

**Proposed Solar Park at Blackberry Lane, Cosheston,
Pembrokeshire**

LPA Ref. NS/0442/19

PINS Ref. DNS 3245065

Comments of Dyfed Archaeological Trust

**(advisor on archaeological matters to Pembrokeshire County
Council LPA)**

The Preliminary Environmental Assessment Report, prepared by Wessex Solar Energy (January 2020), includes a section on Cultural Heritage/Archaeology, using information collated by a Desk-based Assessment (DBA) undertaken by Orion Heritage Ltd (Orion Ref 2033, December 2019) and included in Appendix D. We have several concerns regarding this report:

Specification - we advised Orion Heritage Ltd (14/11/19) that we required a specification to be submitted to ourselves in advance so that we could recommend approval of the proposed work on behalf of your Planning Authority. This is in accordance with the Chartered Institute for Archaeologists (CIfA) Standards and guidance for historic environment desk-based assessment (Section 3.2) published in 2014, updated in 2017). No specification was received. Such a document is needed to check that the proposed methodology for the forthcoming assessment is appropriate and includes all relevant information. Without this document we were not in a position to advise further and the resulting report is incomplete. We are therefore unable to accept the DBA in its current form as it does not meet national standards. (see para. 3.2.1) of the CIfA standard & guidance for DBAs)

Search area – the study area for the assessment, although cited as 2km in paragraph 2.4, the study areas presented in Figures 2 & 3 show a 1km study area taken from a central point. We would usually recommend a 2km search area for non-designated sites (and possibly a 5km buffer for designated sites), as we did in our email correspondence in November 2019, and, for such a large-scale development, this should be a buffer from the development boundary rather than from a central point. We asked what type of development was being proposed but didn't receive a response.

Visual impact - the report assesses potential direct impact of the development on the archaeological resource (relying heavily on the findings of a 2013 geophysics survey) but does not address the potential visual impact, both on heritage assets recorded in the vicinity and on the historic landscape. The proposed development is located within a Historic Landscape Character Area and in close proximity to the Registered Historic Landscape of Milford Haven Waterway (HLW (D)3), as defined by Cadw (1998). This requirement is outlined in the generic brief that we supplied to Orion Heritage Ltd last November.

Walkover survey - there is no reference or description of a walkover survey being undertaken, which we consider to be an integral part of such an assessment.

Archive and reporting - we require details on archive submission and the submission of the report to the HER – including reference to the Guidance for the Submission of Data to Welsh Historic Environment Records , which includes a requirement for a Welsh language summary.

Outdated planning policy is cited in paragraph 1.2 (later rectified in paragraph 2.9)

Geophysics survey - the report also raises another concern as the conclusions and recommendations for further archaeological mitigation are largely drawn from a geophysics survey undertaken in 2013. We can find no record of this geophysics report being received by the HER, as is standard good practice (ClfA Standard and guidance for archaeological survey, para. 3.4.6). This survey was commissioned on behalf of the developers by CgMs Consulting Ltd., who, as a ClfA Registered Organisation, should be well aware of their obligations to the historic environment.

The conclusions drawn from the geophysics survey may be appropriate but, until all aspects of the potential impact of the development on the historic environment have been adequately addressed and the report is prepared in accordance with the standard laid out by the ClfA, we are not in a position to make any recommendations to your Authority.