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Your ref. • Eich cyfeirnod

My ref. • Fy nghyfeirnod NS/0442/19

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Please ask for
Os gwelwch yn dda gofynnwch am

Mike Simmons

Charlotte E Peacock
Development Manager
Wessex Solar Energy

By email only: [REDACTED]

Dear Ms Peacock

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

Location: **Blackberry Lane, Cosheston, Pembrokeshire**

I refer to your pre-application enquiry in respect of the above proposed development that was made valid by reason of the receipt of the requisite fee on 30th January 2020. Thank you for agreeing an extension of time until 6th March 2020.

In accordance with The Developments of National Significance (Wales) Regulations 2016 (as amended), please accept this correspondence as the local planning authority's (LPA) response for the purposes of the Regulations. These comments are made without prejudice to the consideration by the local planning authority of any matters relating to the prospective DNS application.

The documents submitted in support of this pre-application enquiry comprise the "Preliminary Environmental Assessment Report" and the "Request for Screening/Scoping Opinion" from Wessex Solar Energy, both dated January 2020, that were submitted to the Planning Inspectorate (PINS) with covering letter dated 15th January 2020. These comments relate only to what appear to be the main issues from an inspection of the submitted documents to date.

There is no relevant planning history relating to this site. You are aware of the existing solar park situated to the west of Cosheston village. For information, I have enclosed a spreadsheet of nearby consented wind turbines and solar parks.

The Local Development Plan (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. There are a number of policies in the LDP that are relevant in the consideration of this proposed development. The LDP can be found on the Council's website. 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'.

With regard to the principle of the proposed development, Policy SP 1 (Sustainable Development) requires all development to demonstrate how positive economic, social and environmental impacts would be achieved and adverse impacts minimised. It is recognised that a driver for this particular development is obligations and national planning policy relating to the need for a greater proportion of energy production to be delivered from renewable sources. Such a focus has clear social and economic advantages. The issue in respect of policy SP 1 is whether environmental effects can be minimised and that the benefits of the scheme, in achieving local and national renewable objectives, outweigh any identified harm.

The site is located in the countryside. Policy SP 16 (The Countryside) seeks to minimise the visual impact on the landscape whilst promoting enterprises for which a countryside location is essential. The proposed development is one that normally requires a countryside location for primarily land availability, functional and viability reasons. There would clearly be a degree of visual impact, the issue to whether this can be minimised to an acceptable level in accordance with policy SP 16.

The proposal would enable the supply of a greater proportion of renewable energy by way of an environmentally acceptable source that is explicitly supported by reason of policy GN.4 (Resource Efficiency and Renewable & Low Carbon Energy Proposals) and which would contribute to the identified national renewable energy targets.

One of the main issues is visual and landscape impact. Policy GN.1, amongst other matters, allows development when it is compatible with the capacity and character of the site and area, would not result in a significant detrimental impact on local amenity in terms of visual impact, would not adversely affect landscape character, quality or diversity (including the National Park), and does not contribute to the coalescence of settlements or ribbon development. Policy GN.2 (Sustainable Design), amongst other matters, requires development to be appropriate to the local character/townscape context and to be of good design (with the policy describing the detailed requirements in this respect).

As identified in the Screening Direction that has been adopted by PINS, visual and landscape effects would be one the main issues to address as part of the EIA process in order to minimise environmental effects. The content of the Landscape/Visual Appraisal that is appended to the Environmental Assessment Report is noted. The EIA would be expected to analyse in detail visual and landscape effects using established methodologies, including LANDMAP sources and ZVI and photomontage / photo-realisation techniques, including relating to cumulative effects with other development in the locality. On a point of detail, within the LVIA the Lamphey Garden of Historic Interest should be included in the area of land 'of influence'. Whilst effect on landscape character would need to be appropriately addressed in the EIA, it is the potential visual effects that are often the main concern with such development.

It is noted that the "Preliminary Environmental Assessment Report" and the "Request for Screening/Scoping Opinion" do not include site specific detailed plans of the proposed development in terms of layout and landscaping nor are the location of buildings which, from the information provided appear to be up to 4.5m in height, indicated. The buildings have the potential to result in adverse visual effects. Visual effects would be minimised by the retention of all existing hedgerows including those within the site. The existing hedge structure needs to be retained to assist the visual break-up of this large scale development and to retain the landscape pattern and connectivity for wildlife. Additional planting should also be considered.

The National Park boundary is situated to the north. Whilst the view of the rear of panels has often been considered the view of least impact (partly due to the non-reflective materials), experience has informed that the rear view should be treated with equal weight to the front. It can often be a view characterised by a more cluttered appearance with support structures and extraneous plant etc. These effects should therefore be accorded equal focus particularly due to the proximity of the National Park. The National Park Authority has responded to PINS under separate cover and I enclose a copy of this correspondence.

There are nearby properties that appear to have fairly open aspects towards the site and could be adversely affected in terms of visual impact if appropriate mitigation in the form of hedgerow retention / enhancement is not provided.

On design, policy GN.2 (Sustainable Design) seeks to deliver sustainable design. Of relevance to this specific proposal is the need to achieve good design, to be appropriate to local character and landscape context, and to incorporate a resource efficient and climate responsive design that is also flexible and adaptable. The LPA have not had sight of detailed plans other than those relating to individual buildings, fencing etc. For instance, details of layout and landscaping nor the location of buildings have been included. Nevertheless, and notwithstanding visual and landscape effects, subject to appropriate details the proposal has the potential to be considered a design that is compatible with policies GN.1 and GN.2 when considering both its impact and the renewable energy credentials of the proposal albeit that the scale of some buildings may need to be re-visited depending on location and proposed landscaping mitigation. Clearly the proposal is resource efficient and climate responsive. The proposed development is also flexible and adaptable in terms particularly of the relatively ease of returning the site to its former condition and use on the expiration of the development's life.

Policy GN.1 (General Development Policy) seeks to permit development where it would take place in an accessible location and would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network; and it would incorporate sustainable transport and accessibility with necessary and appropriate service infrastructure, access and parking. It appears that the unclassified access road(s) serving the development during the construction phase may need some upgrading and a Road Condition Survey would be needed in this respect. In respect of the trunk road, dialogue with the Transport Division at Welsh Government would be critical. The proposed scope of the EIA in respect of transportation effects is noted.

Policy GN.1 requires development to respect and protect "the natural environment including protected habitats and species". Policy GN.37 (Protection & Enhancement of Biodiversity) states that 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 ... will only be permitted in exceptional circumstances where the effects are minimised or mitigated through careful design, work scheduling or other appropriate measures". Please find enclosed the comments of the Council's Ecologist.

Policy GN.38 (Protection and Enhancement of the Historic Environment) requires development that affects sites and landscapes of architectural and/or historical merit or archaeological importance, or their setting, to only be permitted where it can be demonstrated that it would protect or enhance their character and integrity. In the context of this application, the policy applies to listed buildings, the conservation area, the historic landscape and archaeology.

The site is in close proximity to Cosheston Conservation Area and a number of listed buildings that could be effected by the development. These listed buildings comprise Little Mayeston Cottage, Cosheston (Grade II Cadw Ref. 17270), Lower Nash Corn Mill, Nash (Grade II Cadw Ref. 17271), Church of St Catherine, Nash (Grade II Cadw Ref. 5988), and Upper Nash Farmhouse, Nash (Grade II Cadw Ref.5989). Also Paskeston Hall, Paskeston (Grade II. Cadw Ref. 5957) that is within the National Park. The solar farm would be relatively low lying but would be visible in distant views from buildings higher up. This is likely to apply to Little Mayeston Cottage and Paskeston Hall. Buildings that have designed views of the landscape or buildings that are intended to be viewed from distance would be those that would experience an effect on their setting that would also affect their significance as a listed building. It is potentially only Paskeston Hall that would have this kind of impact on its setting - being higher in the landscape than the solar park and potentially with designed views out into the surrounding landscape. Cosheston Conservation Area is at the top of the adjacent hill several fields' widths away from the furthest corner of the solar park, and as such impact on the Conservation Area is likely to be minimal. In respect of the effect on scheduled ancient monuments, the Milford Haven Waterway and other registered landscape, parks and gardens, these would be matters for CADW to consider. The effect on all attributes of the historic environment that are referred to above should form part of the EIA.

It is noted that a review of the available baseline evidence shows that the study site has a high potential to contain archaeological remains and that these features have the potential to be of regional interest, particularly if they contain well-preserved evidence of occupation activity. The remaining features are likely to comprise more peripheral remains, but nonetheless could be of local interest. Comments of the Council's archaeological advisors, Dyfed Archaeological Trust, are enclosed. In addition, the EIA should include a section addressing the potential impact on the historic landscape, both directly and visually, and undertaken in accordance with the guidance and standard published by the Chartered Institute for Archaeologists.

Policy GN.3 (Infrastructure and New Development), provides a framework for securing necessary infrastructure improvements that are generated by new development and relates to planning obligations normally to be secured by legal agreement. No such planning obligations have been identified at this pre-application stage.

Please refer to Supplementary Planning Guidance that can be found on the Council's website, most notably relating to Renewable Energy SPG (October 2016) and Biodiversity SPG (May 2014). I also refer you to the Well-Being of Future Generations (Wales) Act 2015, most notably the statutory duty therein, the sustainable development principle and the well-being objectives.

It is not clear whether the site is Grade 2, Grade 3a or Grade 3b in terms of agricultural land classification. It may be a mix of all three. The EIA should address how the proposal relates to the classification albeit that it is noted that the proposal would not involve irreversible development of agricultural land.

Whilst relevant planning policy may alter in the replacement LDP2, any weight to be attached to this emerging policy would, at this stage (consultation being undertaken on the Deposit Plan), be premature.

I have not commented in respect of proposed grid connection as this does not appear to form part of the pre-application enquiry.

In summary, it is clear that the main issue is an assessment of the benefits of the development in terms of renewable energy production, the principle of which is

supported by national and local planning policy, and the impact of the development, most particularly in terms of ecology, visual and landscape effects and the historic environment. The EIA should address those matters raised in this correspondence.

I trust that the above comments are beneficial but please contact me if you have any queries.

Yours sincerely

Mike Simmons
Development Manager (Major Projects and Planning Obligations)
Development Management