the lane should be upgraded in both capacity and structural terms as outlined above.
- 8.6 It is proposed that deliveries will be marshalled to the site as appropriate to ensure that there are no conflicts on the lane accessing the site. There is a passing place for commercial vehicles use at the bottom end of the lane on first entrance from the A477(T) where vehicles can safely wait off the A477(T) if other vehicles are on the lane travelling towards the A477(T). In addition, there is a westbound layby along the A477(T) to the west of the A4075 junction (approximately half way between the A4075, and the access lane) that can also accommodate any waiting commercial vehicles, which would then be marshalled to the site.
- 8.7 With the required mitigation to be assured by planning conditions, the Proposal is unlikely to result in a detrimental highway impact (criterion 5 of policy GN.5) albeit a minor negative impact cannot be entirely discounted during the construction phase.

9.0 Visual & Landscape

- 9.1 Chapter 8 of the ES considers landscape and visual effects and includes an LVIA. PCC consider that the LVIA has been undertaken in a thorough manner with the methodology described in detail.
- 9.2 A block of a mature deciduous woodland divides the northern boundary, and the hedgerows locally are typically well vegetated with frequent mature trees. The Site is located on a valley floor within gently undulating pastoral landscape, with a low ridge running east-west 1km to south with gentle hills 0.5km to the north. The settlement pattern is locally of small scale rural settlements and isolated farm dwellings set within a mosaic of mixed arable and grazing land defined by fields, hedgerows and blocks of woodland.
- 9.3 The Site is between the village of Cosheston and Milton which lies 1.5km to the east within a road structure where the A477(T) runs east/west at 140m south of the site, the minor road 'Blackberry Lane' forming the eastern boundary and the minor road between Cosheston and Milton lying at its closest 100m to the north. The latter road marks the boundary of the National Park which extends northwards for 10 miles and has in this part the Cleddau river system as its focus.
- 9.4 A minor road runs across the south west corner from the A477(T) to St Mary's Church, touching the south west corner of the site from which access is proposed. A public footpath runs from Nash Church to alongside the western boundary for one field before continuing northwards to the minor road. The larger towns of Pembroke Dock and Pembroke lie to the west and south-west respectively.
- 9.5 The surrounding landscape forms part of the Hundleton and Lamphey Landscape Character Area as defined by the PCC (Consultation Draft) SPG (included as Appendix A5), which is based on Wales-wide LANDMAP system but provides a finer-grain description. Other Landscape Character Areas lie from 1km away and further, and are shown on Figure 8.4 of the ES. As well as being close to the northern edge of the site the PCNP also

lies at 2.5km to the south east which orientates itself from the ridgeline southwards towards the coast. The site therefore lies sandwiched between two areas of high quality landscape although it does not address either with only a small part of the slope within the National Park to the north being part of the same landscape element. Pylons are a feature of the surrounding landscape both on the ridge line to the south, valley floor to the east and more distantly beyond the rising ground to the north-west.

- 9.6 The ES methodology has been well prepared and thoroughly approached using the standards expected in the industry, of particular relevance being compliance with GLVIA3. The methodology has been articulately written to make understanding and appreciation of the process clear and has been broken down into separate sections to expand the various aspects being considered, and this is expanded into Appendix 8.2 of the ES to describe the Visual Aids that have been employed in the LVIA and again conforming to industry standards. The methodology adopted defines only moderate/major or major significance as being 'significant effects' in terms of the likely impacts of the development as referred to in the EIA Regulations, and professional judgement has been employed to either raise or lower assessments into the appropriate category when considered to be borderline.
- 9.7 Appendix 8.3 of the ES focuses on landscape sensitivity and focuses on the multiple values identified in PCC's (Consultation Draft) Landscape Character Area Assessment within which the Site occurs – LCA25 Hundleton and Lamphey - and gives a reasonable judgement of susceptibility of the landscape feature in relation to the site and its proposed development. The overall judgement of sensitivity is medium which is considered to be fair.
- 9.8 Appendix 8.4 of the ES describes Viewpoint Analysis in terms of both methodology and analysis of each VP in table form, providing descriptions of the existing view, and then the predicted view and scale of visual change, change to landscape character, change to any designated area and cumulative effects. This combines with Table 8-5 in Volume 1 of the ES and

although assessed across both documents they have not had significance of impact applied to them.

- 9.9 Appendix 8.5 of the ES describes Residential Visual Amenity Assessment (RVAA), commencing with the methodology. Within this the applicant has mistakenly utilised a previous document and references to the felling of forestry, and distances to “. . . the nearest turbine” have slipped through. Six properties have been identified for consideration, two of which have been assessed as having moderate/slight magnitude of effect and moderate significance; these are Green Plains at 110m W and Paskeston Lodge at 220m NE of the site. These assessments seem reasonable.
- 9.10 The field shape and orientation is such that the favourable east-west orientation of the panels fits neatly within the existing hedgerow structure in an efficient manner with relatively little space at ends of rows. In three central fields areas have been left without panels to protect archaeological interest below ground. The existing hedgerow structure provides a strong landscape framework within which the panels are disposed, and although the height and density of hedges varies the intention is to allow them to grow and be maintained at 4m height. As such the arrangement produces a relatively ‘dense’ development of continuous strips of panels within the field pattern. To alleviate some of the visual uniformity across three of the central / eastern fields, new hedgerows have been proposed dividing each in half.
- 9.11 The existing hedgerows and blocks of woodland provide an immediate landscape structure helping screen the development from the outset, and new hedge planting within the fields, along with proposed hedgerow growth will enhance the screening and visual break-up effect. Additional tree planting is proposed along the northern boundary of the eastern half to aid screening from PCNP. The additional planting to the northern perimeter is seen as a permanent improvement to the landscape fabric although the additional planting to the interior would be removed on decommissioning. It is considered that this additional planting will serve to soften the negative effect of the proposal rather than provide a complete screen. A planning

condition is recommended to secure existing and proposed landscaping including hedgerows.

9.12 Construction is estimated to take four months and during this time a site compound area of 1600sq.m. will be formed near the entrance where a series of small scale low temporary buildings will be erected. The landscape and visual effects associated with this stage were not evident in the ES but the area of hardstanding is to be retained once operational for maintenance purposes; the temporary buildings will be removed and the control building and two inverters will be located there. It is anticipated that the visual impact is likely to be little different from when fully operational.

9.13 Although the site is relatively low lying and flat there are relatively few properties or vantage points that overlook it. In addition, the surrounding landscape hosts many hedges and trees that provide frequent interruption to direct views into the site. Views are afforded from more distant locations from rising ground to the north and south, and the effects on views in the ES have been summarised as follows:

- Large scale effects where seen from limited locations close-up and from the boundary of the National Park
- Medium and Medium/Small scale visual effects from distances >0.2 – 1.5km to the south in limited locations, beyond which effects would reduce to small or negligible
- Views from all roads would be screened by hedgerows

9.14 PCC (Consultation Draft) character area LCA 25 Hundleton and Lamphey is assessed as being medium/low sensitivity, somewhat influenced by the presence of the existing solar park at Golden Hill 2km south west of the site. A large scale of change would result to the Site itself but owing to the limited views in, a moderate magnitude of effect would arise on the surrounding landscape resulting in a moderate to moderate minor adverse

level of effect and therefore not significant. Effects would be long term and reversible.

- 9.15 PCNP landscape character area LCA 28 Daugleddau is extensive and describes the estuarine environment and associated riparian areas that predominantly face away from the site, with only the southern edge of the LCA being affected by the proposal. A Medium/High sensitivity would be subject to a Slight magnitude of change resulting in a Moderate to Moderate/Minor adverse effect (not significant).
- 9.16 Some visual effect will be perceived from the minor road and footpath to the north of the site, the public footpath west of the site, footpaths and residents at Mayeston and Cosheston and users of the minor roads and footpaths and scattered residents at Upper Nash to up to 1.2km south of the site. Effects are strongly filtered or screened at closer distances by existing vegetation and the beneficial effect of proposed mitigation planting. Rising ground towards the north side of the Site increases its visibility but the Site only becomes more visible from more distant viewpoints to the south. From these viewpoints the Magnitude of effect would be no more than Moderate / Slight on the High / Medium sensitivity receptors; the overall significance would be no more than Moderate and therefore not significant.
- 9.17 The two key routes close to the site, the A477(T) and the A4075 running from Pembroke to join it in a SW/NE orientation are at low elevation and bordered by high hedges with only limited opportunity to see towards the site where only panels on the higher ground in the north-east area would be visible. The users are considered to be of Medium/Low sensitivity and the effects to have a Slight magnitude of change resulting in a Minor significance of effect, i.e. not significant.
- 9.18 The special qualities of the particular Landscape Character Area of the National Park have been analysed to assess potential impacts. There is possibly going to be a Medium scale, limited extent effect on the 'Diversity of Landscape', and Small scale, limited extent on the 'Remoteness, tranquillity and wildness' of the landscape. The 10 other special qualities

listed are considered to be affected to only a Negligible degree. The National Park is considered to be High/Medium sensitivity to a development outside of its boundaries, and these effects would be of Slight magnitude deriving a Moderate/minor significance of effect, i.e. not significant. PINS are in receipt of the representation by the PCNPA dated 18th March 2021 in which it concludes no objection “subject to the securing of appropriate landscape mitigation as part of any approval”.

9.19 The principal developments like to give rise to cumulative effects are the two solar farms to the west and south west, and 42m tall wind turbine located 2.6km to the south east. Basing judgement on the ZTV the ES describes many potential instances where parts of two solar parks may be intervisible from single viewpoints but acknowledges that these effects are likely to be minimised by existing trees, hedges and buildings. Longer views of the wind turbine are possible from higher ground to the north east although views into the site are likely to be limited. There are no strong associations with other similar developments and the strongest association of similar context will be provided by the pylons, particularly to the south. Sequential cumulative effects are most likely from within the National Park on the footpath to the north close to VP 7 but it is considered unlikely owing to the limited glimpses and the effects of intervening vegetation.

9.20 With regard to policy GN.1, of the relevant criteria relating to visual and landscape effects, the Proposal is compatible with the site and area; it would not have a significant detrimental impact on local amenity in terms of visual impact (albeit there would be a minor negative effect on visual amenity) and it would only have a minor negative effect on landscape character, quality or diversity including the National Park. There would thus be a limited conflict with policy GN.1. The Proposal would comply with policy GN.2.

10. Nature Conservation

10.1 Much of the site is made up of species poor improved grassland and it is not anticipated that there would be a loss of any high value ecological habitats. The submitted ecological management scheme is welcomed and should result in an overall biodiversity enhancement for the site. Subject to the following caveats, the Proposal would not result in unacceptable impact and would accord with policies GN.1 and GN.37 as well as the Biodiversity SPG.

- Badgers – pre-commencement checks for badger setts have been proposed. Any works within 30m of an active sett will require a licence from NRW. Therefore, the pre commencement checks should include anything within 30m of any works.
- Bats – NRW’s response at pre-application did not anticipate significant impacts upon the Pembrokeshire Bat Sites and Bosherton Lakes Special Area of Conservation. The ES has concluded that the only foraging and commuting habitats are associated with the tree lines and hedgerows on and adjacent the development site. However, there doesn’t appear to have been any consideration for impacts that the presence of the solar panels themselves will have in terms of collision risk. No trees are proposed for removal as part of the proposed development, however should any trees require works or felling at any time these should be subject to a bat survey to assess the potential for bat roosting.
- Tree and hedgerow buffer – to provide further confidence in the maintenance of the Root Protection Area for trees and ensure the hedgerow is adequately buffered, it is recommended that the 5m buffer starts from the edge of the hedgerow and woodland habitats rather than the centre.
- Lighting – As stated in the ES there must be no external lighting during the construction, operation or decommissioning of the Proposal.

- CEMP – works must be undertaken in accordance with the CEMP with particular attention being paid to protection of the existing wet drainage ditches on site to ensure there are no impacts upon the Pembrokeshire Marine SAC. Included in the CEMP should be a note on checking for areas of silty run-off during construction and decommissioning during periods of heavy rainfall.
- Mitigation and Enhancement – All works must be undertaken in accordance with Section 9.6 of the submitted ES, Section 2.3 of the Ecological Mitigation and Management Plan and the Landscape Management Plan. The proposed enhancements are also likely to result in habitat improvements for several species. The addition of hibernacula opportunities as part of the enhancement scheme would be welcomed.

10.2 It has been recommended for previous Solar Farm applications that the applicants make contact with the Islands Conservation Advisory Committee (ICAC) of the Wildlife Trust of South and West Wales regarding opportunities to monitor solar park sites for disorientated Manx Shearwater. Manx Shearwater are one of the designating species of the Skomer, Skokholm and the Seas off Pembrokeshire Special Protection Area (SPA). At the end of August/September young Manx Shearwaters set off from the Islands for the first time and in certain weather conditions (onshore winds, low clouds and fog) the young birds will end up inland, become disorientated and will think wet roads and tarmac surfaces and rivers are the sea and attempt to land. However without rocky outcrops for them to climb on to and launch from the birds become stranded. They have been recorded in Milford, Spittal, Pembroke and luckily in these locations a member of the public is normally able to help. ICAC think that during these weather conditions the young birds may think the surface of the solar arrays are the sea and possibly try and land on them. Obviously as there will not be much activity in these areas it is unlikely the birds would be found until it was too late. They would be very keen during August/September should such weather conditions occur to be allowed access to solar farms to survey

for any stranded birds so they can be released. This would involve one or two individuals surveying the site solely for the purpose of finding any disorientated birds. It would not impact on the use of the farm or reflect badly on the development itself but would be dependent on the land owner allowing access to the site.

11. Historic Environment

- 11.1 There are a number of listed buildings and SAMs within the locality but the ES correctly concludes that only one of these, the Grade II listed Church of St Mary at Nash, would be subject to an adverse effect. Furthermore, the boundary with Cosheston Conservation Area is approximately 650m to the north-west but its character and appearance would not be affected by The Proposal.
- 11.2 There is likely to be some visibility of parts of the site from the settings of the listed buildings and SAMs that are within the locality, most likely from distance views but the impact would not be so great as to either directly or indirectly impact to a degree that would affect their significance. With regard to any effect on Church of St Mary, targeted planting is proposed to gap up the hedgerow along the western boundary and to introduce additional planting. This would ensure that any glimpsed views from within the easternmost part of the churchyard would be screened within 5 years of operation commencement. PCC therefore concur with the conclusion of the ES that, with such mitigation, the Proposal would have no more than a slight adverse effect in the first 5 years of operation, reducing to negligible after 5 years.
- 11.3 The ES confirms that the site has three areas of archaeological interest: Potential Barrow Cemetery, Neolithic / Bronze Age Enclosure and a Small Enclosure, two of which are potentially of regional importance. These AAls will be excluded from the development and subject to a 10m buffer and surrounded by demarcation fencing. This will ensure that the archaeological remains that have been detected in the ES would be preserved. A planning condition is recommended accordingly.
- 11.4 During the construction phase, PCC concur with the conclusion in the ES that there will be a short term minor adverse degree of effect to the significance of the Church of St Mary. Given the brief duration of this effect, the significance of effect is agreed as minor adverse. The effects of decommissioning would be similar.

11.2 Due to the slight adverse effect during operation for the first 5 years and the minor adverse effect during construction, the Proposal is not technically compliant with policy GN.38 because this policy is not tolerant of harm to an historic asset even when such harm is very limited as in this case.

12. Social and Economic Effects

12.1 Pembrokeshire's economy has three main pillars: energy, agriculture and tourism. The Proposal would produce green energy that would contribute to achieving national climate change targets and would add to the growing number of renewable energy projects that are being attracted to Pembrokeshire because of existing infrastructure and supply chains. These new projects are beginning to achieve a momentum that is attracting further interest in potential investment in Pembrokeshire and South West Wales. This fits into both PCC's economic development strategy and the Swansea Bay City Deal where energy is one of the key themes. The Proposal is compliant with policy GN.4 because it enables the supply of renewable energy through environmentally acceptable solutions that is also supported by policies SP 1 (Sustainable Development) and SP 16 (The Countryside). Whilst job creation at the local level may be negligible, there is the potential for positive social and economic effects at the local level which would accord with the objectives of the LDP including the aim of delivering sustainable development albeit that much of the benefit of the Proposal would be at the macro scale in addressing the effects of pollution and climate change.

13.0 Other Matters

Pollution

- 13.1 Other than during the construction phase, the Proposal would not give rise to any significant effects in relation to noise or air quality. Any adverse effects during the construction phase can be satisfactorily mitigated by the inclusion of a planning condition to agree a CEMP. PCC concur with the ES that the chances of encountering any land contamination is low and therefore any adverse effects very unlikely. The ES has adequately addressed matters in relation to the potential for glint and glare.
- 13.2 The Proposal will accord with policy GN.1. Of the relevant criteria relating to pollution, the Proposal is compatible with the site and area, it would not result in a significant detrimental impact on local amenity (albeit there would be a minor negative effect in respect of noise during the construction phase but this effect has been assessed as not significant), there would be no unacceptable harm to health and safety and water quality would not be significantly affected.

Mineral Resource

- 13.3 The Site is situated within an area of mineral resource where the prior extraction of any economic reserves must be achieved, where appropriate, prior to commencement of development to accord with policy GN.22. Having regard to the nature of the Proposal including its reversibility/decommissioning, as well as the environmental issues that may preclude the acceptability of prior extraction in this instance, the Proposal would not conflict with the objectives of policy GN.22.

Agricultural Land Classification

- 13.4 A small part of the site is Grade 2 agricultural land with the remainder being Grades 3a or 3b (refer to Welsh Government Predictive Agricultural Land Classification plan include as Appendix A7). Due to its reversibility and decommissioning, the Proposal would not result in the permanent loss of this land.

HSE consultation zone

- 13.5 The Site is within a HSE consultation zone as indicated on the plan enclosed as Appendix A8.

Water & Drainage

- 13.6 The site is not located within a flood zone. There are ordinary watercourses within and close to the Site. The applicant should be made aware that ordinary watercourses must not be filled in, culverted, or the flow impeded in any manner, without the prior written consent of PCC under Section 23 Land Drainage Act 1991 as amended by the Flood and Water Management Act 2010. Consent is also required to alter a culvert in a manner that would be likely to affect flow of an ordinary watercourse, and for temporary as well as permanent works. Under no circumstances should any structure be built over ordinary watercourses or within 3 metres from the top of bank of any watercourse, or within 3 metres of a culverted watercourse, without the prior agreement of PCC. This will ensure that access can be maintained for future maintenance. Any existing watercourses, drains, ditches and outfalls which are disturbed shall be suitably intercepted and redirected, to ensure that the existing local drainage network is not adversely affected. The developer must ensure that any necessary consents have been obtained before undertaking such works.
- 13.7 The Flood Consequence Assessment states that SuDS would be used within the proposed site to intercept and redistribute surface water runoff

from the new impermeable areas. PCC considers that by virtue of the fact that the construction area having drainage implications appears to be in excess of 100 square metres, the proposed works will require SAB approval.

14. Planning Conditions

14.1 As referenced within the LIR, the following planning conditions are recommended (in addition to the standard time limit for commencement of development).

1. Prior to commencement of development a Construction Traffic Management Plan (CTMP) shall be submitted to, and approved in writing by, the Local Planning Authority. All construction work, including any off-site mitigation, shall be undertaken in accordance with the approved CTMP.
2. Prior to the commencement of development, a scheme for the widening of the access road from the A477(T) to the application site and upgrade works to its surfacing shall be submitted to, and approved in writing by, the local planning authority and these works shall be carried out as approved prior to any other construction works commencing.
3. Prior to the commencement of development, details of both hard and soft landscape works shall be submitted to, and approved in writing by, the local planning authority and these works shall be carried out as approved. These details shall include a statement setting out the design and mitigation objectives and how these will be delivered. Soft landscape works shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant supply sizes and proposed numbers/densities where appropriate; and an implementation programme (including phasing of work where relevant).
4. Prior to the commencement of development a Construction Environment Management Plan (CEMP) shall be submitted to, and approved in writing by, the Local Planning Authority. All works shall be undertaken in accordance with the approved CEMP.
5. There shall be no external lighting unless otherwise first agreed in writing by the local planning authority. Lighting shall accord with the details so agreed.
6. Following the expiration of 6 months of the development not being used for the supply of electricity, a de-commissioning and site restoration scheme shall be submitted to and approved in writing by the local planning authority within 3 months. The scheme shall

include provision for the removal of all elements of the authorised development and restoration of the areas disturbed by the development. Decommissioning and restoration shall be completed in accordance with the approved decommissioning and site restoration scheme within the period set out in the approved scheme.

7. The development shall accord with Plan A and Plan B. However, notwithstanding these plans, before development commences, details of the inverter/transformer cabins, control building, cabins, security fence (including any CCTV), access track and panels shall be submitted to, and approved in writing by, the local planning authority. The development shall accord with the details so approved.
8. The development shall accord with Section 9.6 of the Environmental Statement, Section 2.3 of the Ecological Mitigation and Management Plan and the Landscape Management Plan included in the application.