



Great Harmeston Solar Farm Planning Statement





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1. Introduction

- 1.1. ASUK HoldCo 4 Ltd (“the applicant”) are proposing a renewable energy scheme comprising ground mounted solar arrays and associated works on land to the south of Johnston and 1km to the north of Steynton, Milford Haven, Pembrokeshire (“the application site”). The proposed development is called Great Harmeston Solar Farm. A site location plan is provided at **Appendix 1**.
- 1.2. By virtue of its potential generating capacity, which stands at circa 65MWac [Megawatts], the proposed development constitutes a Development of National Significance (“DNS”). Therefore, instead of applying to the Local Planning Authority for Planning Permission, the application will be made to the Planning and Environment Decision Wales (PEDW). The application process is managed by PEDW on behalf of the Welsh Ministers.
- 1.3. This Planning Statement is being published to accompany a statutory pre-application consultation carried out under Articles 8 and 9 of the Development of National Significance (Procedure) (Wales) Order 2016. The pre-application consultation is a collaborative process between the applicant and the community consultees, specialist consultees, relevant persons and owners or occupiers of land adjoining the development site. Following the end of the consultation period, a Consultation Report must be prepared by the applicant. This will be submitted with the final planning application and will provide details of the consultation process, the representations received and the applicant’s response to them.
- 1.4. The statutory pre-application consultation runs from 18 March 2026 to 22 May 2026.
- 1.5. The applicant expects to submit the formal planning application by the end of summer 2026.

The Applicant

- 1.5.1. ASUK HoldCo 4 Ltd is a subsidiary of Arise Renewable Energy UK Ltd.
- 1.5.2. Arise Renewable Energy UK Ltd is a leading independent renewable energy company operating across UK, Sweden, Finland, Norway and Ukraine. Arise manage the full value chain, from exploration and permitting to financing, construction, sales, and long-term management of renewable electricity production. Arise has a growing portfolio which exceeds 8,500 MW, including wind, solar, and battery storage projects. The company currently manages around 2,000 MW of wind power and own 11 wind farms in southern Sweden. Arise employs around 70 people.
- 1.6. The issues relevant to the assessment of the draft application proposal are set out in this Statement. The subsequent sections of this Statement are divided into: –

Section 2: The Application Proposal

- 1.7. The section contains a description of the application proposal.

Section 3: Background for renewable energy schemes in Wales and the UK



1.8. The section summarises the key legislative background and support for standalone renewable energy schemes in Wales and the UK.

Section 4: Application Site and its Surrounds

1.9. This section contains a description of the application site and its environs.

Section 5: Planning Policy Context

1.10. The planning policy context for the application site includes both national policy guidance and the development plan which include Future Wales and Planning Policy Wales. Brief explanations of the key policies pertaining to the development proposal are contained within this section.

Section 7: Planning Balance

1.11. This section establishes the planning balance for the development proposal.

Section 8: Conclusions

1.12. This section provides the concluding comments in relation to the application proposal.

Supporting Documents

1.13. The statutory pre-application consultation is supported by the following draft documents:

- Draft Application Form
- Notice
- Planning Application Drawings
- Design and Access Statement
- Planning Statement (this statement)
- Green Infrastructure Statement
- Flood Consequence Assessment & Drainage Strategy
- Noise Assessment
- Environmental Statement, with technical chapters assessing: –
 - Landscape and Visual Impact
 - Nature Conservation and Biodiversity
 - Cultural Heritage
 - Socio Economics

- Glint & Glare
- Environmental Statement Non-Technical Summary
- Outline Construction Traffic Management Plan
- Outline Construction Environmental Management Plan
- Outline Construction Biodiversity Management Plan
- Geo-Environmental Assessment (Phase 1)
- Arboricultural Impact Assessment
- Agricultural Impact Assessment

Statutory Requirements

- 1.14. In August 2025, the applicant submitted to PEDW a request, made under regulation 31(1) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) (“the Regulations”), for the Welsh Ministers to make a screening direction as to whether or not the proposed development is “EIA Development” within the meaning of the Regulations. On 3 October 2025, a Screening Direction was adopted by PEDW, on behalf of the Welsh Ministers, confirming the proposal was EIA Development.
- 1.15. Accordingly, a draft Environmental Statement has been prepared to support the statutory pre-application consultation.



2. Application Proposal

2.1.1. The main element of the application proposal is the construction, operation, maintenance and decommissioning of a ground mounted solar farm with an intended design generation capacity of circa 65 mega-watts alternating current (MWac). The electricity generated would be enough to power the equivalent of up to 34,444 typical family homes per year, helping to cut carbon emissions and support the transitions away from fossil fuels. The proposed development would also result in the reduction of carbon dioxide emissions of over 11,532 tonnes of CO₂ per year.¹

2.1.2. The proposed layout is provided at **Appendix 2** and the ancillary drawings are provided at **Appendix 3**.

2.1.3. Key components of the proposed development include:

- Solar photovoltaic (“PV”) fixed panels mounted on a simple metal framework;
- Associated infrastructure including access tracks, parking, CCTV, gates and fencing, lighting drainage infrastructure, storage containers, earthworks, culverts, surface water management, maintenance and welfare facilities, security cabins and any other works identified as necessary to enable the development
- On-site 132kV Substation compound;
- Low voltage cabling to connect and transmit electricity from the solar PV modules to the on-site 132kV substation.
- Underground cabling connecting the 132kV on-site substation to the existing overhead 132kV powerline located at the south of the development site.
- A number of central inverters (inverters and transformers housed together in prefabricated containers) at various locations around the arrays;
- Boundary fencing (e.g. deer fencing) around the edge of the solar farm at a maximum height of 2.4m above original ground level;
- A CCTV system, either pole or fence-mounted, located at strategic points around the site perimeter for security and maintenance reasons, maximum height of 4m;
- Associated internal service tracks;
- Relevant communications (potential communications mast up to 15m) and monitoring equipment in substation area;

¹Source: Homes: 65MWac / 2700kWh (average UK home) = 34,444. CO2: 65MWac solar scheme based on a reasonable expected yield of 1,000 kWh/kWp/year and a carbon intensity of 0.124 kg CO2/kWh per the 2023 BEIS dataset = 11,532

- Landscaping and biodiversity enhancements;
- Temporary development during the construction phase including construction compound, parking, and temporary internal access tracks; and
- A number of separate access points into the Site for construction, operation and decommissioning purposes, predominantly utilising existing farm access points.

Design Parameters and the Rochdale Envelope

- 2.1.4. The design of the proposal has been refined throughout the EIA process. It is recognised that parts of the proposal's design and construction methodology may be subject to further refinement and optimisation prior to and during construction. This is very pertinent to solar development due to the rapid pace of change in technology. For example, as technology advances, it is possible that solar PV panels could become more efficient, which could result in a potential reduction in total panel area required to deliver the same amount of generation. This in turn could require the micro-siting of panels and the associated equipment and infrastructure to reflect such changes, i.e., the final alignments of cabling and the number and location of panels, substation, inverters and transformers.

Buffer Zones

- 2.1.5. A number of buffer zones have been established to protect valuable natural resources, including trees and ecologically important field margins. The following minimum buffers have been adopted as standard as part of the design of the Proposed Development:
- 10m from ordinary watercourses
 - 5m from hedges and trees or further depending on root protection areas (RPA)
 - Appropriate distances from residential curtilage
 - 30m from badger setts
 - For 132 kV lines: minimum 12–15 m horizontal clearance from conductors

Components of the Proposed Development

- 2.1.6. The design parameters for each component of the Proposed Development are detailed within the following sections. These have been used to inform the assessment detailed within this ES.

Solar PV panels and framework

- 2.1.7. The solar PV panels generate electrical power by converting solar irradiance into direct current (DC) electricity. A solar PV panel consists of a layer of silicon cells, an anodised aluminium frame and various wiring to allow current to flow from the silicon cells. Silicon is a non-metal with conductive properties that allow it to absorb and convert sunlight into electricity. When light interacts with a silicon cell, it causes electrons to be set into motion, which initiates a flow of electric current.

- 2.1.8. The solar PV panels will be a maximum of 3m in height above ground level (AGL), on a fixed framework. The minimum height of the lowest part of the solar panels (i.e. not including the mounting structure) will be 0.8m AGL, at a fixed orientation and tilt angle between 10–25°, facing due south. There will be a distance of approximately 3.5m between the solar PV panels of each parallel row, responding to topography.
- 2.1.9. For the fixed system, the mounting structure will be supported at intervals by double mounted posts. The posts will be pushed into the ground with a small plant rig, to depths of approximately 1.5m and this will be guided by localised ground conditions. The rest of the mounting frame would then be fitted to the posts to create angled support tables ready for the solar PV panel installation.
- 2.1.10. Depending on ground conditions, the posts may be mounted to ballast slabs. If any areas of archaeological interest are identified within the work area, then consideration will be given to the use of non-intrusive installation method, where the posts will be fixed into concrete pads resting on top of the ground. However, there is currently no identified need for this method within the site.
- 2.1.11. Land between and beneath the solar PV panels would be used for biodiversity enhancements including dedicated skylark mitigation areas and potentially for seasonal sheep grazing for maintenance. Mechanical cutting may also be deployed to manage the grass outside of ecological mitigation enhancement areas.

String Inverters and Inverter Transformer Stations

- 2.1.12. String inverters take direct current (DC), as generated by the solar PV panels, and convert it into alternating current (AC) to enable the on-site generated electricity to be transferred to the on-site substation and in turn to the local electricity distribution network. The design of string inverters varies between manufacturers, but they are typically approximately 1.1 m wide × 1 m high × 0.5 m deep and attach to the end of panel rows. An approximate 200 string inverters and 90 inverter / transformer stations are anticipated to be spread across the solar PV panelled areas. Due to the continuing advances in solar technology, it is not possible to specify the precise type of inverter at this time, as this will depend on the detailed electrical design and competitive procurement process. However, final details could be controlled through suitably worded planning conditions requiring the final details to be submitted for approval.

Electrical Cabling and Point of Connection

- 2.1.13. The solar PV panels will be connected in strings and insulated cabling will be routed in channels fixed on the underside of the mounting frame before being taken below ground. The 33kv electrical cabling from the arrays will be concealed in shallow trenches linking the solar panels to the inverters / transformers and then to the 132kV on-site substation. The dimensions and depth of the trenches would vary depending on the amount of cabling and ground conditions, typically they would be up to 1m in depth and 0.5m wide. The cable trench may also carry earthing and communications cables and will be backfilled with fine sands and excavated materials to the original ground level. Where the solar panels straddle both sides of the existing railway line, two options for the connecting cabling are put forward. Option 'A' is directional drilling of the cable under the railway line. Option 'B' is to lay the cable in an open-cut trench along a section of the A477 and the A477 bridge (or its service duct) which crosses the railway line. It is anticipated that the underground cabling connecting the 132kV on-site substation to the existing overhead 132kV powerline would be



laid by open-cut trench. At the point of connection, there may be upgrade works required to the existing pylon to facilitate the connection works.

- 2.1.14. The construction process will follow a soil management plan to ensure that the soil structure and quality are not degraded as part of the construction process. A Soil Management Plan is included within the accompanying Outline CEMP.
- 2.1.15. The underground cables will be located in existing gaps in hedgerows wherever feasible, however this assessment assumes the loss of some sections of hedgerows as a worst case.
- 2.1.16. It is anticipated that underground cabling would be left in-situ during the decommissioning phase to avoid unnecessary ground disturbance.

Substation Compound

- 2.1.17. The design provides for an onsite 132kV substation and compound which is necessary to step up the voltage of the electricity delivered by the solar PV panels from 33kV to 132kV, and connect into the National Grid. The onsite 132kV substation compound would have a footprint area of between approximately 15m² and 25m² and a below eaves height of 3m.
- 2.1.18. The onsite 132kV substation compound would be gated with security fencing, with a 2.4m high palisade fencing. Except for the concrete foundations for the various equipment components, the onsite 132kV substation compound would comprise ground that would be permeable to surface water. Whilst downward facing external lighting will be installed at the onsite 132kV substation compound for emergency work during hours of darkness, the substation will not be continuously lit. The final design for the substation would be subject to agreement with the DNO.

Access Tracks

- 2.1.19. Access to the Proposed Development during operation would be required for maintenance. Access to the Proposed Development is proposed through existing access points and one new access. Once accessing the Site, the internal access tracks will connect into the various land parcels.
- 2.1.20. The Proposed Development would utilise existing farm track routes, where practicable, with new access tracks approximately 4.5m wide, created as required. The access tracks have been located so they utilise existing field gates between fields to reduce the impact on hedgerows where practicable. Inverter stations will be located off a number of these internal access tracks.
- 2.1.21. The access track would be made of permeable, crushed stone and formed by excavating 150mm and laying clean Type 1 aggregates. This in turn, would be laid on a compacted soil base, with a depth of 350 mm.

Operational Phase

- 2.2. The design life of the proposal is expected to be operational for a maximum of 40 years. During operation, human activity on the Site will be minimal and would be restricted principally to:

- Landscaping and ecological management in accordance with the detailed CEMP and CBMP,
- equipment maintenance and servicing,
- replacement of any components that fail, and
- monitoring to ensure the continued effective operation of the Proposed Development.

2.3. There will be frequent visits made by off-site workers in a small van or similar to ensure that the proposal is maintained properly.

2.4. Operational areas will be surrounded by perimeter fencing with pole-mounted CCTV cameras adjacent to the perimeter fencing for security.

Landscape and Biodiversity

2.5. Ecological mitigation and enhancement measures form an integral part of the proposals, including the retention of woodland, hedgerows, ponds and riparian habitats, incorporation of native planting to strengthen habitat connectivity, and the maintenance of dark corridors along hedgerows and the riparian corridor to safeguard bat commuting and foraging routes.

2.6. Green infrastructure features such as habitat buffers and grassland creation areas have been located alongside higher-value habitats and woodland edges, ensuring that ecological function is maintained while delivering additional biodiversity benefits across the Site. Invasive non-native species will be managed through appropriate mitigation measures to prevent spread and safeguard the integrity of retained habitats and green infrastructure assets. Recorded stands of Japanese knotweed will be subject to a site-specific management strategy, including the establishment of buffer zones, biosecurity controls during construction, and treatment and/or removal by suitably qualified contractors in accordance with best practice guidance and relevant legislation.

2.7. Key measures include:

Features	Description
Habitat creation and tree planting	<p>Creation of areas of new native biodiversity planting, including deep buffers along higher ground and adjacent to Public Rights of Way to the north of the Site, providing landscape screening, enhanced ecological connectivity and increased habitat extent;</p> <p>Native planting to reinforce existing woodland blocks and strengthen the riparian corridor;</p> <p>Occasional large-scale native tree planting along Site boundaries and adjacent to Public Rights of Way to filter views, increase canopy cover and enhance habitat structure; and.</p>

	<p>Replacement of trees removed as part of the development at a minimum ratio of 3:1, delivering a net gain in tree cover and long-term structural diversity.</p>
<p>Hedgerow restoration and creation</p>	<p>Infill planting of existing hedgerows across the Site at approximately a 30 percent infill rate to address gaps and improve habitat continuity;</p> <p>Extension of existing hedgerows to strengthen ecological connections between woodland blocks, ponds and the riparian corridor;</p> <p>Height management and reinforcement of key hedgerow sections to improve screening while maintaining permeability for wildlife movement; and</p> <p>Creation of new native hedgerows where required to further enhance connectivity and define the Site's green infrastructure network.</p>
<p>Grassland enhancement and creation</p>	<p>Management and enhancement of existing rush pasture to function as a dedicated skylark mitigation area</p> <p>Creation of tussocky grassland and wildflower-rich meadow habitats using appropriate native seed mixes (such as Emorsgate EM10 Tussock Meadow Mix or similar) to increase structural diversity and invertebrate value</p> <p>Establishment of species-rich meadow grassland across lower-value agricultural land using grazing meadow mixes (such as Emorsgate EM2 General Purpose Meadow Mix or similar) to replace and enhance areas of arable and modified grassland</p> <p>Retention and enhancement of areas of neutral grassland alongside new grassland creation to deliver a connected mosaic of open habitats</p>
<p>Riparian corridor enhancement</p>	<p>Strengthening of the riparian corridor through buffering with native woodland and grassland planting</p> <p>Retention and enhancement of natural vegetation along the watercourse to improve habitat quality, connectivity and hydrological function</p> <p>Sensitive integration of crossing points for underground cabling to maintain ecological continuity</p>

<p>Ponds and wet features</p>	<p>Retention of all existing ponds within the Site (with the exception of Pond 1 which has been infilled prior to the updated walkover survey);</p> <p>Protection and enhancement of pond margins through native planting and habitat buffering to improve freshwater habitat networks</p>
<p>Species-specific enhancements</p>	<p>Delivery of skylark mitigation areas through targeted management of rush pasture and tussocky grassland habitats;</p> <p>Maintenance of dark corridors along hedgerows, woodland edges and the riparian corridor to support bat commuting and foraging; and</p> <p>Installation of bird and bat boxes within retained trees and woodland edges to provide additional nesting and roosting opportunities</p>

Decommissioning

- 2.8. Following a 40 year operational period, the scheme would be decommissioned. The operator will likely either be insured or enter into a bond to guarantee that the scheme is decommissioned at the end of its operational lifespan. The applicant is therefore in position to provide the appropriate provisions for the decommissioning of the scheme.
- 2.9. Depending on the ecological value of the habitats that develop over the lifespan of the scheme, it is possible that certain areas of the site may need to be retained due to their value for wildlife on decommissioning. It cannot reasonably be foreseen what legislative protection will be afforded to particular wildlife species at the end of the scheme's lifespan. Further surveys for protected species which could be impacted by decommissioning would also be expected. No less than 12 months before the 40th anniversary of the first export date, a decommissioning and site restoration scheme would be submitted to the relevant planning authority for approval (subject to appropriate condition). The decommissioning strategy would detail how plant and equipment located within the application site would be removed.

3. Background and Renewable Energy in Wales and the UK

Welsh Commitment to Address Climate Change

- 3.1. Part 2 of the Environment (Wales) Act 2016 (2016 Act) introduced the provisional requirements for the Welsh Government to reduce emissions of greenhouse gases, including a requirement to ensure that net emissions for 2050 are at least 80% lower than the baseline.
- 3.2. In 2017, the Welsh Government set renewable energy targets as part of their commitment to a more sustainable future for Wales. These targets included the need for Wales to generate electricity equal to 70% of its consumption from renewable sources by 2030.
- 3.3. The 70% renewable electricity target for 2030 represents an initial step in the development of renewable energy in Wales, as Wales' energy systems transition to net zero. In July 2023, following a consultation period in which broad support was received for the Welsh Government's renewable energy ambitions, the Welsh Government adopted new energy targets for 2035. These include:
 - Generating the equivalent of 100% of Wales' annual electricity consumption from renewable sources by 2035.
 - Installing 580,000 heat pumps across Wales by 2035.
 - 1.5 GW of renewable energy capacity to be locally owned by 2035
- 3.4. In February 2021, the Welsh Government adopted a suite of regulations, known as The Climate Change (Wales) Regulations 2021 which formally commit Wales, for the first time, to legally binding targets to deliver the goal of net-zero emission by 2050. By setting a long-term framework for meeting the net zero 2050 target, the regulations provide milestones and a direction of travel for Wales' decarbonisation pathway, whilst the carbon budgets help to focus near-term action to enable Wales to reach their long-term goal. They provide clarity on the Welsh Ministers' vision for, and commitment to, a net zero future. As such, they provide a context for today's decision-makers to safeguard the needs of future generations.
- 3.5. However, the targets and budgets are achieved, reducing Welsh emissions will help to lessen the impacts on Wales and the world arising from increased temperatures. These impacts include flooding, risks to health, water shortages and risks to biodiversity. The Welsh Government is proposing to increase Wales's climate targets in response to the latest climate science and the recommendations of the Climate Change Committee (CCC) regulations that priorities the delivery of renewables are: -
 - The Environment (Wales) Act 2016 (Amendment of 2050 Emissions Target) Regulations 2021, which increase the 2050 greenhouse gas emissions reduction target from 80% to at least 100% lower than the baseline;
 - The Climate Change (Interim Emissions Targets) (Wales) (Amendment) Regulations 2021, which update the existing 2030 and 2040 targets from 45% and 67% to 63% and 89% respectively. They align the interim targets with the new 2050 target and

front load climate action in the 2020s in line with the Climate Change Committee (CCC)'s advice;

- The Climate Change (Net Welsh Emissions Account Credit Limit) (Wales) Regulations 2021, which revise the existing carbon budgets for 2021–2025 and 2026–2030 to an average of 37% and 58% reductions below the baseline (respectively); and
- The Climate Change (Carbon Budgets) (Wales) (Amendment) Regulations 2021, which limit the use of carbon offsets for 2021–2025 to 0%. They effectively prohibit using carbon offsets during this period.

3.6. On 1 January 2021, the United Kingdom left the European Union Internal Energy Market (IEM). The IEM allows harmonised, tariff-free trading of gas and electricity across Europe (through interconnectors), leading to lower prices and greater security of supply. As wholesale gas and electricity prices in the UK are generally higher than elsewhere in Europe, interconnection has caused a reduction in wholesale prices, and hence consumer prices in the UK. Leaving the IEM has the potential to impact the trade of energy through interconnectors. The Government's Briefing Paper on Energy, Climate Change and Brexit identifies how one potential impact of leaving the IEM is an increase in the cost of energy imports and this in turn would be passed on to UK's householders and businesses. In terms of energy security, it notes how the interest of the United Kingdom should be to increase the flexibility and resilience of the grid, especially with increasing intermittent renewables.

3.7. In April 2006 all 22 unitary authorities in Wales signed the Welsh Commitment to address Climate Change. This commitment was developed with the Welsh Assembly Government. It commits the individual authorities to work to adapt to the effects of climate change and to reduce emissions of greenhouse gases. Wales is the only country in the European Union where all local authorities have signed a public commitment to address climate change.

Energy Generation in Wales 2022, published October 2023

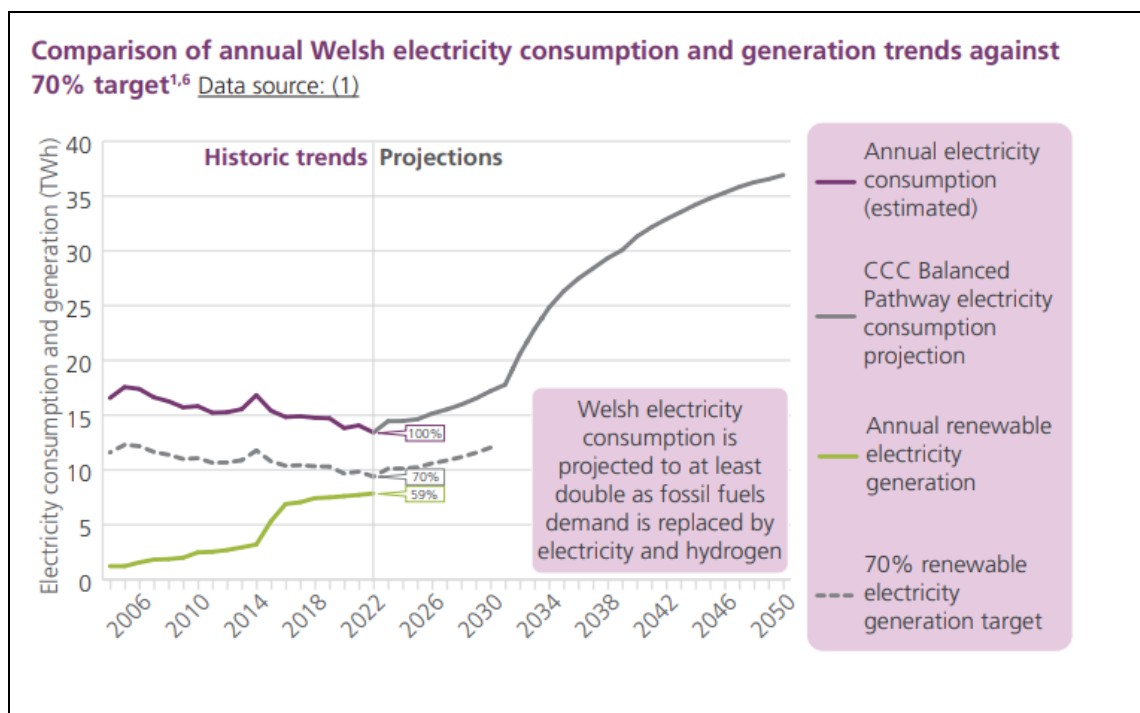
3.8. The Energy Generation in Wales report 2022, identified how approximately 27% of all Welsh electricity generation came from renewables. This is down from 33% in 2020 due to significant increase in generation from non-renewable sources.

3.9. Other key headlines of the report are: -

- Wales generated a total of 29 TWh of electricity in 2022, 7.9 TWh of which came from renewables and 21.1 TWh from fossil fuels
- 43 MW of renewable electricity capacity was installed in 2022, down from 116 MW installed in 2021
- Renewable electricity generation in Wales has tripled since 2008 and doubled since 2012, but has only increased by 11% in the last five years
- 2022's renewable energy installation rate is the second lowest in the last decade and is nearly ten times lower than the 2015 peak, when more than 1 GW of renewable energy capacity was installed

3.10. In terms of progress towards the 70% target by 2030 and 100% by 2035; in 2022, this figure stood at an estimated 59%, up from 55% in 2021 and 19% a decade ago.

3.11. Progress towards Wales’s target is impacted by changes to both electricity consumption and electricity generation. Between 2021 and 2022, Welsh electricity consumption is estimated to have fallen by almost 650 GWh while renewable electricity generation increased by over 130 GWh. Therefore, progress towards the target in 2022 was predominantly due to a fall in electricity consumption. Although electricity consumption in Wales has reduced over the last two decades, it is projected to increase in the future. Fossil fuel consumption in the heat and transport sectors is projected to transition to electricity and hydrogen as Wales decarbonises, which could result in electricity consumption more than doubling by 2050 (this is discussed further below). This increasing electricity demand will need to be met by increasing renewable generation to meet and maintain Wales’ progress towards targets. A comparison of annual Welsh electrical consumption and generation trends against the 70% is shown on the table below. A step change will be required in the provision of renewables to achieve the projected 100% of renewables by 2035.



Review of Wales’ Renewable Energy Targets, published 24 January 2024

3.12. The document identifies that “The deployment of renewables in Wales and the UK has slowed since 2015, largely as a result of the UK Government’s approach to its renewable incentives, withdrawing key subsidies that secured a route to market. While renewables-based electrical capacity continues to increase year-on-year, the current rate of growth will not be enough to meet our demand, especially in light of our future electricity needs. Our Energy Generation in Wales 2021 report provides a baseline for our current estimated generation”.

3.13. The Energy Generation in Wales report 2021 estimates that only 28% of total electricity generation in Wales comes from renewable energy sources. Page 3 of the report identifies how “An increase in electricity generation from gas in 2021 compared to 2020 has resulted in the estimated percentage of total electricity generation delivered by renewables decreasing from 33% to 28%, despite the absolute renewable generation figure increasing.”

It is therefore the case that electricity consumption in Wales is estimated to have increased at a faster rate than renewable electricity generation in Wales in 2021.

- 3.14. In recognition towards the recent surge in the global price of gas, combined with Russia's war in Ukraine, has resulted in huge increases in energy prices across the world, with the impact felt hardest by those who are least able to bear it. Page 8 of the Report states (inter alia) *"The Welsh Government is providing support to those in urgent need in the short term, while building a future energy system which insulates Wales from the worst of the impacts. Extending fossil fuel use will only result in problems in the longer term. Instead, Wales will improve energy efficiency and develop a renewables based energy system fit for the future"*.

Pembrokeshire County Council

- 3.15. At a local level, Pembrokeshire County Council has made a commitment to become carbon zero by 2030 after declaring a climate emergency in May 2019. Consequently, the council have formulated a 'Net Zero Carbon Action Plan' which outlines its commitment to the climate emergency and how the council intends to transform to become a net zero Council. The plan was created in 2020. Whilst the Plan focuses on reducing the Council's emissions. It also highlights how the Council will involve the community and will work with local partners to bring about equal change.

South West Wales Energy Strategy

- 3.16. The South West Wales Energy Strategy was adopted in March 2022 and was developed by the South West Wales Energy Core Group, a sub-group of the Regional Directors' forum from the four local authorities in South West Wales, which includes Pembrokeshire County Council. Its vision for 2035 is *"Harnessing the region's low carbon energy potential across its on and offshore locations, to deliver a prosperous and equitable net zero carbon economy which enhances the well-being of future generations and the region's ecosystems, at a pace which delivers against regional and national emissions reduction targets by 2035 and 2050."*
- 3.17. The core principles of the strategy include:
- Optimise the wide range of regional natural resources such as solar, wind (on and off-shore, including floating off-shore wind (FLOW)), biomass, hydro and marine (including wave, tidal stream and tidal range technologies), to maximise low carbon electricity generation and help achieve a de-carbonised economy
 - The transition to a low carbon economy needs to improve lives for all and for benefits to be shared in an equitable way. The vision will support inward investment to the region; encourage the growth of sustainable local supply chains, including cutting edge research and development; the creation of resilient manufacturing, construction, operations and maintenance jobs; and affordable energy and energy-efficient housing across the region.
- 3.18. The strategy seeks to encourage a mix of low carbon energy technologies with the aim to generate more than 100% of the region's electricity demand from low carbon sources on an annual basis, working towards meeting demand on a constant basis.



UK OVERVIEW

- 3.19. The explicit need to introduce a step change in how the country deals with climate change has been recognised by the UK Government who, on 1 May 2019, declared an Environmental and Climate Change Emergency, following the finding by the Inter-governmental Panel on Climate Change, that to avoid more than 1.5°C rise in global warming, global emissions would need to fall by around 45 per cent from 2010 levels by 2030, reaching net zero by around 2050. Through the declaration, the Government recognises a need to move swiftly to capture economic opportunities and green jobs in the low carbon economy, while managing risks for workers and communities currently reliant on carbon intensive sectors. The Welsh Government made its climate emergency declaration in April 2019. The declaration sends a clear signal that the Welsh Government will not allow the process of leaving the EU, to detract from the challenge of climate change, which threatens our health, economy, infrastructure and our natural environment.
- 3.20. The Climate Change Act 2008 (2050 Target Amendment) Order 2019, SI 2019/1056 (the order), came into force on 27 June 2019 and amended the legally binding target to reduce greenhouse gas (GHG) emissions set in section 1 of the Climate Change Act 2008 (CCA 2008) from 80% to 100%, or net zero.
- 3.21. On 20 April 2021, the UK Government announced its commitment to reduce carbon emissions by 78% by 2035 compared to 1990 levels (including, for the first time, emissions from shipping and aviation). The new target is set out in The Carbon Budget Order 2021, which came into force on 24 June 2021.
- 3.22. In June 2022, the High Court found that the UK Government's Net Zero Strategy breached the Climate Change Act 2008 because it didn't detail how emissions cuts would be achieved. The High Court ordered the Government to inform parliament by April 2023 of how specific policies would contribute towards reducing emissions. On 30 March 2023, the Energy Security Secretary published a host of documents which outlined ambitious plans to scale up affordable, clean, homegrown power and build a thriving green industry. Powering Up Britain (March 2023) presents an overarching delivery plan which brings together the government targets for energy security, reducing household bills and maintaining its goal towards achieving net zero, including:-
- Accelerating deployment of renewables by quintuple solar power by 2035.
 - Speeding up the planning consenting process – alongside Powering Up Britain, the Government has published a revised set of energy national policy statements for consultation, covering overarching energy, renewables, electricity networks, gas generation, and pipelines. On 23 February 2023 the Government published its Nationally Significant Infrastructure Project (NSIP) Action Plan, which sets out how the government will reform the consenting process to ensure the planning system can deliver for the future, to meet the demands of a greater number and complexity of cases and deliver against government's ambitions.
 - Through the Revised National Policy Statement for renewable energy (EN-3 (March), Government has committed to sustained growth in solar capacity to ensure that the UK maintains a pathway to meet net zero. EN-3 identifies how solar also has an important role in delivering the government's goal for greater energy



independence. The British Energy Security Strategy states that government expects a five-fold increase in solar deployment by 2035.

3.23. There is a plethora of Government legislation, guidance and policy which support the transition to a low carbon future and the continued roll out of renewables and low carbon energy and associated infrastructure. With regards to the need for development, the explicit need to introduce a step change in how the country deals with climate change was recognised via the UK Government's declaration of an environmental and climate change emergency on 1 May 2019, following the findings of the Intergovernmental Panel on Climate Change (IPCC) who concluded that, to avoid a greater than 1.5°C rise in global warming, global emissions would need to fall by around 45 per cent from 2010 levels by 2030, and reach net zero by 2050 at the very latest.

3.24. The IPCC Sixth Assessment report, published in March 2023, is a stark warning of the devastation that will be unleashed if we fail to urgently limit global temperature rises and has been referred to as a "Code Red for Humanity" by the Secretary-General of the UN, António Guterres, illustrating the urgent and desperate need for rapid decarbonisation.

Energy White Paper

3.25. On 14 December 2020, the Government released the Energy White Paper which sets out the Government's vision of how the UK will clean up its energy system and reach net zero emissions by 2050. The white paper addresses the transformation of our energy system, promoting high-skilled jobs and clean, resilient economic growth as we deliver net-zero emissions by 2050. The white paper identifies how "A low-cost, net zero consistent system is likely to be composed predominantly of wind and solar" It goes on to state how "Onshore wind and solar will be key building blocks of the future generation mix, along with offshore wind". COP26 agreement included accelerating the transition to 100% zero emissions cars and vans for the UK by 2035.

Clean Growth Strategy

3.26. The Clean Growth Strategy, published in October 2017, presented a comprehensive set of policies and proposals that aim to accelerate the pace of "clean growth", i.e. deliver increased economic growth and decreased emissions. To achieve the clean growth, the Government identifies how the UK will need to nurture low carbon technologies, processes and systems that are as cheap as possible, this includes subsidy free ground mounted solar parks as achieved by this development proposal. The Government places significant emphasis on securing increased investment across the energy systems whilst minimising, as much as possible, the public costs for securing such investments and makes multiple references to how they are seeking the delivery of solar without subsidy. Moreover, page 99 specifically states how the '**Government want to see more people investing in solar without government support**'

British Energy Security Strategy

3.27. The Government's British Energy Security Strategy (7 April 2022) explicitly highlights the urgent need for the UK to rapidly develop not only a decarbonised energy system but one that is more self-sufficient. This strategy provides a direct response by the Government to develop an energy system which is not so heavily reliant on imported oil and gas which has seen significant spikes in global cost and the overall cost of living following the impacts of

the COVID-19 pandemic and Russia's invasion of Ukraine. As part of this strategy, the increased deployment of ground based solar development is identified by the Government to hold a key role in the realisation of these aims, with the government targeting a fivefold increase in the level of Solar PV development by 2035 (Up to 70GW). In addition to the increased uptake of decentralised renewable energy, the Energy Security strategy demonstrates the parallel need for improved grid flexibility and energy storage capacity and sets out that new appropriate policy will be developed to enable and encourage investment into sufficient, long duration electricity storage.

- 3.28. The targets set out within the Government's British Energy Security Strategy are reflected in the National Grid's annual Future Energy Scenarios Report (FES), the latest edition was published in November 2025. The report explores a range of routes to net zero in 2050 for energy demand and supply by considering the choices that can be made and the uncertainties. All pathways set out in the report sets out a need for high levels of solar deployment, from 18.8GW in 2024 to up to 46.8GW by 2030, and increasing to 55GW of solar by 2035. and reaching a minimum of 87.2GW by 2050.
- 3.29. However, it is currently estimated that the targeted delivery of up to 70GW of Solar PV generation required under the British Energy Security Strategy by 2035, will only be met under two scenarios, with Leading the Way achieving this target by 2040 and Consumer Transformation achieving this target prior to 2050.
- 3.30. The Government targets and National Grid estimations set out above are further compounded by the National Infrastructure Commission publication 'Net-Zero Opportunities for the Power Sector, March 2020) which sets out key infrastructure requirements needed to meet the UK's 2050 net-zero target, including the amount of renewable energy development that would need to be deployed.
- 3.31. The NIC recommends that in meeting these targets, the UK's energy mix needs to be made up of around 90% renewables. At page 18 of the report, it is recommended that across all scenarios, significant levels of solar, onshore wind and offshore wind will need to be deployed with between 129 – 237 GW (gigawatts) of renewable energy capacity in operation by 2050. To achieve this, the report recommends the following split:
- 56-121 GW of solar;
 - 18-27 GW of onshore wind; and
 - 54-86 GW of offshore wind.
- 3.32. To achieve the above targets would require a significant increase in installed capacity across the UK. The latest Digest of UK Energy Statistics (DUKES) for renewable sources of energy, published in July 2025, identified that as of 2024, the solar capacity was only 18GW.
- 3.33. When considering the above figures and applying them to the number of local authorities across the UK, this would mean that there is an additional 106.9 GW of solar capacity required across the 382 local authorities across England, Scotland, Wales and Northern Ireland required to meet the NIC's upper figure for solar.

- 3.34. It is therefore reasonable to surmise that every local planning authority, where appropriate developable land allows, should be delivering a significant amount of renewable energy capacity, considering a mixture of landscapes and terrain.
- 3.35. To support a prosperous and rural economy, the diversification of agricultural and other land-based businesses is strongly supported by the Government. With the risk of shortfalls resulting from the loss of future subsidies, many farmers are looking to diversify to improve income and provide stability for the agricultural sector. Currently over 60% of farms now employ some form of diversification (according to the 2015/16 Farm Business Survey (FBS)) with diversification ventures ranging from simple building lets, farm shops and installing solar panels for the generation of green energy. The diversification of agricultural land to provide renewable energy generation is a widely accepted form of agricultural diversification and is acknowledged to provide significant financial stability to existing farmsteads and rural businesses.

Mission Zero – Independent Review of Net Zero (Rt Hon Chris Skidmore MP, January 2023)

- 3.36. An Independent Review of the UK's Net Zero Targets and current progress, published by the Rt Hon Chris Skidmore MP, makes several recommendations to the Government to ensure UK remains on track to realise its Net zero targets by 2050. The main recommendations made to Government resulting from the review are as follows:
1. Using infrastructure to unlock net zero
 - *accelerating the implementation of the British Energy Security Strategy to update the mandate of Ofgem, creating the Future System Operator and accelerating the connection of cheaper renewables such as solar and onshore wind*
 - *developing a cross-sectoral infrastructure strategy by 2025 supporting the building and adaptation of infrastructure for electricity, hydrogen, other liquid and gaseous fuels and CO2 networks that support the green economy*
 - *reforming our approach to planning, so that where locally supported, more solar and onshore wind can be developed more easily, helping communities reap the benefits of cheaper low-carbon electricity*
 2. Creating sustainable governance structures for net zero
 - *developing an over-arching government financing strategy by the end of 2023*
 - *establishing an Office for Net Zero Delivery, responsible for placing net zero delivery at the heart of government thinking*
 3. Backing businesses to go green
 - *reviewing incentives for investment in decarbonisation, including via the tax system and capital allowances, and protecting British industries from environmental undercutting by progressing plans on carbon leakage measures and providing more detail on the UK's new Emissions Trading Scheme (ETS)*



- *building skills needed for the transition by driving forward the Green Jobs Taskforce recommendations and launching a 'Help to Grow Green' campaign, offering information and support to SMEs to plan and invest in the transition*
4. *Catalysing local action*
 - *reforming the planning system at local and national level to place net zero at its heart*
 - *back at least one Trailblazer Net Zero City, local authority and community, with the aim for these places to reach net zero by 2030*
 5. *Increasing transparency and engaging people*
 - *expanding the government's public reporting on net zero*
 - *ramping up public information through a new engagement plan, a new carbon calculator on the carbon cost of choices, and a standardised approach to ecolabelling on products*
 - *developing a Net Zero Charter mark, acknowledging 'best in class' among firms for their work in reaching net zero*
 6. *Delivering cleaner, cheaper, greener homes*
 - *legislating for the Future Homes Standard, meaning no new homes will be built with a gas boiler from 2025, and for all homes sold to be EPC C by 2033*
 - *adopting a 10-year mission to make heat pumps a widespread technology in the UK and legislate for the end of new and replacement gas boilers by 2033 at the latest*
 - *reforming EPC ratings to create a clearer, more accessible Net Zero Performance Certificate (NZPC) for households*
 7. *Capitalising on international leadership*
 - *conducting a strategic review on the UK's international climate leadership and introduce environmental and climate protections in future free trade agreements, removing trade barriers to environmental goods and services*
 8. *Setting ourselves up for 2050 and beyond*
 - *ramping up investment in research and development (R&D), with a new net zero R&D and technologies roadmap up to 2050, supporting up to 3 10-year demonstrator projects.*

UK Energy Security Strategy (2022)

- 3.37. On 7 April 2022, the Government published the UK Energy Security Strategy, a direct response to the energy market position following the significant spikes in energy prices resulting from the COVID-19 pandemic and Russia's invasion of Ukraine. Following the reopening of the global economy after the impacts of the COVID-19 pandemic, the sudden surge in demand for everything from foreign holidays to new cars has driven a significant

spike in the demand for oil and gas, and consequentially greatly increasing the price of these fossil fuels. This was compounded following the Russian invasion of Ukraine and the restrictions placed on Russian gas to the European market, which has resulted in prices increases.

- 3.38. Fuel prices is at the forefront again with as soaring energy prices are driven by the Middle East conflict.
- 3.39. The published Energy Security Strategy highlights the urgent need to both develop an energy system which is more self-sufficient and further accelerate the Country's transition away from oil and gas. The Strategy reiterates how Government will ensure a more flexible, efficient network system for both generators and users by encouraging the deployment of renewable energy generation technologies such as Solar PV and encouraging all forms of flexible electricity storage systems to balance the overall system and reduce overall costs of electricity.
- 3.40. It is acknowledged that this transition is not a fast process and is critically dependant on the speed at which we can deploy new renewable energy technologies. The UK Energy Security Strategy outlines the urgent need for the rapid deployment of a range of renewable technologies including on and off-shore wind, nuclear, solar and other technologies. It is acknowledged that net zero targets cannot be sustainably met through the exploitation of only one or a few technologies and requires the exploitation of all available renewable technologies. For ground mounted solar technologies, the new Energy Security Strategy states that the Government will:

...consult on amending planning rules to strengthen policy in favour of development on non-protected land, while ensuring communities continue to have a say and environmental protections remain in place. We will continue supporting the effective use of land by encouraging large scale projects to locate on previously developed, or lower value land, where possible, and ensure projects are designed to avoid, mitigate, and where necessary, compensate for the impacts of using greenfield sites.

The Growth Plan 2022, UK Government (September 2022)

- 3.41. The UK Government Growth Plan published on 23rd September 2022 reinforces the Government's commitment to the delivery of renewables within the UK to increase resilience.

The Energy Price Guarantee, UK Government (Updated November 2022)

- 3.42. The Energy Price Guarantee describes that *"Learning from the mistakes of the past, the government is taking action to accelerate domestic energy supply, increase our energy resilience and achieve our ambition to make the UK an energy exporter by 2040"* to include the need to *"drive forward the acceleration of new sources of energy supply"* including from solar.

Powering Up Britain: Energy Security Plan (March 2023)

- 3.43. The Government published a suite of documentation under Powering Up Britain in March 2023, including the Energy Security Plan, a revised Overarching National Policy Statement for Energy (“EN-1”) and a revised National Policy Statement for Renewable Energy Infrastructure (“EN-3”).
- 3.44. This included the Energy Security Plan (“ESP”). It is noted that the Government states that:
- “Low cost renewable generation will be the foundation of the electricity system and will play a key role in delivering amongst the cheapest wholesale electricity in Europe” (Page 34).*
- 3.45. The ESP continues to examine the role of solar over pages 37/38, and it reaffirms the Government’s commitment to aim for 70GW of ground and rooftop capacity by 2035. It restates earlier commitments that this amounts to a fivefold increase on current installed capacity. The ESP then concludes on this matter:
- “We need to maximise deployment of both types of solar to achieve our overall target.”*
- 3.46. The Government is therefore clear that the deployment of ground mounted solar (as well as roof mounted solar) needs to be maximised if the fivefold increase in deployment is to be met.
- 3.47. After considering ways that rooftop solar can be encouraged, the ESP turns to ground mounted solar, which is noted as being readily deployable at scale (as is the case with the Proposed Development). It continues to say that the Government ‘seeks’ large scale solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land.
- 3.48. The ESP again restates that the Government considers that meeting energy security and climate change goals is “urgent” and “of critical importance to the country,” and further that *“these goals can be achieved together with maintaining food security for the UK.”*
- 3.49. The ESP further encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental management.
- 3.50. The conclusion is reached in the ESP that that *“the Government considers that there is a strong need for increased solar deployment.”*

Connections Action Plan (November 2023)

- 3.51. The Department for Energy Security & Net Zero and Ofgem jointly published the Connections Action Plan in November 2023 and the Ministerial Foreword explains that over the last five years the volume of connection applications to the transmission network has grown approximately tenfold and this has led to an average delay of over five years for projects applying to connect to the transmission network. It goes on to say that this impacts the ability to decarbonise the energy system, roll out low carbon technologies and attract investment to the UK (page 5).

Clean Power 2030 Action Plan: A New Era of Clean Electricity (December 2024)



- 3.52. The UK Government published its Action Plan for Clean Power by 2030 in December 2024 and states that its successful delivery will require rapid deployment of new clean energy capacity across the whole of the UK.
- 3.53. The Action Plan highlights that achieving clean power is now a broader goal and key to growing the economy and improving national security and standards of living. The document identifies urgency of enacting policy by **“Sprinting to clean, homegrown energy”**, placing delivering clean power by 2030 at the heart of one of the Prime Minister’s five missions and the Plan for Change (page 6).
- 3.54. The Action Plan follows the Government’s commissioning of expert advice from the National Energy System Operator (NESO) and builds on that advice, setting out the need to **“move fast and build things to deliver the once in a generation upgrade of our energy infrastructure Britain needs”** (page 7). The Government’s summary identifies a requirement for rapid deployment of new clean energy, setting a high ambition for 2030 of **“43–50 GW of offshore wind, 27–29 GW of onshore wind, and 45–47 GW of solar power, significantly reducing our fossil-fuel dependency.** (Page 10)
- 3.55. The Action Plan outlines three major challenges as being **“the need for a secure and affordable energy supply, the creation of essential new energy industries, supported by skilled workers in their thousands, the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change.”** There is a clear link made between the steps to address energy security and climate change and the potential economic benefits from employment and investment in the energy industry, assisting the national plan for growth. The document (at page 20) refers to the Clean Power 2030 action plan **“Playing a key part in supporting hundreds of thousands of jobs, as part of the wider transition to net zero”**.
- 3.56. The Action Plan states that “Government will work with industry to unlock barriers and will take an innovative approach. Additionally, it is important that government looks at a clean power system beyond 2030, where demand is expected to increase” (page 130).
- 3.57. The Applicants note that with regard to Planning specifically, the Action Plan requires:

“Accelerating clean infrastructure projects through the planning system is critical to achieving our goal and unleashing investment to support the Prime Minister’s Growth Mission. Our capacity range will ensure that planners and statutory consultees at the national and local level have a clear sense of which projects to prioritise for consideration and, where appropriate, fast-track through the process to enable decisions on consent to be taken sooner” (Page 36).
- 3.58. Under the Summary for the Planning & Consenting section in the Action Plan, there is the stark acknowledgment that: **“Our current planning systems across Great Britain are not working at the pace required to meet our target for clean power by 2030... Lengthy paperwork and often-delayed processes for infrastructure projects hinder our energy security, our economic growth, and fails to deliver for the natural environment. The increased risks to projects associated with delays in planning decisions also increase costs across the system”** (page 50).
- 3.59. It continues: **“Our planning system needs to quickly change to enable government’s missions to grow the economy and deliver clean power. Since July, the government has**

taken decisive steps towards making planning work better for clean power and economic growth... We must go further. Processes are not suitable nor are examining authorities well-equipped to deal with the increase in new clean power projects and wider infrastructure that we expect in the coming years to achieve government's missions. There is particular urgency to accelerate the planning process across Great Britain for energy infrastructure since we do not have long for many clean power projects to begin construction if they are to be operational for 2030, especially networks and offshore wind developments" (page 50).

- 3.60. In considering the above, it is considered this latest Action Plan published by the Government continues to strongly advise that there is a critical need for rapid deployment of solar power, which the Proposed Development is well-placed to provide, subject to securing DNS planning permission to allow it to proceed.

Solar Roadmap: United Kingdom Powered by Solar (June 2025).

- 3.61. The UK Solar Roadmap was issued in June 2025 and outlines a strategy to accelerate solar deployment from 18GW to 45–47GW by 2030, with potential to exceed this target. It emphasises the role of solar in reducing energy costs, enhancing energy security, and tackling climate change while creating up to 35,000 jobs. The actions raised to address key challenges include reforming the planning systems, boosting rooftop solar adoption, addressing grid connection challenges, supporting innovative technologies, and ensuring ethical supply chains. The Roadmap also highlights the importance of skills development, community engagement, and collaboration across government, industry, and local stakeholders to achieve clean power goals.
- 3.62. The UK Solar Roadmap sets out a range of illustrative plausible scenarios to highlight the potential of solar deployment relative to the 45–47GW ambition set out in the Clean Power Action Plan. These scenarios cover all types of solar, including large-scale ground-mount, commercial and domestic rooftop for the period up to 2035. These scenarios demonstrate that reaching the Clean Power 2030 range is achievable, but will require significant action.
- 3.63. The UK Solar Roadmap provides a breakdown of illustrative 2030 solar capacity by sub-group and scenario (GW). This demonstrates that whilst additional solar capacity could be provided through domestic and commercial rooftop installations, particularly if certain policy barriers are removed, the main growth in solar capacity will be from large scale solar development.

4. Application Site and Its Surroundings

- 4.1. The Site is located on land near Great Harmeston Buildings, Pembrokeshire and has an area of approximately 128 hectares (“ha”), incorporating cable routes.
- 4.2. The Site is located entirely within the administrative boundary of Pembrokeshire County Council (PCC), on land near Great Harmeston Buildings, Pembrokeshire, SA62 3HM. The village of Johnston lies immediately north, village of Steynton (1.1km) south and Milford Haven (2.9km) south of the Site. The Site comprises of fields predominantly for arable use, bound by a mixture of mature woodland, trees, hedgerows, fencing, tracks, road and a railway line.
- 4.3. The Site is segregated by two ‘A’ roads and a railway line, a number of land parcels are located to the west of the A4076 Milford Road, with further land located between the A4076 and A477 (which is bisected by the Transport for Wales (TfW) railway line), and additional fields located on land to the west of the A477 (also bisected by the TfW railway line). There are 11 access points (Access A to K) to the land parcels within the Site, of which 10 are existing accesses. These separate access points are owing to the presence of the TfW railway line.
- 4.4. The A4076 Milford Road routes between Haverfordwest and the A40 in the north and Milford Haven in the south. It is a trunk road maintained by Welsh Government / Traffic Wales. In the vicinity of the site, it forms the northern and southern arm of the ‘Sunnycroft’ roundabout at the site’s northern boundary.
- 4.5. The A447 routes between the A40 at St Clears to the west and the ‘Sunnycroft’ Roundabout to the west. It forms the eastern arm of the ‘Sunnycroft’ roundabout and bisects the eastern parcel of the site.
- 4.6. The surrounding landscape is a mixed rural and urbanising setting, within the immediate area agricultural fields are interspersed with pockets of urban features. This includes the village of Johnston to the north of the Site, the local road network (A4076 Milford Road and A477). A Solar Farm is located south of Tiers Cross, 0.5km west of the Site. The adjoining area to the Site primarily consists of non-built-up land and agricultural land. The Site is surrounded by multiple unused artificial landscapes and industrial/manufacturing units located to the southeast and east. Residential buildings are located to the southeast, east, south, and northeast. Nearby, the Johnston Community Primary School is 0.94 km to the east, and Milford Haven School is 1.72 km to the south.
- 4.7. The Site will be served from the A4076 Milford Road to the north via Haverfordwest for construction, operation and decommissioning purposes which has onward connections to the A40/A48 and M4. There are a number of separate access points into the Site owing to the land parcels being segregated by the A4076 and A477.

Landscape

- 4.8. The Site does not fall within any statutory landscape designations and is not within the Green Belt. The Site forms part of the undulating landform and largely slopes from the north / north east around Johnston at c. 75 m AOD descending into a narrow and wooded valley near Great Harmeston and Hayston Bridge / Lower Hayston reaching c. 30 m – 40 m along



its southern edge. The eastern part of the Site slopes east descending to c. 60 m AOD along its eastern edge.

- 4.9. The field enclosures within the Site are medium scale delineated by well maintained hedgerows with occasional gaps and low trimmed sections. Woodland is prevalent in narrow incise valleys that mark the Site's western part and its southern edge. This woodland forms a continuous line of vegetation extending from the north western edge of the Site, across its western part and then runs along its southern edge, and then continuing south east past Rosemarket towards the valley of Westfield Pill.
- 4.10. There are no public rights of Way (PRoWs) within the Site except for Public Footpath PP81/1, which lies adjacent to the southern-eastern parcel of the Site and comes inside the Site boundary for a very small section along its route.
- 4.11. Pembrokeshire Coast National Park is located approximately 4km east and west of the Site at its nearest points. The park encompasses a diverse coastal landscape, including dramatic cliffs, sandy beaches, and the Milford Haven waterway. The theoretical visibility of the Proposed Development (bare earth) extends towards Robeston Cross on the outskirts of the oil refinery but does not breach the boundary of the National Park within the preliminary study area. The eastern areas of the National Park are more distant with theoretical visibility largely terminating on the higher ground around Rosemarket and not breaching this part of the National Park either.
- 4.12. The Site falls into Pembrokeshire County Landscape Character Assessment Landscape Character Area (LCA) 9: Johnston Lowlands. The LCA is located in central Pembrokeshire south of Haverfordwest, north of Milford Haven and west of the Western Cleddau and Daugleddau where it extends to the National Park Boundary.
- 4.13. The LCA is a rolling plateau landscape of gentle hills and wooded valleys. Farmland is dominated by high quality pastoral agriculture with hedgebanks and some arable, rough grassland and woodland blocks. The area is interspersed with scattered village settlements and farmsteads some of which have a strong historic character such as Rosemarket or Llangwm linked by quiet rural lanes. Busy A roads run north south, the A4076 and A477, between Haverfordwest to the north and Milford Haven and Pembroke Dock to the south.
- 4.14. Johnston is the largest settlement and hosts both commercial and industrial/business uses. The area to the east is more tranquil and rural in character closer to the Western Cleddau, Daugleddau and the National Park. Views south to the Haven are dominated by refineries and wind turbines and pylons in places and solar farms lie to the south west.

Cultural Heritage

- 4.15. The Site is not located within any statutory and / or non-statutory designated sites for cultural heritage or archaeology. The Site is not within or adjacent to a Conservation Area. A Scheduled Monument of a prehistoric burnt mound lies adjacent to the northern boundary of the site – Heneb ref. 3347.
- 4.16. One non-designated historic asset is located within the site: a linear earthwork in the south-eastern part of the site, which the Historic Environment Record (HER) states has been used recently as a farm track but may have its origins in a prehistoric defensive boundary feature – Heneb ref. 33149.

- 4.17. A high-level review of Heneb (Dyfed Archaeological Trust) HER of non-designated historic assets within a 1km radius of the site has been carried out. The vast majority of assets recorded by the HER within the study area are of post-medieval date and comprise buildings and features recorded on the First and Second Edition Ordnance Survey maps of 1871 and 1908 respectively. From the initial review of currently available information, no overriding archaeological constraints to the proposed development have been identified.
- 4.18. No designated historic assets are recorded within the site, but some designated heritage assets are recorded close to the site's boundaries and include:
- There is 1 Scheduled Monument within a 1km radius of the site: *Burnt Mound 170m S of Jubilee Cottages* – Cadw ref. PE476. Its southern boundary abuts the northern boundary of the north-western part of the site.
 - There is 1 Registered Historic Park and Garden within a 1km radius of the site: the Grade II *Great Harmeston* – Cadw ref. PGW(Dy)19(PEM).
- 4.19. There are 10 Listed Buildings within a 1km radius of the site, as follows:
- Grade II Listed *Upper Harmeston*, within the area excluded from the site boundary in the north – Cadw ref. 82698;
 - Grade II Listed (two separate Listings) *Hayston Bridge*, c.50m south of the south-eastern part of the site – Cadw refs. 82524, 83218;
 - Grade II Listed *Hayston Hall, Lofted Outbuilding at Hayston Hall, and Courtyard of Outbuildings at Hayston Hall*, c.220m, c.250m and c.270m south of the southern cable route of the site – Cadw refs. 83215, 83216, 83217;
 - Grade II Listed Great Harmeston and Long Agricultural Range to W of Great Harmeston House, including Cartsheds and Food Processing Store, c.90m and c.100m south of the southern boundary of the site – Cadw refs. 13052, 13053;
 - Grade II Listed *Milepost near Redstock Bridge*, c.160m south of the south-western part of the site – Cadw ref. 82696; and
 - Grade II* Listed *Church of St Peter* at Johnston, c.530m north of the northern boundary of the site – Cadw ref. 11996.
- 4.20. The Outstanding Registered Historic Landscape of Milford Haven Waterway covers an area of 204 square kilometres; a very small part of it extends into the southern part of the study area, to within c.35m of the south-western part of the site.

Ecology and Biodiversity

- 4.21. There are no statutory or non-statutory sites designated for nature conservation located within the Site or adjacent to it.
- 4.22. The closest statutory nature conservation designations within 3km of the Site include:
- Scoveston Fort SSSI (circa 2.3km south east)

- Milford Haven Waterway SSSI (circa 3km south east of the Site)
- Pembrokeshire Marine Special Area of Conservation (SAC) (circa 3km south east of the Site).

4.23. The Site predominantly comprises a mix of arable land, improved grassland (cattle grazed) and silage production bounded by species poor (blackthorn and hawthorn dominated) hedgerows and hedgerow and trees. There are a number of ponds, ditches and waterways primarily around the site boundary as well as some woodland blocks.

4.24. There are no areas of Ancient Woodland within the Site, but discrete pockets of Ancient Woodland are dispersed in the wider area.

4.25. Foraging habitats such as hedgerows, field margins and grassland are present across the Site. A detailed description of all species are presented within the Environmental Statement Chapter 7: Ecology

Air Quality

4.26. The Site does not lie within an Air Quality Management Area (AQMA) and is not adjacent or within close proximity to any other AQMA.

Ground Conditions and Agricultural Land

4.27. The Site is not known to have any contaminated land although there is a historic landfill named Hayston covering a small proportion of the southeast area of the Site.

4.28. The majority of the geology at the Site is underlain by the Rosemarket Formation of the Silurian period, consisting of interbedded sandstone and argillaceous rocks.

4.29. The hydrogeology consists of solid geology beneath the Site designated as a Secondary B Aquifer (Rosemarket Formation) and a Secondary Aquifer (Milford Haven Group). The Site is not within a Source Protection Zone, however, is within an area identified as 'high' for groundwater vulnerability.

4.30. An Agricultural Land Classification survey (ALC) has been carried out for the Application Site and is to be submitted as part of the wider DNS application. The ALC is verified by Land Quality Assessment Service² (LQAS) confirming the Site consists of a mix of Grades 2, 3a, 3b, 4 and non-agricultural land although the Site is predominantly low grade (Grade 3b, 4) agricultural land. The ALC calculations confirm the majority of the development footprint within the Site consists of Grade 3b and Grade 4 (non Best and Most Versatile (BMV) Land) land which constitutes almost 80% of the Site.

² LQAS is the specialist service within the Welsh Government that validates Agricultural Land Classification (ALC) surveys

Hydrology

- 4.31. The Flood Map for Planning Rivers Dataset produced by Natural Resource Wales (NRW) shows that the majority of the Site is located in Flood Zone 1 (lowest risk). There are some small areas along the southern boundaries of the Site which are located within Flood Zone 2 and 3. There is no proposed infrastructure within areas of Flood Zone 2 and 3.
- 4.32. The Flood Map for Planning Sea dataset (NRW) shows that the entire Site is located in Flood Zone 1 and therefore there is no tidal flood risk on Site.
- 4.33. The Flood Map for Planning Surface Water and Small Watercourses dataset (NRW) shows that the majority of the Site is in Flood Zone 1. There are some Flood Zone 2 and 3 flow paths located within the Site, however these are mainly associated with existing watercourses on Site.
- 4.34. There are no Main Rivers located within the Site according to DataMapWales³ and the closest Main River, known as 'Merlins Brook' is located approximately 1.8km north of the Site. There are several Ordinary Watercourses along the boundaries of the Site and through western portions of the Site.

³ <https://datamap.gov.wales/maps>

5. Planning Policy Context

- 5.1. This section of the Statement identifies the national and local planning policy and guidance pertinent to the development proposal and development site. The plan led approach to development as enshrined by Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to accord with the adopted development plan unless material considerations indicate otherwise.
- 5.2. In the case of DNS schemes, Planning Policy Wales, at paragraph 5.75, states *“Planning applications for onshore generating projects in Wales which have an installed generation capacity of between 10MW and 350MW (there is no upper limit for onshore wind generating stations) are made directly to the Welsh Ministers under the Developments of National Significance (DNS) process and considered under policies in Future Wales”*.
- 5.3. Accordingly, as a DNS project, the main policy consideration for the assessment of Great Harmeston Solar Farm is the relevant policies set out in **Future Wales**. The local development plan and Planning Policy Wales are material consideration.
- 5.4. Planning Policy Wales explains how material considerations could include current circumstances, planning policies of the Welsh Government⁴ and job creation⁵. It goes on to state how factors to be taken into account in making planning decisions (material considerations) must be planning matters; that is, they must be relevant to the regulation of the development and use of land in the public interest, towards the goal of sustainability⁶.
- 5.5. Whether a particular consideration is material in any given case will depend on the circumstances. Planning Policy Wales gives some guidance on what material considerations are. They must be genuine planning matters, that is, they must be relevant to the regulation of the development and use of land in the public interest, towards the goal of sustainability.

Future Wales: The National Plan 2040 (February 2021)

- 5.6. Future Wales provides a spatial context for facilitating the delivery of development in Wales over the next 20 years and constitutes the development plan for DNSs in line with section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 5.7. Future Wales will be used to guide both public and private investment. Welsh Government’s aim is to ensure investments and developments – whether large or small in scale – contribute to the broader ambitions of the Welsh Government and to the well-being of communities. Therefore, Future Wales will influence how communities develop over the next 20 years and it is important that we have a comprehensive understanding of the positive and negative effects this could have as the plan developed. Future Wales is the national development framework for Wales and has development plan status.
- 5.8. Page 15 of Future Wales identifies how Future Wales does not contain statements on all land use matters, but it provides specific policies on issues which the Welsh Government

⁴ Planning Policy Wales paragraph 3.1.3

⁵ Ibid paragraph 10.2.11

⁶ Ibid paragraph 3.14

considers them to be a national policy at this time, it goes on to state “deciding where to locate renewable energy generation technology is a spatial issue of such significance that national ambitions are unlikely to be achieved without national planning policies”.

- 5.9. Schemes qualifying as energy Developments of National Significance (DNS) must be determined in accordance with Policy 18 of Future Wales. This point is expanded on further below. The First Minister of Wales’s Ministerial Foreword makes an early and important reference to the climate emergency faced by Wales. There is a recognised need for Wales to focus on generating the energy it needs to support its communities and industries over the next twenty years. This message is repeated in the Foreword by the Minister for Housing and Local Government which states (inter alia) “this Government is committed to supporting and delivering more active travel and sustainable transport infrastructure, new renewable energy schemes, improved digital communications infrastructure and new public services and facilities. In all these areas our decisions can contribute towards decarbonisation, healthy and active lifestyles, a resilient and diverse environment and increased economic prosperity and fairness”.
- 5.10. *In the ‘Introduction’ to Future Wales, achieving decarbonisation and climate-resilience are noted as being one of the “key national priorities” for Wales; indeed Future Wales only includes policies “on issues where the Welsh Government considers a national priority at this time, or matters which are distinctly spatial and require national leadership. For example, ...deciding where to locate renewable energy generation technology is a spatial issue of such significance that national ambitions are unlikely to be achieved without national planning policies.” It also acknowledges that Wales faces a climate emergency.*
- 5.11. *It is clear that delivering renewable energy is one of the Welsh Government’s top national priorities for the next 20 years. Future Wales sets out 11 outcomes that can be achieved by 2040 provided the planning system is focused on the long-term and provides quality development in the right places for the right reasons.*
- 5.12. The application proposal would contribute towards outcome 9, 10 and 11, these are:-
- 5.13. **Outcome 9 – A Wales where people live in places that sustainably manage their natural resources and reduce pollution.** Wales’ natural resources, including its minerals, soils and geodiversity, coast, water, forests and landscape support a range of activities and sectors and are assets of great value in their own right. The environmental, social and cultural value of our resources will be managed, maintained and enhanced, while economic benefits will be utilised sustainably and appropriately by promoting nature-based solutions and a circular economy. Across Wales the risks of flooding and coastal erosion will be effectively managed and mitigated while better resource choices will be reflected in more sustainable places. Places will benefit from reduced pollution and be healthier and more liveable.
- 5.14. **Outcome 10 – a Wales where people live in places with biodiverse, resilient and connected ecosystems.** The variety of flora and fauna found across Wales make Wales a special place. Biodiversity underpins the functioning of healthy, resilient ecosystems and the multiple benefits they provide. While biodiversity has declined in recent decades, we will reverse these losses and enhance the resilience of ecosystems. The planning system will ensure wildlife is able to thrive in healthy, diverse habitats, both in urban and rural areas, recognising and valuing the multiple benefits to people and nature

- 5.15. **Outcome 11 – a Wales where people live in places which are decarbonised and climate-resilient** The challenges of the climate emergency 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 commitments and renewable energy 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. New homes will be energy efficient and will help communities adapt to the changing climate.
- 5.16. Future Wales sets a clear direction of how Wales should be investing in infrastructure and development for the greater good of Wales and its people – the provision of renewable energy is firmly embedded to this future direction. In terms of the specific policies in Future Wales, Policies 17 and 18 contain strategic spatial and detailed criteria-based policies respectively and should be considered together in the determination of applications, along with detailed advice on assessing benefits and impacts in Planning Policy Wales.
- 5.17. Policy 17 states (own emphasis underlined):

Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure

The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs. In determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency. In Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in policy 18. Applications for large-scale wind and solar will not be permitted in National Parks and Areas of Outstanding Natural Beauty and all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment. Proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities. New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities. The Welsh Government will work with stakeholders, including National Grid and Distribution Network Operators, to transition to a multi-vector grid network and reduce the barriers to the implementation of new grid infrastructure.

- 5.18. Policy 18 provides a decision-making framework for renewable and low carbon energy technologies. Policy 18 states:

Renewable and Low Carbon Energy Developments of National Significance Proposals for renewable and low carbon energy projects (including repowering) qualifying as Developments of National Significance will be permitted subject to policy 17 and the following criteria:

- outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty);
- there are no unacceptable adverse visual impacts on nearby communities and individual dwellings;
- there are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and appropriate compensatory measures have been secured);
- there are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species;
- the proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity;
- there are no unacceptable adverse impacts on statutorily protected built heritage assets;
- there are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance;
- there are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA-7T);
- there are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation;
- the proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources;
- there are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration. The cumulative impacts of existing and consented renewable energy schemes should also be considered.

5.19. The amplification to policies 17 and 18, at page 96 of Future Wales, identifies how *“Wales is abundant in opportunities to generate renewable energy and the Welsh Government is committed to maximising this potential. Generating renewable energy is a key part of our commitment to decarbonisation and tackling the climate emergency”*. It goes on to state how *“As set out in legislation, applications for Developments of National Significance must be determined in accordance with Future Wales, which is the national development plan for Wales”*

- 5.20. Policy 17 recognises the wealth of current and emerging renewable energy technologies that can contribute towards our energy and decarbonisation targets. It also demonstrates the Welsh Government’s support in principle for all renewable energy projects and technologies. Proposals should ensure there is no significant unacceptable detrimental impact on the surrounding natural environment and local communities and that the development delivers positive social, environmental, cultural and economic benefits.
- 5.21. On the issue of alternatives, page 97 of Future Wales states (inter alia) *“The Welsh Ministers have considered alternatives to the need for new large-scale electricity generation infrastructure, including building-mounted installations and energy efficiency measures. Although we believe that these measures have an important part to play in meeting our energy, decarbonisation and climate change targets, they will not enable us to meet these objectives on their own”*.
- 5.22. It is clear that Policy 18 is the starting point when considering renewable energy Developments of National Significance. This provides that renewable energy DNS schemes will be permitted subject to Policy 17 and the criteria listed in Policy 18 itself.
- 5.23. Turning to the regional approach, Future Wales locates the application site within the south west catchment area. The published document, at page 153, sets out how the provision of renewable energy is vital for the south west to play its role in decarbonising. It states (inter alia) ***“It is vital the region plays its role in decarbonisation and supports the realisation of renewable energy. Policies 17 and 18 set out Future Wales’ approach to renewable energy generation across Wales. There is strong potential for wind, marine and solar energy generation and Strategic and Local Development Plans should provide a framework for generation and associated infrastructure. The Welsh Government wishes to see energy generation, storage and management play a role in supporting the South West economy”***.
- 5.24. Through Policy 9 of Future Wales, the Welsh government will seek to ensure that actions towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets are demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.
- 5.25. Policy 5 of Future Wales, the Welsh Government seeks to strongly supports development of innovative and emerging technology businesses and sectors to help rural areas unlock their full potential, broadening the economic base, and creating higher paid jobs.

Planning Policy Wales (Ed, 12 published February 2024)

- 5.26. The primary objective of Planning Policy Wales (PPW) is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places. PPW promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities.

- 5.27. PPW sets out five key principles which underpin Welsh Government's approach to sustainable development; these are: -
- **Growing our economy in a sustainable manner** - The planning system should enable development which contributes to long term economic wellbeing, making the best use of existing infrastructure and planning for new supporting infrastructure and services.
 - **Making best use of resources** - The efficient use of resources, including land, underpins sustainable development.
 - **Facilitating accessible and healthy environments** - Our land use choices and the places we create should be accessible for all and support healthy lives.
 - **Creating & sustaining communities** - The planning system must work in an integrated way to maximise its contribution to well-being.
 - **Maximising environmental protection and limiting environmental impact** - Natural, historic and cultural assets must be protected, promoted, conserved and enhanced.
- 5.28. Section 3 of PPW sets out the priority for strategic and spatial choices. Paragraph 3.1 considers that (own emphasis in bold) *"Effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the formulation of a development plan, or when developing specific proposals. **The policy issues should not be considered in isolation from one another.**"*
- 5.29. With regards to placemaking in the rural areas, paragraph 3.38 of PPW identifies how (inter alia) *"Fostering adaptability and resilience will be a key aim for rural places in the face of the considerable challenge of maintaining the vibrancy of communities and availability of services as well as contributing to the Cohesive Communities well-being goal. This is coupled with ensuring the countryside is resilient to the impacts of climate change and plays a role in reducing the causes of climate change through the protection of carbon sinks and as a **sustainable energy source** in line with the Resilient Wales well-being goal".*
- 5.30. In regard to Best and Most Versatile Agricultural Land, Paragraph 3.59 sets out that: *'When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations.'*
- 5.31. Paragraph 3.61 under the heading of 'Supporting Infrastructure' identifies how adequate and efficient infrastructure such as electricity is crucial for economic, social and environmental sustainability. Paragraph 3.63 goes on to state: *"Development should be located so that it can be well serviced by existing or planned infrastructure. In general this will involve maximising the use of existing infrastructure or considering how the provision of infrastructure can be effectively co-ordinated to support development plans. Infrastructure choices should support decarbonisation, socially and economically connected places..."*

5.32. Section 5 sets out the economic components of placemaking and Welsh Government vision here is to achieve productive and enterprising placemaking and well-being. Welsh Government outcomes for productivity and enterprise include:

- manages water resources naturally;
- reduces overall pollution;
- resilient to climate change;
- makes best use of natural resources;
- prevents waste;
- adaptive to climate change;
- fosters economic activity;
- embraces smart and innovative technologies;
- good connections;
- appropriate development densities;
- minimises the need to travel;
- not car dependent; and
- vibrant and dynamic.

5.33. Page 76 of PPW identifies how places which are productive and enterprising contributes to the seven goals of the Well-being of Future Generations (Wales) Act 2015 which includes the following.

- A **Prosperous Wales** can be achieved through increased economic activity across all sectors and at all scales. This is realised through the availability of employment land, lifelong learning and training opportunities, reliable communication networks and investment in renewable and low carbon energy sources. Resource efficient choices are promoted which have financial benefits both now and over the lifetime of development.
- A **Resilient Wales** is supported by our agriculture and tourism industries and through the beauty of our natural, built and historic environment. Tourism development, which can finance preservation activities, needs careful management to ensure continued enjoyment by future generations. Sustainable agricultural practices can also assist in nature conservation and enhancement. Wales' topography also lends itself to renewable energy generation.
- A **Healthier Wales** can be achieved through the reduction in emissions and air pollution as a result of generating energy from non-carbon sources. Greater distribution of our economic wealth can also help alleviate poverty which is a key determinant of health.

- A more **Equal Wales** can be achieved through promoting sufficient employment and enterprise opportunities for people to realise their potential and by recognising and building on the existing economic strengths of places to assist in delivering prosperity for all.
- **Cohesive Communities** are created by people who have access to fulfilling work which is easily reached locally through sustainable transportation infrastructure and who can communicate effectively and safely with their friends and neighbours.
- A **Vibrant Culture** and thriving Welsh Language are supported by the provision of jobs and economic activity which needs to be strategically planned and managed. The Welsh language and culture makes a distinctive contribution to the viability of communities. Our tourism offer also needs promotion to capitalise on and support activities which reflect our distinctiveness.
- Above all, a **Globally Responsible Wales** is promoted by reducing our carbon footprint through integrated public transportation infrastructure, encouraging globally responsible business and the promotion of renewable energy over carbon-emitting sources and resource choices through which multiple benefits can be realised.
- Development should **prevent** problems from occurring or getting worse such as the generation of carbon emissions, poor air quality and waste and the depletion of our natural resources which will need to be managed for many years to come
- Development should be **integrated** to ensure that common issues are considered and accommodated early on, such as equipping our homes and businesses with the necessary digital and physical infrastructure and ensuring we have the right natural resources to do so.
- **Collaboration** is necessary to strategically plan for our employment, energy, waste and mineral needs. These are areas where 'larger than local' issues need to be addressed by planning authorities with the involvement of other agencies and communities to ensure sustainable outcomes are delivered across Wales.

5.34. Page 77 of PPW sets out the Welsh Government trends and issues in the productive and enterprising places, these include:

- ensuring that there is sufficient employment land to meet the needs and requirements of a range of future employment scenarios (including increased automation and the significant contribution of SMEs to the Welsh economy) whilst ensuring that an over-supply of employment land does not prevent the release of land for other uses;
- promoting and diversifying our rural economy to ensure it is fit for the future and economically sustainable while ensuring that unnecessary development in the countryside is controlled;
- embracing the challenge of decarbonising our energy and transport sectors including phasing out of fossil fuels and moving towards local, decentralised renewable energy systems, the increased use of energy storage to balance supply and demand and the challenge this creates on our distribution networks

- supporting and enabling training, education, infrastructure, construction and manufacturing capacity to support progress towards a circular economy; and
- supporting and enabling renewable, low carbon globally responsible material choices and their efficient and most appropriate use, so as to prevent waste and ensure finite resources are not unnecessarily diminished.

5.35. Page 77 to 78 of PPW sets out the Welsh Government position on how policy topics of the Productive and Enterprising Places theme can collectively work together to create sustainable places through development plan strategies, policies and allocations and development management decision making. These include: –

- encouraging policies and proposals which promote low carbon developments and sites for renewable energy, manufacturing, research and development close to areas of deployment of renewable energy
- promoting the economic benefits of energy schemes and in particular supporting those developments which maximise planning-related benefits to communities;

5.36. Subsection 5.4 on economic development includes Paragraph 5.4.2 which recognises that: “Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services. The construction, energy, minerals, waste and telecommunications sectors are also essential to the economy and are sensitive to planning policy.” The paragraph goes on to identify how the Welsh Government strongly supports growth in renewable end low carbon proposals.

5.37. Section 5.7 of PPW specifically relates to Energy.

5.38. Paragraph 5.7.12 identifies how **“Overall power demand is expected to increase as a result of growing electrification of transport and heat. In order to ensure future demand can be met, significant investment will be needed in energy generation, transmission and distribution infrastructure. The system will need to integrate renewable generation with storage and other flexibility services, in order to minimise the need for new generation and grid system reinforcement. Collectively we will need to concentrate on reducing emissions from fossil fuel sources, whilst driving further renewable generation which delivers value to Wales”**.

5.39. Paragraph 5.7.3 identifies how **“These priorities contribute to reducing carbon emissions, as part of our approach to decarbonisation, whilst enhancing the economic, social, environmental and cultural well-being of the people and communities of Wales, in order to achieve a better quality of life for our own and future generations. This means taking precautionary action to prevent Wales being ‘locked in’ to further fossil fuel extraction and high carbon development”**.

5.40. Paragraph 5.7.6 identifies how **“The planning system should secure an appropriate mix of energy provision, which maximises benefits to our economy and communities whilst minimising potential environmental and social impacts. This forms part of the Welsh Government’s aim to secure the strongest economic development policies, to underpin growth and prosperity in Wales, recognising the importance of**

decarbonisation and the sustainable use of natural resources, both as an economic driver and a commitment to sustainable development”.

- 5.41. Paragraph 5.7.7 goes on to state how the benefits of renewable and low carbon energy, as part of the overall commitment to tackle climate change is of '**paramount importance**' to the Welsh Government. It goes on to state how the planning system should: –
- maximise renewable and low carbon energy generation; and
 - optimise energy storage.
- 5.42. Renewable energy targets are discussed at paragraph 5.7.14 of PPW, to recap the Welsh Assembly will seek that: –
- for Wales to generate 70% of its electricity consumption from renewable energy by 2030; and
 - for one Gigawatt of renewable electricity capacity in Wales to be locally owned by 2030.
- 5.43. Subsection 5.9 provides support for renewable and low carbon development. Paragraph 5.9.1 states *“Local 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.”*
- 5.44. Paragraph 5.9.14 sets out how *“Planning authorities should support and guide renewable and low carbon energy development to ensure their area’s potential is maximised. Planning authorities should assess the opportunities for renewable and low carbon energy in the area, and use this evidence to establish spatial policies in their development plan which identify the most appropriate locations for development”*. Paragraph 5.9.15 goes on to identify how outside identified areas, *“planning applications for renewable and low carbon energy developments should be determined based on the merits of the individual proposal. The local need for a particular scheme is not a material consideration, as energy generation is of national significance and there is a recognised need to optimise renewable and low carbon energy generation. Planning authorities should seek to ensure their area’s renewable and low carbon energy potential is achieved and have policies with the criteria against which planning applications outside of identified areas will be determined”*.
- 5.45. Paragraph 5.9.21 states *“Prior to an application being submitted, developers for renewable and low carbon energy developments should, wherever possible, consider how to avoid, or otherwise minimise, adverse impacts through careful consideration of location, scale, design and other measures”*.
- 5.46. Section 6 of PPW deals with the themes of planning policy topics covering landscape, historic environment, biodiversity, geodiversity and habitats, coastal characteristics, air quality, soundscape, water services, flooding and other environmental (surface and sub-surface) risks.
- 5.47. With regards to the historic environment, paragraph 6.1.9 seeks that *“Any decisions made through the planning system must fully consider the impact on the historic environment*

and on the significance and heritage values of individual historic assets and their contribution to the character of place.”

5.48. Section 6.2 of PPW deals with green infrastructure. Paragraph 6.2.4 states how green infrastructure plays a fundamental role in shaping places and our sense of well-being, and is intrinsic to the quality of the spaces we live, work and play in. It goes on to state how the planning system must maximise its contribution to the protection and provision of green infrastructure assets and networks as part of meeting society’s wider social and economic objectives and the needs of local communities. The key requirements are

- Green Infrastructure: stronger emphasis on taking a proactive approach to green infrastructure covering cross boundary considerations, identifying key outputs of green infrastructure assessments, the submission of proportionate green infrastructure statements with planning applications and signposting Building with Nature standards.
- Net Benefit for Biodiversity and the Step-wise Approach: further clarity is provided on securing net benefit for biodiversity through the application of the step-wise approach, including the acknowledgement of off-site compensation measures as a last resort, and, the need to consider enhancement and long-term management at each step. The importance of strategic collaboration to identify and capture larger scale opportunities for securing a net benefit for biodiversity is recognised.
- Protection for Sites of Special Scientific Interest: strengthened approach to the protection of SSSIs, with increased clarity on the position for site management and exemptions for minor development necessary to maintain a ‘living landscape’. Other development is considered unacceptable as a matter of principle. Exceptionally, a planned approach may be appropriate where necessary safeguards can be secured through a development plan.
- Trees and Woodlands: closer alignment with the stepwise approach, along with promoting new planting as part of development based on securing the right tree in the right place.

Pembrokeshire County Council Local Development Plan 2013 – 2021

5.49. Pembrokeshire County Council’s (“PCC”) Local Development Plan (“LDP”) was adopted on 28th February 2013 (excluding the area of the Pembrokeshire Coast National Park). Pembrokeshire County Council commenced its review of its LDP in May 2017, and the emerging revised Local Development Plan 2017–2033 has currently reached the examination stage. Reference is made to page 15 of Future Wales which states how Local Development Plans must be in conformity with Future Wales.

5.50. Key policies of the extant local development plan pertinent to this type of development are:

- SP 1 Sustainable Development.
- SP 10 Transport Infrastructure and Accessibility.
- 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.35 Protection of Open Spaces with Amenity Value.
- GN.37 Protection and Enhancement of Biodiversity.
- GN.38 Protection and Enhancement of the Historic Environment.

5.51. Each Policy is discussed in turn below: –

5.52. Policy GN.4 relates to Resource Efficiency and Renewable and Low-carbon Energy Proposals and seeks to support proposals for renewable energy. The policy notes that the generation of the use of renewables will rise over the local plan period and the Welsh Government has demonstrated that it will play a vital role in meeting the growing energy demands.

5.53. This policy highlights a number of different renewable sources of energy, including solar panels. The impact on the landscape of the chosen renewable input will be a material consideration for determining these applications. The design should demonstrate that sustainability and energy reducing principles are at the centre of the proposal.

5.54. Other development plan policies pertinent to the development are:

5.55. Policy SP 1 establishes sustainable development as the core principle guiding the land-use across Pembrokeshire. It seeks to balance social, economic and environmental principles.

5.56. Policy SP 10 supports improvements to the local transport network, while also promoting accessibility and sustainable travel options. It seeks to integrate development with efficient highway infrastructure.

5.57. Policy SP 11 seeks to ensure sustainable waste management by encouraging waste minimisation, reuse, and recycling. It supports the provision of appropriate waste facilities aligned with national waste strategies.

5.58. Policy SP 16 seeks to protect countryside areas from unjustified development while enabling rural business and infrastructure. It promotes the protection of the landscape and sustainable rural living. The amplification of the policy, at paragraph 5.86, identifies how energy-related developments in the countryside would be considered under the General Policies on development

5.59. Policy GN 1 requires development to be compatible with its surroundings and to avoid unacceptable harm to amenity, landscape, biodiversity, transport as well as public safety. Development should be of a high-quality design and appropriately located.

- 5.60. Policy GN 2 confirms that development proposals should be of a high-quality design that respects the local character while also being responsive to the changing climate. Proposals should be accessible and demonstrate good placemaking.
- 5.61. Policy GN 3 ensures that new development is supported by the required infrastructure, including transport, utilities, education and community facilities. Proposals should avoid overloaded existing services, and where that is unavoidable, they should provide enhancements.
- 5.62. Policy GN 10 supports the diversification projects that allow farms to remain economically viable that are appropriately scaled and compatible with rural character. This should assist with broadening rural income sources while safeguarding the environment.
- 5.63. Policy GN 22 requires that valuable mineral resources be extracted prior to development taking place when feasible.
- 5.64. Policy GN 25 establishes buffer zones to protect communities and sensitive uses from impacts of mineral operations and ensures that new development does not constrain existing or future mineral extraction.
- 5.65. Policy DN 35 This policy protects parks, green spaces, and other open areas that contribute to community wellbeing. Development that would harm their recreational or visual value is restricted.
- 5.66. Policy GN 37 requires development to avoid an adverse impact to biodiversity, and proposals should provide enhancements where possible.
- 5.67. Policy GN 38 states that heritage assets such as listed buildings, conservation areas and archaeological sites should be protected. Development should conserve and enhance historic assets.
- 5.68. The *Pembrokeshire Supplementary Planning Guidance – Renewable Energy (2016)*, is further guidance which supports Policy GN.4 from the adopted local plan. It seeks to ensure that the proposal balances energy generation benefits with environmental protection.

6. Planning Assessment

- 6.1. This section of the Statement contains a detailed analysis of the application proposal against the relevant material and planning policy considerations. These considerations have been derived from an understanding of the application site and its surroundings, as well as the policy analysis of the previous section and the legislative background set out in Section 3.

Principle of Development

- 6.2. Future Wales is the national development framework, setting the direction for development in Wales to 2040, and forms part of the development plan alongside the Local Development Plan, and in time, Strategic Development Plans when they are adopted. Future Wales' strategy is to address key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems, and improving the health and well-being of our communities.
- 6.3. Future Wales is the highest tier of development plan in Wales and local development plans *"are required to be in conformity with Future Wales and must be kept up to date to ensure they and Future Wales work together effectively."* (p.8 and p.15). In addition, Future Wales provides (at p.10) that *"The specific purpose of Future Wales is to ensure the planning system at all levels is consistent with, and supports the delivery of, Welsh Government strategic aims and policies."* This is a legal requirement, as the local development plan must be in conformity with Future Wales under s.62(3A) of the Planning and Compulsory Purchase Act 2004.
- 6.4. Policies 17 and 18 of Future Wales provide the framework for the consenting of renewable energy DNS schemes in Wales.
- 6.5. Policies 17 and 18 of Future Wales are clear that achieving decarbonisation and climate-resilience is one of the **"key national priorities"** for Wales, and Future Wales recognises the need for Wales to focus on generating the energy it needs to support its communities and industries over the next twenty years. The proposed development is for a solar farm which will power the **equivalent of approximately 34,444 homes** and **displace around 11,532 tonnes of CO₂ per year**⁷. Therefore, through policies 17 and 18, Future Wales supports the principle of the proposal and its potential to contribute to the national priorities of decarbonisation and climate-resilience.
- 6.6. At paragraph 1.2, the PPW identifies its primary objective as being to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural being of Wales as required by the Well-being of Future Generation (Wales) Act 2015. There is no dispute that the proposed development will increase Wales' installed renewable energy capacity, contributing to meeting local and national renewable energy targets, reducing reliance on

⁷ Source: Homes: 65MWac / 2700kWh (average UK home) = 34,444. CO₂: 65MWac solar scheme based on a reasonable expected yield of 1,000 kWh/kWp/year and a carbon intensity of 0.124 kg CO₂/kWh per the 2023 BEIS dataset = 11,532

energy generated from fossil fuels and thus actively facilitating the transition to a low carbon economy. To this end, the proposed development would achieve the WBFG Act goals to build a globally responsible, prosperous and resilient Wales. The WBFG goals are further explored in section 7 of this Statement.

- 6.7. Policy 17 states that decision-makers should give '**significant weight**' to the urgent need to meet the target of generating 70% of consumed electricity by renewable means by 2030. This is part of Wales' international commitment to combating climate change. Further to this, Policy 17 prohibits the development of DNS schemes where they will cause significant visual impact. Additionally, Policy 17 also dictates that applicants must present the benefits to the local community brought about by the development. The benefits include the wider benefits of renewable energy which include security of energy supply and reduced energy costs for the consumer. Benefits of the project are to be realised through reduced energy bills and security of supply which will reduce Wales' exposure to the volatility of the wholesale energy markets. These are important factors in addressing fuel poverty, which disproportionately affects low-income households across Wales and contributes to economic inequality. The proposal would reduce reliance upon overseas energy sources. The energy production would help to meet the national and local need for energy and therefore the development would fulfil an important social role.

How the development accords with Policy 18 of Future Wales

- 6.8. Policy 18 specifically relates to qualifying energy Developments of National Significance and presents 11 principles which should be satisfied to secure consent. The requirements set out in Policy 18 are considered in turn below.

Criteria 1: Outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty)

- 6.9. The site is not located within a statutory protected landscape designation such as a National Park or National Landscape of national importance. The proposal would inevitably change the character of the site from undulating pastoral farmland to a solar PV development, however, the arrangement of the proposed solar farm responds positively to the landform and field pattern with the existing hedgerow vegetation being retained and strengthened, where appropriate, meaning that overall no unacceptable adverse impact will be caused in this regard. Landscape and visual considerations are fully assessed within Chapter 5 of the Environmental Statement which accompanies the statutory pre-application consultation.

Criteria 2: There are no unacceptable adverse visual impacts on nearby communities and individual dwellings

- 6.10. ***Chapter 5 Landscape and Visual*** of the Environmental Statement has undertaken an assessment of the development's impacts on nearby residential and community receptors. With regards to reciprocal views towards the site, the ES confirms that: -

- Views from within the Site do not appear to include the land within the National Park.

- Views looking west include the nearby operational Solar Site and its immediately surrounding fields, some 2 – 3 fields away from the western edge of the Site, but the rising topography around Tierson curtails views and the land then falls away from the Site. Similarly, looking east the localised higher ground extending between Johnston and Rosemarket – marked by the Old Rosemarket Road, and then towards Trooper’s Inn on the edge of the preliminary 3 km study area, curtails views of the low lying areas of the National Park around the Western Cleddau.
- Looking north from the Site’s western parcel, the built form in Lower Bulford and Sunnyhill along Bulford Road Diversion come in and out of the view along with some of the dwellings in the south western part of Johnston – those along Bulford Close and at the A4076 / Milford Road Roundabout. The background is formed of an undulating agricultural landscape and views terminate on this higher ground – the southern slopes of Bolton Hill around the Water Treatment Works / quarry and edge of the settlement. With regards to the central parcel, views from its northern edge looking north are interrupted by the A477 roadside hedgerow. Dwellings along the A477 (small cul-de-sac at Ayston View) terminate the views with their first floor windows clearly visible over the roadside hedgerow. The eastern parcel abuts a number of residential dwellings to the north (Fairviews and No. 44), and here the inter-visibility is high with views direct and with little in the form of vegetative screening. The Old Rosemarket Road is vegetated and separates the Site’s eastern parcel from the landscape north and north east.
- Looking south and south west, particularly from the elevated northern areas of the Site’s western parcel, views are distant and include the distant residential development on the eastern edge of Steynton (c. 70 m AOD), parts of which are still under construction and that towards Milford Haven. In the distance, large-scale wind turbines are evident, depending on the weather conditions. The contrast and verticality of the oil refinery infrastructure are quite stark. These features, however, read as being part of a different landscape and are not associated with the core study area. The vegetation along the A477 / Neyland Road helps define the distant skyline, with a tree group enclosing its large lay-by, easily identifiable on the horizon.
- With regards the Site’s eastern parcel, Rosemarket is visible in the distance with Hill Mountain identifiable on the distant elevated horizon. The lower lying medium range landscape, and indeed much of The Old Rosemarket Road, is screened or the level of inter-visibility is heavily restricted. The elevated section of the A477 at Sentry Cross is visible on the rising horizon and this higher ground continues west towards Steynton, segregating the core study area and wider countryside from the more distant and heavily transformed coastal landscape around Milford Haven.

6.11. In the evaluation of the effects on views and the visual amenity of the identified residential receptors, the magnitude of visual effect (change) is typically described with reference to:

- Distance of property from the Development having regard to its size / scale and location relative to the property (e.g. on higher or lower ground);
- Type and nature of the available views (e.g. panoramic, open, framed, enclosed, focused etc.) and how they may be affected, having regard to seasonal and diurnal variations;

- Direction of view / aspect of property affected, having regard to both the main / primary and peripheral / secondary views from the property;
- Extent to which the Development / landscape changes would be visible from the property (or parts of) having regard to views from principal rooms, the domestic curtilage (i.e. garden) and the private access route, taking into account seasonal and diurnal variations;
- Scale of change in views having regard to such factors as the loss or addition of features and compositional changes including the proportion of view occupied by the Development, taking account of seasonal and diurnal variations;
- Degree of contrast or integration of new features or changes in the landscape compared to the existing situation in terms of form, scale and mass, line, height, colour and texture, having regard to seasonal and diurnal variations;
- Duration and nature of the changes, whether temporary or permanent, intermittent or continuous, reversible or irreversible etc.; and
- Mitigation opportunities – consider implications of both embedded and potential further mitigation.

6.12. The proposed layout incorporates a number of built-in mitigation measures such as reduction in the extent of the proposed solar modules and refinements to the layout to provide physical separation from the nearby residential properties, and public highways, this is most notable along the northern edge of the proposed development.

6.13. For the reasons set out above, it is considered that with the development in place, there would be no unacceptable adverse visual impacts on nearby communities and individual dwellings. Accordingly, the proposal does not conflict with the requirements of criteria 2 of Policy 18 of Future Wales.

Criteria 3 – There are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and appropriate compensatory measures have been secured)

6.14. Internationally designated sites comprise Ramsar sites, Special Areas of Conservation (SAC's), Special Protection Areas (SPAs), and Biosphere Reserves. There are six designated sites located within 10km of the application site, and three sites are considered relevant to the ecological baseline, these are: –

- Pembrokeshire Marine Special Area of Conservation (SAC), located approximately 2.8–3.8 km to the south, designated for a range of marine habitats and species including estuaries, reefs and marine mammals, with potential indirect impact pathways via hydrological connectivity, water quality and impacts to functionally linked land;
- Cleddau Rivers SAC, located approximately 6.0 km north east of the Site, designated for a range of aquatic and terrestrial habitats and species including, but not limited to, bogs, different species of lamprey (*Lampetra* sp. and *Petromyzon*

sp.), and otters, with potential indirect impact pathways via impacts on functionally linked land utilised by otter;

- Limestone Coast of South West Wales SAC, located approximately 8.2 km to the south, designated for its coastal and terrestrial habitats and plant species, in addition to greater horseshoe bat. With potential indirect impacts pathways via impacts on functionally linked land utilised by greater horseshoe bat;

- 6.15. These statutory sites were scoped into further assessment, within Chapter 7 of the Environmental Statement, due to the presence of potential ecological or hydrological linkages and credible indirect impact pathways, with detailed consideration of effects on both international and national designations informed by the Screening Shadow Habitats Regulations Assessment, which is presented as a technical appendix to the Environmental. The salient points of the ES with regards to international sites are set out below: –
- 6.16. The Proposed Development has been designed to avoid direct impacts to all internationally designated sites identified within the ecological baseline. No land take will occur within any designated site boundary.
- 6.17. Buffers have been incorporated into the scheme design to protect retained boundary habitats, watercourses and riparian corridors, thereby maintaining ecological connectivity and reducing the risk of disturbance or pollution pathways linking the Site to designated features.
- 6.18. In relation to hydrologically linked sites, particularly Pembrokeshire Marine SAC, the design avoids works within waterbodies and incorporates drainage control measures, habitat buffers and pollution prevention infrastructure to minimise the potential for sediment run-off, changes in water quality or accidental contamination.
- 6.19. For the majority of internationally designated sites, no direct construction-related impacts are anticipated due to the distances involved, the absence of physical habitat loss, and the lack of credible disturbance pathways linking the Site to these receptors. These sites are therefore not expected to experience significant effects during construction. However, Pembrokeshire Marine Special Area of Conservation (SAC) are hydrologically connected to the Site via surface water catchments. In the absence of appropriate pollution control and surface water management measures, there is potential for construction-related impacts to functionally linked land through sedimentation, chemical pollution, habitat removal, noise, artificial lighting, and vehicle movement, in addition to hydrological impacts through sedimentation and chemical pollution, to affect downstream water quality and associated qualifying features, including habitats supporting otter and estuarine ecological communities.
- 6.20. As there are no adverse effects on the integrity of internationally designated sites, no mitigation measures are required, and the proposal is in accordance with Criteria 3 of Policy 18.

Criteria 4 – there are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species

- 6.21. Turning to national sites, two Sites of Special Scientific Interest (SSSIs) are considered relevant to the ecological baseline, these are: –
- Scoveston SSSI – located approximately 2.3km to the south east of the site. The site is designated for greater horseshoe bat. As this SSSI partially falls under the same designation as Limestone Coast of South West Wales SAC (greater horseshoe bat), the same applicable pressures and threats should be considered for Scoveston Fort SSSI. Therefore, when discussing Limestone Coast of South West Wales SAC, Scoveston Fort SSSI should be considered covered.
 - Milford Haven Waterways SSSI – located 4km to the south of the site. The site is designated for its extensive estuarine and coastal habitats, including mudflats, saltmarsh, rich marine assemblages and migratory fish. As this SSSI is located within and covered by the Pembroke Marine SAC, the same pressures and threats are considered applicable to both sites. Therefore, when discussing Pembroke Marine SAC, Milford Haven Waterways SSSI should be considered covered.
- 6.22. Turning to habitats, the proposed development has been progressed using a stepwise approach to retain ecologically important habitats wherever practicable, particularly hedgerows with trees, woodland edges, ponds and the riparian corridor, which provide the principal ecological value and connectivity across the Site. The arable land and improved and modified grassland within the Site, which are of low sensitivity and limited ecological value, have been selected for development. This approach minimises impacts on higher value habitats while allowing the retention of boundary features that provide the primary ecological function of the Site. Areas of purple moor-grass and rush pastures have largely been retained within the Site layout, particularly where these occur adjacent to hedgerows, woodland and the riparian corridor, maintaining their function as damp grassland habitat and foraging areas for wildlife. Small areas of improved and modified grassland in the southern part of the Site will be retained where practicable, with the remainder developed.
- 6.23. Broadleaved woodland within and adjacent to the Site has been largely avoided through the layout design. Only very limited areas in the south-western part of the Site may be affected where the cable route follows existing farm tracks through woodland compartments, thereby minimising new fragmentation and disturbance. The majority of woodland habitat will remain intact and buffered from development.
- 6.24. In addition to the retention of the majority of existing woodland blocks and woodland edge habitats, the Proposed Development includes the creation of new woodland planting as part of the site layout. A new planting belt approximately 20 m in width is proposed along the northern boundary of the Site, which will strengthen habitat connectivity, provide additional screening and contribute to long-term ecological enhancement. This new woodland will link with existing boundary features and reinforce the wider woodland network within the local landscape.
- 6.25. Species-rich hedgerows with trees, species-poor hedgerows, and associated boundary vegetation have been retained across the Site as key ecological corridors. Limited widening of existing access points will be required in small sections of hedgerow to facilitate construction and operational access. Where hedgerow gaps are present these will be replanted with native species to restore continuity and strengthen the hedgerow network over time.

- 6.26. The on-site watercourse and associated riparian corridor have been retained within the Site layout, with development set back at 20m buffer to maintain its function as a linear ecological corridor. Only very limited works are anticipated in woodland sections where the cable route crosses existing tracks. Boundary ditches associated with hedgerows will benefit from the retention of adjacent vegetation and the provision of undeveloped buffer zones, helping to maintain hydrological function and habitat quality.
- 6.27. Further areas of biodiversity-focused planting are proposed across the Site as part of the landscape and green infrastructure framework, subject to the final detailed landscape design. This will include the strengthening of field boundaries, infilling of hedgerow gaps and the creation of additional planted corridors and habitat areas designed to improve structural diversity and ecological connectivity. The precise composition and extent of this planting will be confirmed within the Landscape and Ecological Management Plan (LEMP) and Green Infrastructure Statement.
- 6.28. These embedded design measures significantly reduce the extent of habitat loss of ecologically valuable habitats, fragmentation and disturbance and form the primary means of avoiding significant ecological effects.

Bats

- 6.29. The retention of boundary habitats, hedgerows, woodland edges and the riparian corridor provides embedded mitigation for bat species by preserving key commuting and foraging routes used across the Site. The scheme layout incorporates undeveloped buffer areas between solar infrastructure and these linear features, including a minimum separation distance in areas where bat activity was recorded, thereby reducing disturbance and maintaining habitat functionality for more sensitive species such as barbastelle.
- 6.30. Limited hedgerow removal identified within the Arboricultural Impact Assessment is localised and does not sever key commuting corridors. The majority of linear features remain intact and continuous across the Site, maintaining connectivity for bat movement through the wider landscape.
- 6.31. Although some loss of sub-optimal foraging habitat will occur where arable land is converted to solar infrastructure, most affected areas currently provide limited bat foraging value. Higher quality foraging habitats, including purple moor-grass and rush pastures and neutral grassland and boundary features, will be retained, and habitat creation beneath and around the arrays will enhance foraging resources in the long term.

Breeding Birds & Winter Birds

- 6.32. Retention of boundary habitats, grassland areas and open foraging space within the Site provides continued winter foraging opportunities for farmland bird assemblages. Construction disturbance will be temporary and spatially limited, with alternative foraging habitat widely available within the surrounding agricultural landscape.
- 6.33. With specific regard to skylarks, all areas of grassland within the site boundary that are not to be panelled will be used for skylark mitigation, the areas underneath the panels would be enhanced to provide foraging habitats and this would be maintained for the lifetime of the scheme. Currently, these areas comprise of modified grasslands and arable fields, and they will be managed post-development to enhance their suitability for skylarks. In total there

will be c. 12.3 ha made available for nesting compensation for the lost territories, and assuming 2 territories are present in each hectare, this is a ratio of 1.89:1 based on the lost territories. The creation and appropriate management of new foraging areas, and the addition of the new nesting habitat are expected to compensate for the loss of 13 onsite probable territories.

Badger

- 6.34. The scheme layout has been informed by the location of three active badger setts recorded within or adjacent to the Site. Infrastructure has been positioned to avoid direct impacts to sett entrances, and no permanent development is proposed within sett locations.
- 6.35. The majority of hedgerows, woodland edges and boundary vegetation used by commuting and foraging badger will be retained, maintaining established movement corridors across the Site and into the wider landscape. Solar infrastructure has been set back from woodland blocks and boundary features to reduce fragmentation and maintain ecological connectivity.
- 6.36. By retaining these key habitat features and incorporating spatial separation from identified setts, the Proposed Development has been designed to minimise disturbance and avoid direct impacts to badger at the layout stage.

Dormouse

- 6.37. Suitable dormouse habitat within the Site is associated with interconnected native hedgerows (including hedgerows with trees), woodland edges and the riparian corridor. The scheme layout retains the majority of these linear and edge habitats, ensuring continued habitat connectivity across the Site and into the wider landscape.
- 6.38. Only limited and localised hedgerow removal is required to facilitate access widening and infrastructure installation, and the overall network of connected woody vegetation will remain intact. The retention of these corridors maintains potential dispersal routes and foraging habitat for dormouse, thereby reducing the risk of habitat fragmentation through design.

Otter

- 6.39. The on-site watercourse and associated riparian corridor have been retained within the Site layout, with development set back behind an undeveloped buffer zone. No permanent infrastructure is proposed within the channel, and the layout avoids direct modification of the watercourse.
- 6.40. By retaining and buffering the riparian corridor, the scheme maintains its function as a commuting and foraging route for otter and preserves hydrological connectivity within the wider catchment. The use of existing track crossings for cable routing minimises new disturbance within woodland compartments and avoids unnecessary encroachment into riparian habitat.
- 6.41. These embedded design measures ensure that the ecological function of the watercourse corridor is maintained during operation

Reptiles and Amphibians

- 6.42. Habitats offering suitability for reptiles and amphibians, including hedgerows, woodland edges, scrub, areas of neutral grassland and purple moor-grass and rush pasture, have been largely retained within the scheme layout. These habitats form the principal areas of higher suitability for sheltering, foraging and dispersal.
- 6.43. Development has been directed toward intensively managed arable and modified grassland areas of lower ecological value, thereby reducing impacts on higher suitability habitats. Retention of boundary vegetation and habitat corridors maintains connectivity between suitable habitats within and adjacent to the Site.
- 6.44. By avoiding extensive clearance of higher-value edge and damp habitats, the scheme design minimises fragmentation and reduces the likelihood of significant impacts on reptiles and amphibians.

Other species

- 6.45. Suitable habitat for hedgehog is present within retained hedgerows, woodland edges, scrub and grassland margins across the Site. The scheme layout retains the majority of these boundary habitats, maintaining sheltering, nesting and foraging opportunities within and around the development footprint.
- 6.46. Ecological connectivity across the Site will be maintained through the retention of continuous hedgerow and woodland corridors. The proposed perimeter fencing design will incorporate ground-level gaps where appropriate, allowing continued movement of small and medium-sized mammals between retained habitats and adjacent land. The use of standard security fencing with clearance beneath panels also maintains permeability across the Site.
- 6.47. By retaining boundary habitats and maintaining landscape permeability, the development has been designed to minimise fragmentation and avoid severance of hedgehog commuting routes at the layout stage. Further details on the proposed mitigation and enhancement measures are presented in the Environmental Statement Chapter 8: Ecology which accompanies the pre-application consultation.
- 6.48. For the reasons set out above it is considered that the proposed development duly accords with the requirements of criteria 4 of Policy 18 Future Wales.

Criteria 5 – The proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity

- 6.49. The Environment (Wales) Act 2016, the Well-Being of Future Generations Act (Wales) 2015, and the Chief Planner's letter (30th December 2022) frame biodiversity with respect to its contribution to achieving "ecosystem resilience". The policy position was consolidated and reinforced through the publication of PPW 12 edition. The Environment (Wales) Act 2016 Section 6 duty is referenced throughout the national planning policy guidance.
- 6.50. As set out in the accompanying Green Infrastructure Strategy, the Proposed Development seeks to follow the Step-wise Approach.

Step 1: Avoid

- 6.51. The Proposed Development avoids direct impacts on all statutory designated sites for nature conservation. No designated sites are located within the Site boundary, and the scheme has been designed to ensure no direct loss or encroachment occurs in relation to nearby designated features identified within the Environmental Statement. Within the Site, the most important green infrastructure assets comprise the broadleaved woodland blocks, the watercourse and associated riparian corridor, ponds, Purple moor-grass and rush pasture area, hedgerow network and scattered mature trees. These habitats provide the primary ecological connectivity across the Site and support protected and priority species, including Section 7 species such as bats and skylark, as well as mammals including badger, dormouse, otter and hedgehog.
- 6.52. The masterplan layout has been informed by ecological constraints to avoid direct impacts on higher-value habitats wherever possible. All woodland blocks are retained in situ, with the creation of buffer zones of a up minimum of approximately 10 metres (and greater in many locations) to protect woodland edges and maintain ecological function. The watercourse itself is entirely avoided, with development infrastructure set back to preserve the integrity of the riparian corridor as a continuous wildlife movement route.
- 6.53. All ponds within the Site are retained and protected within the development layout, except Pond 1, which was confirmed as having been infilled prior to the updated walkover survey in February 2026. Retained ponds will remain integrated within the Site's green infrastructure network and buffered from development infrastructure.
- 6.54. Areas of Purple moor-grass and rush pasture are retained and protected within the scheme, recognising their higher ecological value relative to surrounding agricultural land. Solar arrays and associated infrastructure are focused primarily within arable land and modified grassland of lower ecological value, and within parts of other neutral grassland where impacts cannot be wholly avoided.
- 6.55. Known badger setts are avoided within the layout, with appropriate buffer zones maintained in accordance with best practice guidance. While construction activity will occur within the buffer of one sett, the sett itself will not be disturbed, and precautionary measures will be implemented through a final CEMP to prevent harm to badgers.

Step 2 Minimise

- 6.56. Where impacts on green infrastructure assets cannot be entirely avoided, the scheme has been designed to minimise effects through careful siting of access points, cable routes, inverter stations and internal tracks.
- 6.57. Localised losses of hedgerows and limited sections of the riparian corridor are restricted to small widening of existing entrances and narrow crossing points required for underground cabling. These interventions have been designed to be as narrow as practicable to retain overall habitat connectivity and minimise fragmentation.
- 6.58. Temporary disturbance to limited areas of other neutral grassland may occur during construction to facilitate the installation of infrastructure; however, these areas will be reinstated following works. Significant portions are retained within the Site and will be enhanced as part of the GI strategy.

6.59. A limited number of trees will be removed where necessary for access and infrastructure, with impacts minimised through alignment of tracks and avoidance of mature woodland blocks.

Step 3: Mitigate

6.60. Potential impacts arising during construction and operation will be mitigated through the implementation of a Construction Environmental Management Plan (CEMP), secured by planning condition. The CEMP will include pollution prevention and surface water management measures, sensitive methods of working, protection of retained habitats and buffer zones, and precautionary measures for protected and priority species.

6.61. Ecological mitigation measures form an integral part of the proposals, including the retention of woodland, hedgerows, ponds and riparian habitats, incorporation of native planting to strengthen habitat connectivity, and the maintenance of dark corridors along hedgerows and the riparian corridor to safeguard bat commuting and foraging routes.

6.62. Green infrastructure features such as habitat buffers, grassland creation areas and wetland enhancements have been located outside higher-value habitats and woodland edges, ensuring that ecological function is maintained while delivering additional biodiversity benefits across the Site.

6.63. Invasive non-native species will be managed through appropriate mitigation measures to prevent spread and safeguard the integrity of retained habitats and green infrastructure assets. Recorded stands of Japanese knotweed will be subject to a site-specific management strategy, including the establishment of buffer zones, biosecurity controls during construction, and treatment and/or removal by suitably qualified contractors in accordance with best practice guidance and relevant legislation.

Step 4 Compensation

6.64. Unavoidable losses of lower-value agricultural habitats, limited sections of hedgerows, small areas of riparian vegetation and scattered trees are compensated through a comprehensive programme of green infrastructure creation and enhancement, as illustrated on the Landscape Masterplan.

6.65. The compensation and enhancement strategy is designed to strengthen landscape connectivity, improve habitat condition and diversity, and deliver long-term biodiversity benefits in accordance with PPW12 objectives.

6.66. Key measures include:

Features	Description
Habitat creation and tree planting	Creation of areas of native biodiversity planting, including deep buffers along higher ground and adjacent to Public Rights of Way to the north of the Site, providing landscape screening, enhanced ecological connectivity and increased habitat extent;

	<p>Native planting to reinforce existing woodland blocks and strengthen the riparian corridor;</p> <p>Occasional large-scale native tree planting along Site boundaries and adjacent to Public Rights of Way to filter views, increase canopy cover and enhance habitat structure; and</p> <p>Replacement of trees removed as part of the development at a minimum ratio of 3:1, delivering a net gain in tree cover and long-term structural diversity.</p>
<p>Hedgerow restoration and creation</p>	<p>Infill planting of existing hedgerows across the Site at approximately a 30 percent infill rate to address gaps and improve habitat continuity;</p> <p>Extension of existing hedgerows to strengthen ecological connections between woodland blocks, ponds and the riparian corridor;</p> <p>Height management and reinforcement of key hedgerow sections to improve screening while maintaining permeability for wildlife movement; and</p> <p>Creation of new native hedgerows where required to further enhance connectivity and define the Site's green infrastructure network.</p>
<p>Grassland enhancement and creation</p>	<p>Management and enhancement of existing rush pasture to function as a dedicated skylark mitigation area</p> <p>Creation of tussocky grassland and wildflower-rich meadow habitats using appropriate native seed mixes (such as Emorsgate EM10 Tussock Meadow Mix or similar) to increase structural diversity and invertebrate value</p> <p>Establishment of species-rich meadow grassland across lower-value agricultural land using grazing meadow mixes (such as Emorsgate EM2 General Purpose Meadow Mix or similar) to replace and enhance areas of arable and modified grassland</p> <p>Retention and enhancement of areas of neutral grassland alongside new grassland creation to deliver a connected mosaic of open habitats</p>
<p>Riparian corridor enhancement</p>	<p>Strengthening of the riparian corridor through buffering with native woodland and grassland planting</p>

	Retention and enhancement of natural vegetation along the watercourse to improve habitat quality, connectivity and hydrological function Sensitive integration of crossing points for underground cabling to maintain ecological continuity
Ponds and wet features	Retention of all existing ponds within the Site (with the exception of Pond 1 which has been infilled prior to the updated walkover survey); Protection and enhancement of pond margins through native planting and habitat buffering to improve freshwater habitat networks
Species-specific enhancements	Delivery of skylark mitigation areas through targeted management of rush pasture and tussocky grassland habitats; Maintenance of dark corridors along hedgerows, woodland edges and the riparian corridor to support bat commuting and foraging; and Installation of bird and bat boxes within retained trees and woodland edges to provide additional nesting and roosting opportunities

6.67. Enhancements have been incorporated into the development design to benefit a range of species, while also improving habitat condition, structural diversity and ecological connectivity within the wider urban landscape.

6.68. The proposed ecological enhancements fit with the Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience and adaptability (DECCA) Framework⁸ by:

DECCA framework	Applicant's Response
Diversity	Ecological diversity across the Site will be significantly increased through the creation of new native planting biodiversity areas, restoration and infilling of hedgerows, enhancement of the riparian corridor, and the establishment of other neutral grassland, tussocky grassland and enhanced purple moor grass habitats. These measures will introduce greater botanical and structural diversity than is currently present within intensively managed

⁸ Garrett HM., and Ayling SC. (2021) Terrestrial and freshwater Resilient Ecological Networks: a guide for practitioners in Wales. 43 pp. NRW Report No. 483 Natural Resources Wales. Dolgellau. Available at: <https://cdn.cyfoethnaturiol.cymru/media/693356/resilient-ecologicalnetworks-practitioner-guide.pdf?mode=pad&rnd=132612537900000000>

	agricultural land, providing a wider range of resources for birds (including skylark), bats, invertebrates and mammals.
Extent	The extent of semi-natural green infrastructure across the Site will be expanded through the conversion of lower-value arable land and modified grassland into higher-quality grassland habitats, alongside substantial areas of new woodland planting and strengthened riparian buffers. Collectively, these measures increase the overall area of functional habitat and strengthen the Site's contribution to the wider landscape-scale green infrastructure network
Condition:	Habitat condition will be improved through targeted enhancement of existing features, including hedgerow restoration, riparian corridor buffering, pond margin protection and management of purple moor grassland for biodiversity benefit. Newly created habitats will be supported by appropriate establishment and long-term management regimes, secured through the planning process, to ensure favourable ecological condition is achieved and maintained.
Connectivity	Ecological connectivity will be maintained and enhanced through the retention of all woodland blocks, the watercourse and associated riparian corridor, and the majority of the hedgerow network, together with new hedgerow planting, woodland buffers and grassland corridors. These measures will strengthen movement routes for wildlife, particularly for bats, birds and riparian species, and improve linkage between habitats within the Site and the surrounding rural landscape.
Resilience and adaptability	Ecosystem resilience and adaptability will be supported through increased habitat diversity, expansion of woodland and tree cover, and the creation of semi-natural grassland and riparian habitats across the Site. These measures will improve the Site's capacity to support wildlife over the long term, provide greater structural variety within the landscape, and help habitats respond to environmental change. The retention and enhancement of the riparian corridor and purple moor grassland areas will also contribute to local hydrological function and habitat stability

6.69. For the reasons set out above, the scheme satisfies the requirements of Criteria 5 of Policy 18.

Criteria 6 – There are no unacceptable adverse impacts on statutorily protected built heritage assets

6.70. Chapter 6 of the Environmental Statement and its supporting Heritage Assessment considers cultural heritage. The chapter considers the potential effects upon the significance of Cultural Heritage receptors. Buried archaeological remains, earthworks,

structures, landscapes, and all other aspects of the historic environment have been considered. The salient points are summarised below.

- 6.71. The Site appears to contain hitherto unrecorded archaeological historic assets related to Bronze Age to Roman settlement, agricultural and, possibly, funerary activity. The Site appears to contain archaeological historic assets related to post-medieval farming known from historic maps. The significance of these assets derives from the evidential value of the archaeological deposits which comprise them and the way these document past agriculture. The value of any such assets is likely to be of at most local importance.
- 6.72. The proposed development is likely to cause harm to any archaeological historic assets present, as construction groundworks are likely to truncate or remove archaeological deposits within their footprint, should they be present. The level of harm will vary depending upon which element of the scheme they lie within. Harm is likely to be minimal, i.e. truncation only, in panel array areas due to their small and discrete pile footings. Harm in scheme elements with more extensive groundworks (e.g. substation, cabling) is likely to be greater. The areas of highest potential, containing concentrations of Bronze Age to Roman assets, lie mainly within panel arrays. As such, they are predicted to experience **limited disturbance** and, therefore, a **low level of harm**.
- 6.73. Harm to archaeological assets can be addressed by a programme of archaeological works. Without prejudice to any strategy eventually agreed with the Heneb (acting as archaeological advisors to the Pembrokeshire County Council (PCC)), this is likely to comprise at least some of the following elements:
- Trial trench evaluation;
 - Advance works, e.g. area excavation;
 - Construction period monitoring, e.g. watching brief on ground works.
 - Indirect Physical Effects
- 6.74. The Burnt Mound 170m S of Jubilee Cottages Scheduled Monument lies immediately adjacent to the northern boundary of the Site (SM ref. PE476). Groundworks for fencing and tracks are currently proposed c.10m south of the Scheduled Monument. Without implementation of control measures, it is possible that construction could result in incidental damage to the Scheduled Monument by, for example vehicle and spoil movements. Control measures and site induction information (e.g. toolbox talks) should avoid harm to the Scheduled Monument from this source.

Effects due to setting change

- 6.75. The following assets, or asset groups, were identified as potentially susceptible to effects due to setting change:
- Burnt Mound 170m S of Jubilee Cottages Scheduled Monument (SM ref. PE476).
 - Church of St Peter, Johnston (Grade II* Listed Building LB Ref. 11996).
 - Upper Harmeston (Grade II Listed Building, LB ref. 82698).

- Great Harmeston – two Grade II Listed Buildings (LB Refs. 13052, 13053) and a Grade II RHPG (RHPG Ref. PGW(Dy)19(PEM)).
- Hayston Hall – three Grade II Listed Buildings (LB Refs. 83215, 83216 & 83217).
- Hayston Bridge (Grade II, LB refs. 82524 & 83218).
- Milepost near Redstock Bridge (Grade II, LB ref. 82696).
- Milford Haven Waterway LOHI (RHL ref. HLW (D) 3).

6.76. Harm stemming from the setting change caused by the Proposed Development is likely to arise only to the Burnt Mound 170m S of Jubilee Cottages Scheduled Monument and the Upper Harmeston (Grade II Listed Building). This would likely be a **low level of harm**, which would cease upon decommissioning and removal of the project and the reinstatement of agricultural use. Upper Harmeston, as a Listed Building, is subject to the Town and Country Planning Act 1990 Section 314A. In terms of this act, the setting of the listed building would not be preserved as harm to its significance would arise from the change in setting.

6.77. For all other assets no harm would arise. This is either as the Proposed Development would not alter aspects of the asset's setting which contribute to their significance or as setting does not contribute to significance.

6.78. Overall, the proposed development is not considered to alter the setting of any of these assets. It would therefore not be contrary to Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act, 1990 and to the 'desirability of preserving an ancient monument and its setting' and the 'desirability of preserving the building, or its setting' of Planning Policy Wales; and criteria 6 of Policy 18 of Future Wales.

Criteria 7 – There are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance

6.79. Criteria 7 sets out the development management considerations for both wind and ground mounted solar. Shadow and flicker are constraint pertinent only to wind turbines and are therefore not relevant in relation to the proposed development.

6.80. Noise and vibration are considered through the Preliminary Noise Assessment which accompanies the pre-application consultation. The report has presented a preliminary assessment of the noise levels attributable to the operation of the solar farm at surrounding noise-sensitive properties, to enable potential constraints to be identified. The report has presented calculations and a preliminary assessment of the noise levels to be generated by the operation of the solar farm. The calculated noise levels have been assessed against relevant standards and guidance to identify any likelihood of adverse impacts. The preliminary assessment concluded that the operation of the solar farm would generate a low potential for adverse impacts at neighbouring noise sensitive properties. The assessment has identified areas where noise levels could be reduced to further reduce a potential for adverse impacts, which would be considered as the scheme is developed. Where possible, plant would be located well away from neighbouring properties, with acoustic fencing also to be considered around plant close to properties and the Applicant will take this into account when finalising the design post statutory consultation. The strategy will be to ensure that the design is developed such that all noise generating plant

is optimally located and distributed throughout the Site, such that acoustic effects at sensitive receptors are minimised. The preliminary results within this assessment will also be used to target baseline noise monitoring, which will be used to facilitate a full BS 4142 assessment, which will be prepared to accompany the main planning application.

- 6.81. With regard to the construction phase, a range of measures have been set out within the Outline CEMP, which will ensure that all construction noise and vibration effects will be kept to appropriate levels.
- 6.82. In terms of reflected light a 'Glint and Glare Assessment' has been undertaken to assess the potential impacts and is presented within Chapter 8 of the Environmental Statement. The study assesses the potential effects arising from the development on surrounding receptors, including road users, aviation and residents. The salient points are set out below.
- 6.83. For all dwellings surrounding the site, screening in the form of existing vegetation and topography is predicted to significantly obstruct views of reflecting panels such that solar reflections are not predicted to be experienced in practice. No impact is predicted, and mitigation is not required – however buffer zones are being provided in some areas which are free of solar infrastructure
- 6.84. For all sections of railway, screening in the form of existing vegetation is predicted to significantly obstruct views of reflecting panels such that solar reflections are not predicted to be experienced by road users in practice. No impact is predicted, and mitigation is not required.
- 6.85. Solar reflections are geometrically possible towards a 1.8km section of the A4076, 300m section of the Bulford Road Bypass, and a 1.5km section of the A477. A moderate impact is predicted on a 100m section of the A477 and a 100m section of Bulford Road Bypass due to solar reflections being predicted to originate from inside of a road user's primary horizontal field-of-view with existing vegetation not being predicted to significantly obstruct views. Mitigation is not required to make the development acceptable and screening is recommended as a potential enhancement. For 400m of the A4076 and 500m of the A477, screening in the form of existing vegetation and intervening terrain is predicted to significantly obstruct views of reflecting panels such that the remaining visible reflections originate from outside of a road user's primary horizontal field of view or are reduced to fleeting in nature, which coincide with direct sunlight. A low impact is predicted, and mitigation is not required. For all remaining sections of the A4076, Bulford Road Bypass and the A477, screening in the form of existing vegetation is predicted to significantly obstruct views of reflecting panels such that solar reflections are not predicted to be experienced in practice. No impact is predicted, and mitigation is not required.
- 6.86. Overall, no significant impacts are predicted upon residential amenity, railway operations and infrastructure, or aviation activity. No significant cumulative impacts are predicted. Mitigation is not required to make the development acceptable in terms of glint and glare considerations.
- 6.87. Turning to air quality considerations, the application site is not located near any Air Quality Management Area as per Wales Airborne Pollution Map. The construction impacts associated with the proposed development would likely generate a small magnitude of dust and PM10. Impacts from dust emissions during the construction phase would be not significant, which is supported by the low levels of annual mean emissions. It is considered

that despite there not being a defined risk present, it is still advisable that a number of good practice measures are implemented, such as considerate traffic speed and observing minimal dust dispersion wherever possible during construction and transport activities and these can be incorporated in a final Construction Environmental Management Plan.

- 6.88. Maintenance vehicles are only expected to visit the application site periodically. Therefore, it is unlikely that the number of vehicle movements during the operational phase will exceed those of the construction phase. As a result, operational phase impacts associated with road traffic emissions are deemed to be not significant. The Outline Construction Environmental Management Plan, details appropriate housekeeping and mitigation measures that would be followed at the construction and operational stages to minimise any adverse impact on air quality.
- 6.89. There are no designated ecological sites within relevant screening distances of the Development and therefore it is not necessary to consider the impact of construction dust. Impacts from dust emissions during the construction phase would not be significant, which is supported by the low levels of annual mean emissions. It is considered that despite there not being a defined risk present, it is still advisable that a number of good practice measures are implemented, such as the spraying of areas with water supplied as and when conditions dictate to prevent the spread of dust.
- 6.90. Maintenance vehicles are only expected to visit the application site periodically. Therefore, it is unlikely that the number of vehicle movements during the operational phase will exceed those of the construction phase. As a result, operational phase impacts associated with road traffic emissions are deemed to be not significant.
- 6.91. With regards to electromagnetic disturbance, all equipment that generates, distributes or uses electricity produces electric and magnetic fields (EMFs). The technical specifications of the proposed substation accompanying the application identifies how the proposed development complies with EMF exposure guidelines. The main potential source of interference is the substation. Solar panels and underground cables do not in general, produce any significant radio-frequency emissions. The substation would operate in accordance with the management practices of the DNO, when operating under a full load, the field levels located at the boundary of the compound would be significantly less than the EC Council Recommendation 1999 (EC 1999) Reference Levels which form the UK Guidance for electromagnetic field limits. Therefore, it is expected that the electromagnetic fields produced by the proposed development would not present a hazard to members of the public in accessible areas outside of the site boundary.
- 6.92. For the reasons set out above it is considered that the proposed development duly accords with the requirements of criteria 7 of Policy 18 Future Wales.

Criteria 8 – There are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA-7T)

- 6.93. As with shadow flicker, aviation and radar considerations are only pertinent to wind farms and as such are not relevant to this proposal. There are no identified defence facilities or operations within the vicinity of the site, and the scheme will not result in unacceptable impacts on the Mid Wales Low Flying Tactical Training Area (TTA 7T). Accordingly, there is no conflict with regard to criteria 8 of Policy 18 Future Wales.

Criteria 9 – There are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation

6.94. The application is supported by an Outline Construction Traffic Management Plan. The salient points of the report are set out below.

Construction Traffic

6.95. The designated route for all traffic associated with the construction phase will be to and from the A40 which is located to the north of the site, east of Haverfordwest. The A40 connects to the M4 (the closest motorway) further east. The proposed construction route is indicatively shown in Figure 2.1 and summarised below:

- Construction traffic will travel south onto A4076 Freemens Way from the A40/ Cartlett Road/ Freemens Way roundabout.
- Vehicles will continue along the A4076 Freemens Way before routing south onto the A4076 Dredgeman Hill from the A4076/ Pembroke Road/ A4076 Dredgeman Hill/ Caradog's Well Road/ Merlin's Hill roundabout (Merlins Bridge Roundabout).
- Traffic will route south along the A4076 Dredgeman Hill (which becomes Vine Road, St Peters Road and Milford Road), routing through Johnston before arriving at the Sunnycroft roundabout.
- Vehicles travelling to the Western Parcel (access A-D) will route south onto the A4076 Milford Road. Vehicles travelling to the Eastern Parcel (access E-K) will route east onto the A477.

6.96. There are no signed weight restrictions along the route. However, there is a signed height restriction of 4.8 metres for a bridge which crosses the A4076 Freemens Way approximately 280 metres south of the Merlins Bridge Roundabout. Deliveries to the site will therefore be made on vehicles which are of a suitable size to route beneath the bridge. No road closures will be required. Arriving and departing construction vehicles will only access the site via the designated construction route identified in the Outline CTMP. Use of this route for the temporary construction phase is considered appropriate. An appropriate signage scheme will be put in place for HGV drivers to follow between the A40 and the site. Drivers will be informed of the route prior to departing for the site and will be advised not to use sat-navs or online route planners.

Construction Phase

6.97. Construction is expected to take up to 9 months. The location of staff origin points is unknown at this stage, as it will depend on the appointed Contractor. However, it is anticipated that a non-local workforce could stay at local accommodation, for example, in Milford Haven or Haverfordwest, and general operatives could be transported to the site by minibuses to minimise the impact on the local highway network. The number of car trips to the site will be limited to senior staff, such as project managers and the Health and Safety Executive.

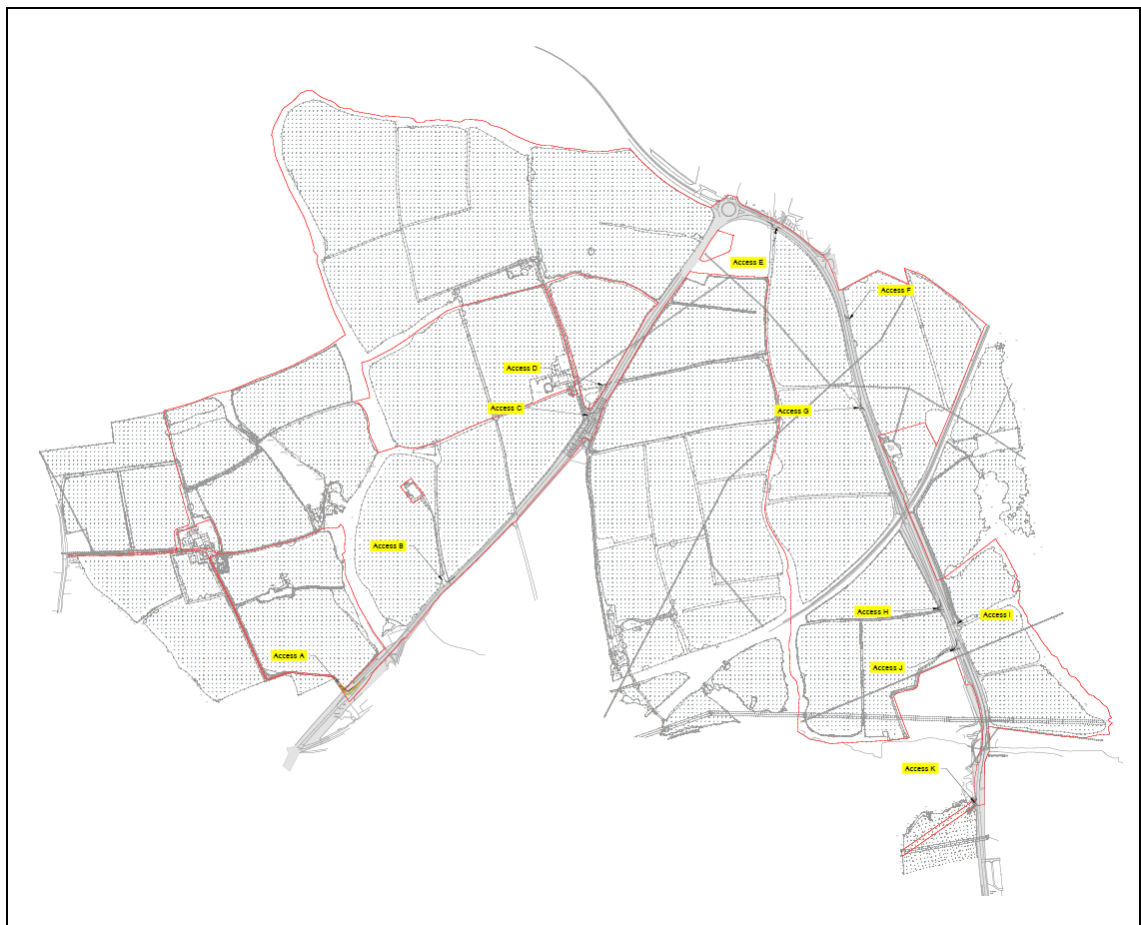
6.98. The anticipated HGV movements which could be associated with the construction period are set out in the following table.

Activity	Vehicle Type	Total Number of Deliveries	Two-way Movements
Solar modules & mounting structures	Up to 16.5 metre articulated HGV	975	1,950
Substation		10	20
Inverters/Transformers		86	172
Fencing		20	40
Cable delivery		10	20
Foundations/groundworks		25	50
Construction Compounds		20	40
Access tracks (stone)	10 metre tipper	1,917	3,828
General	Front-end JCB	1	2
Total		3,064	6,128

6.99. It is estimated that there will be around 14 to 21 deliveries per day by the largest vehicles (i.e. 28 to 42 two-way movements) over an approximate six to nine-month period. There will also be construction workers arriving at the site first thing in the morning and departing in the evening, although the numbers involved are forecast to be relatively low on a day-to-day basis. The level of traffic during the temporary construction phase is not considered to be material and will not have a detrimental impact on the safety or operation of the local or strategic highway network subject to implementation of appropriate HGV management, signage and site housekeeping (by way of wheel washing facilities within the site prior to vehicles exiting and, if required, the deployment of road sweepers along local roads in the vicinity of the site).

6.100. Access to the site during the construction phase is proposed via the existing access points, summarised and one new access point. The new access point provides access into the field to the immediate sough of the main development area, which provides the point of connection to the existing overhead wire associated with the routing of the export cable to the existing overhead wire located to the south of the main development site.

6.101. The access arrangements will be retained where the existing arrangements can accommodate the construction vehicles anticipated to require access to the site, and upgraded where necessary. These are shown on the plan below and repeated as Figure 3.1 of the accompanying Outline Construction Traffic Management Plan.



Operational Phase

- 6.102. Once operational, there is anticipated to be approximately two maintenance visits per month for routine maintenance requirements. These would typically be made by light vans or 4x4 type vehicles. Whilst the contractor's compounds will have been removed, space will remain within the site for vehicles to turn to ensure that no reversing onto the public highway will occur.
- 6.103. These types of vehicles are already using the A4076 Milford Road and the A477 and it is not considered that the frequency of maintenance trips will have a material impact on the existing operation and safety of the local highway network.
- 6.104. Overall, it is considered that the application proposal is acceptable from a transport perspective. In accordance with Future Wales Policy 18 criteria 9, there are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation.

Criteria 10 – the proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources

- 6.105. The outline Construction Environmental Management Plan details the appropriate pollution protection techniques that will be adopted by the appointed contractor team. The purpose of the document is to demonstrate the measures that could be used during the build-out phase to adequately protect the environmental resources, including potential impact upon

human receptors. The detailed CEMP will be submitted for approval, subject to whether the scheme is granted permission.

Criteria 11 – There are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration

- 6.106. Following a 40-year generation period, the development will enter into a decommissioning stage and this can be secured by a suitably worded planning condition.
- 6.107. The applicant / operator will either be insured or enter into a bond to guarantee that the scheme is decommissioned at the end of its operational lifespan. The applicant is therefore in position to provide the appropriate provisions for the decommissioning of the scheme.
- 6.108. Depending on the ecological value of the habitats that develop over the lifespan of the scheme, it is possible that certain areas of the site may need to be retained due to their value for wildlife on decommissioning. It cannot reasonably be foreseen what legislative protection will be afforded to particular wildlife species at the end of the scheme's lifespan. Further surveys for protected species which could be impacted by decommissioning would also be expected. No less than 12 months before the 40th anniversary of the first export date, a decommissioning and site restoration scheme would be submitted to the relevant planning authority for approval. The decommissioning strategy would detail how plant and equipment located within the application site would be removed.
- 6.109. Overall, the Great Harmeston Solar Farm duly accords with the 11 principles set out in Policy 18 of Future Wales and when weighed against the benefits, the proposal favour approval.

Sustainable Development

- 6.110. Welsh Government's main outcomes for the planning system reflect their vision of sustainable development which means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals. Overall, this means meeting the needs of the present without compromising the ability of future generations to meet their own needs. The provision of renewable energy plays an important part within Welsh Government priorities towards reducing carbon emissions, as part of decarbonisation, whilst enhancing the economic, social and environmental well-being of the people and communities of Wales.
- 6.111. Solar projects create opportunities for local businesses through the supply chain, including aggregates suppliers, security and monitoring during operation, farming and landscaping contractors and other aspects of the construction process, such as fencing. Construction workers may also use local services, which can bring further benefits to an area.
- 6.112. It is estimated that there will be around 52 on-site jobs generated during the construction period, which is estimated to be up to 9-months. These on-site employment opportunities will support further jobs in the supply chain, which is known as the multiplier effect. Research published by the Centre for Economics and Business Research (Cebr) suggests an employment multiplier for large-scale solar PV investments of 2.33 – i.e. for every job supported on-site, 1.33 indirect/induced jobs are supported in the wider economy. Applying this multiplier to the 52 on-site jobs, the Scheme could support 69 temporary

jobs in the wider economy during the 9-month build phase. In total, the Scheme could support 121 temporary jobs, both direct jobs on-site and indirect/induced roles in the wider economy, during the 9-month construction period. A similar number of jobs are expected to be supported as part of the decommissioning process after 40 years when the solar project comes to the end of its lifespan.

- 6.112.1. Another way of looking at the economic impact of the construction phase is to calculate the contribution a development makes to wealth creation, as measured by the increase in the value of goods and services generated within an area. This can be done by looking at the increase in gross value added (GVA), a common proxy for economic output. Using ONS data, it is possible to calculate GVA per employee by sector at a regional level.
- 6.112.2. The Cebr report referred to in paragraph 9.5.2⁹ gives a GVA multiplier of 2.39. This means for every £1 of GVA generated by on-site activities, a further £1.39 of GVA is generated in the wider economy. Factoring this into the analysis, the overall GVA impact associated with the construction phase is estimated at £6.8million (£2.8million associated with the on-site construction jobs and £4million from the multiplier effects) over the 9-month build timeframe.
- 6.113. Turning to the operational phase, research published by Cardiff University suggests that 0.4 Full Time Employment jobs will be produced per MW installed for solar/Photovoltaic (PV) schemes during the operational phase. Applying this to the Proposed Development and cumulative sites combined (156 MW), once operational the Scheme could support up to 62 full-time equivalent (FTE) jobs on-site and in the wider economy.
- 6.113.1. Overall, the Proposed Development is considered to provide significant beneficial effects in Pembrokeshire during the construction phase in relation to employment and economic contribution. Significant beneficial effects are expected to be provided during the decommissioning phase in relation to economic contribution. Negligible beneficial effects are predicted in respect of employment, economic contribution and business rates revenue once operational.
- 6.114. Social gain would be provided through the generation of local electricity that will be connected directly to the local grid; the proposal would reduce reliance upon overseas energy sources. The energy production would help to meet the national and local need for energy and therefore the development would fulfil an important social role. Furthermore, as part of the community benefits associated with the application proposal, the Applicant is proposing a legacy community benefit fund. Details of the fund will be discussed with the council and community councils prior to the start of construction.
- 6.115. Turning to environmental gains, these would be secured through carbon reduction and local biodiversity enhancements. The proposed solar farm presents a considerable opportunity to deliver landscape and biodiversity enhancement measures.
- 6.116. The proposed development would therefore deliver on the environmental arm of sustainable development.

⁹ Cebr, *Solar powered growth in the UK*. September 2014.

- 6.117. With regards to need, Planning Policy Wales identifies how, in all cases, considerable weight should be attached to the need to produce more energy from renewable and low carbon sources in order for Wales to meet its carbon and renewable targets. The Welsh Government target includes the need to generate 70% of its electricity consumption from renewable energy by 2030. It has a legally binding target to reduce greenhouse gas emissions by at least 80% by 2050 but it also announced in June 2019 to reach net-zero greenhouse gas emissions by 2050, in response to recommendations by the Committee on Climate Change. The Energy Generation in Wales 2018 report identifies how, of all electricity generated in Wales, 25% is from renewable sources, up from 22% in 2017. In terms of its own electrical consumption target of 70% by 2030, Wales reached the milestone of 50% electrical consumption being generated by renewable energy by 2018.
- 6.118. In terms of progress towards the 70% target, the Energy Generating in Wales 2018 report states how renewable energy installation rates have significantly cut as a result of reductions in government subsidies and *“There remain significant challenges to meeting the 70% target by 2030, notably the lack of available price support for renewable generation, as well as network constraints and network unavailability in some areas restricting the ability for new projects to connect”*.
- 6.119. The United Kingdom has withdrawn from the European Union Internal Energy Market (IEM). The IEM allows harmonised, tariff-free trading of gas and electricity across Europe (through interconnectors), leading to lower prices and greater security of supply. As wholesale gas and electricity prices in the UK are generally higher than elsewhere in Europe, interconnection has caused a reduction in wholesale prices, and hence consumer prices in the UK. Leaving the IEM has the potential to impact the trade of energy through interconnectors. The Government’s Briefing Paper on Energy, Climate Change and Brexit identifies how one potential impact of leaving the IEM is an increase in the cost of energy imports and this in turn would be passed on to UK’s householders and businesses. In terms of energy security, it notes how the interest of the United Kingdom should be to increase the flexibility and resilience of the grid, especially with increasing intermittent renewables. The development proposal would contribute towards the objectives set out in the briefing note.
- 6.120. Reflecting on the above, the social, economic, cultural and environmental issues are balanced and integrated for this proposal and as such in applying the legislative requirements of presumption in favour of sustainable development, it is clear that the need for the application proposal has been clearly justified and should be approved without delay. The scheme also accords with the Strategic Policy GN.4 ‘Resource Efficiency and Renewable and Low-carbon Energy’ of the adopted local plan.

Welsh Language

- 6.121. New development can influence population movement in an area. It may have positive effects through stabilising populations or promoting growth through in-migration. However, significant levels of migration, in or out, can have an adverse effect on the social balance of an area and, as a result, influence key characteristics of a community such as the use of Welsh language. With regards to development management considerations, TAN 20 sets out how the need for a Welsh language impact assessment would be limited to residential schemes (ten or more units) or commercial employment sites which generate new populations. Neither threshold applies to this development proposal, which relates to ground-mounted solar arrays.

- 6.122. Furthermore, as the development would not be permanently manned during its operational phase and as such it would not create any new permanent population to the local area, which would require consideration by way of a Welsh language impacts assessment.
- 6.123. There is no evidence to indicate that the scheme will prevent opportunities for local people to stay in their communities. As stated elsewhere in this statement, the application site is shared across four operational farms, all which benefit from farm diversification as a result of the scheme. There are not considered to be any negative impacts on the four operational farms, there are not considered to be any negative impacts on existing communities.
- 6.124. As a result, the scheme would not generate impacts resulting in the community migrating away with the development in place. Furthermore, it is not expected that the scheme will lead to a change in any demographics (age groups) of the community.
- 6.125. In line with the Planning (Wales) Act 2015, which requires, amongst other things, the consideration of the Welsh language at every level of the planning system, the applicant has adopted specific steps during the planning application process; these have included:
- Consultation materials in English and Welsh
 - Allowing community the opportunity to communicate directly in Welsh, by email or telephone, directly to a key member of the main project team without the need for any translation service.
- 6.126. These bilingual provisions will continue throughout the statutory pre-application consultation process.
- 6.127. The development proposal itself would contribute to the local community by way of a legacy community benefit fund. Details would be agreed at a later date and prior to construction.

7. Planning Balance

- 7.1. In terms of establishing a planning balance, this section of the statement examines the various material considerations to assist in determining the acceptability of the proposed development.
- 7.2. It is clear that delivering renewable energy is one of the Welsh Government's top national priorities for the next 20 years. The Future Wales set a clear direction of how Wales should be investing in infrastructure and development for the greater good of Wales and its people, the provision of renewable energy is firmly embedded in this future direction. Future Wales correctly picks up on the regulations set out in the Senedd on 9 February 2021 which formally commits Wales, for the first time, to legally binding targets to deliver the goal of net-zero emissions.
- 7.3. Paragraph 5.9.15 of PPW makes the important recognition that (inter alia) **"The local need for a particular scheme is not a material consideration, as energy generation is of national significance and there is a recognised need to optimise renewable and low carbon energy generation"**. Future Wales and PPW identify how significant weight should be given to renewable energy development.
- 7.4. Acknowledgement must be given to the pace of the legislative and policy evolution pertaining to the energy sector and the strong support to the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs. In particular, Policy 17 of Future Wales explains that in determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and Welsh Government's initial step towards net zero which is to generate 70% of consumed electricity by renewable means by 2030 and 100% by 2035.
- 7.5. Turning to the regional approach, Future Wales locates the application site within the northwest catchment area. The published document, on page 118, sets out how the provision of renewable energy is vital for the northwest to play its role in decarbonising. It states (inter alia) that it is vital the region plays its role in decarbonising society and supports the realisation of renewable energy.
- 7.6. Policies 17 and 18 set out Future Wales' approach to renewable energy generation across Wales. There is strong potential for wind, marine and solar energy generation and Strategic and Local Development Plans should provide a framework for generation and associated infrastructure. The Welsh Government wishes to see renewable energy play a role in supporting the regional economy in the south west. Local ownership and distribution is important for ensuring communities in proximity to renewable energy development benefit from it and that our future energy system better serves Wales.
- 7.7. It is worth highlighting that the applicant does not consider that the proposal would result in significant effects simply by virtue of the development being visible from any particular location.
- 7.8. At paragraph 1.2, the PPW identifies how its primary objective is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales as required by the Well-

being of Future Generation (Wales) Act 2015. There is no dispute that the development would increase the installed renewable energy capacity, contributing to meeting local and national renewable energy targets, reducing reliance on energy generated from fossil fuels and actively facilitating the transition to a low carbon economy. To this end, it would embrace the WCFG Act goals to achieve a globally responsible, prosperous and resilient Wales (this is discussed below). Overall, the applicants say that the application proposals are in accordance with Welsh Government policies in meeting the challenges of the climate emergency as set out in the Future Wales and PPW. Accordingly, in this case the Future Wales & PPW favours approval.

- 7.9. PPW and Future Wales make it clear that achieving decarbonisation and climate-resilience is a key national priority for Wales, and a recognition of a need for Wales to focus on generating the energy it needs to support its communities and industries over the next twenty years. The application proposal would align with and support this approach. However, there is more at play here, there are additional matters which weigh in favour of the proposed development. These are discussed in turn below.

Renewable and low carbon projections

- 7.10. PPW sets out a need for a precautionary action on the delivery of renewables to prevent Wales being 'locked in' to further fossil fuels extraction and high carbon development. In the context of energy, the precautionary approach manifest itself as a 'factor of safety' (or additional renewable energy capacity) that should be added to the overall provision of renewable energy. As discussed elsewhere in this Statement, the Energy Generation in Wales Report 2023 (2025), identified how approximately 34% of all Welsh electricity generation came from renewables in 2023. This is up from 27% in 2022 due to significant increase in generation from renewable sources. It is clear that Wales is heading in the right direction and this application will help with the target of reaching 1.5 GW of locally owned renewable energy capacity by 2035. This demonstrates and constitutes the overriding need for the application proposal.

Well-being and Future Generations (Wales) Act 2015

- 7.11. Planning Policy Wales identifies how the planning system in Wales should seek to maximise the contribution planning makes to achieve the goals set out in the Well-Being of Future Generations (Wales) Act. The Well-being of Future Generations (Wales) Act is about improving the social, economic, environmental and cultural well-being of Wales. The Well-being Act has established seven well-being goals which are intended to shape the work of all public bodies in Wales. In order to demonstrate that appropriate consideration has been given to the well-being goals and sustainable development principle in the decision-making process, public bodies are required to have regard to the 'five ways of working' contained in the Well-being Act. These require consideration of: involvement; collaboration; integration; prevention; and long term factors.
- 7.12. The Wellbeing of Future Generations (Wales) Act requires planning decisions to comply with the 7 well-being goals of the Act. The seven well-being goals are discussed below together with an assessment of how the application proposal contributes towards them.

Well-Being Goals	Applicant's Assessment
<p>A prosperous Wales - An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work</p>	<p>Welsh Government's main outcomes for the planning system reflect their vision of sustainable development which means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals. Overall, this means meeting the needs of the present without compromising the ability of future generations to meet their own needs. The provision of renewable energy plays an important part within Welsh Government priorities towards reducing carbon emissions, as part of decarbonisation, whilst enhancing the economic, social and environmental well-being of the people and communities of Wales.</p> <p>Economic benefits will arise through the provision of temporary jobs during the construction phase at the application site. Based on information provided by the Applicant, the average number of construction workers on-site is expected to be around 52. The construction period is estimated to be 9-months.</p> <p>Based on data from the Photovoltaic Memorandum of Agreement published in February 2023, solar farms greater than 10MW are charged a rate of £2,040 per MW. Applying a multiplier of 0.515¹⁰ gives a ratable value per MW of £1,050.6.</p> <p>Based on the above, it is estimated that the Proposed Development could generate around £68,289 per annum in business rates. Over the intended 40-year lifespan of the scheme, business rates generated could total around £1.5million (present value).</p> <p>The scheme would contribute towards farm diversification, which is discussed further below.</p>
<p>A resilient Wales - A nation which maintains and enhances a biodiverse natural environment with healthy</p>	<p>This Statement has highlighted the national legislation, guidance and policy which supports the transition to a low carbon future and the</p>

¹⁰ Based on information presented at: <https://businesswales.gov.wales/topics-and-guidance/business-tax-rates-and-premises/business-rates-wales>.

<p>functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change)</p>	<p>continued roll out of renewable energy infrastructure. PPW states how the benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance and that the planning system should, inter alia, maximise renewable and low carbon energy generation. The application proposal will have a positive impact on climate change over its 40-year lifespan. The application proposal would contribute to limiting the impacts of climate change and thus increasing the social, economic and ecological resilience to the challenge. The application would deliver significant increases in habitats and hedgerows across the development site.</p>
<p>A healthier Wales – A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.</p>	<p>Again, as discussed elsewhere in this statement, national guidance, policy and objectives are clear in their support towards the transition and delivery of a low carbon future. The continued roll out of renewable energy infrastructure is a critical element to achieve net zero by 2050. Adapting to climate change can drive a more sustainable, greener, cleaner society by bringing people together to create better places, through urban and rural green infrastructure; improved air quality; locally managed nature-based solutions; less wastage of resources; and citizen science and engagement in building community resilience. The Welsh Government has recognised the need to take action to prepare for climate change in publishing Prosperity for all: A Climate-conscious Wales in 2019, its five-year plan to adapt to climate change impacts.</p>
<p>A more equal Wales – A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).</p>	<p>The wider benefits of renewable energy include security of energy supply and reduced energy costs for the consumer. Indeed, the proposed scheme would be delivered without any government subsidy support and as such, there is no burden placed on the taxpayer to fund the development. In this respect, the benefits of the project are to be realised through reduced energy bills and security of supply, which will reduce Wales’ exposure to the volatility of the wholesale energy markets. These are important factors in addressing fuel poverty, which disproportionately effects low-income</p>

	<p>households across Wales and contributes to economic inequality.</p> <p>To summarise, social gain would be provided through the generation of local electricity that will be connected directly to the local grid. The proposal would reduce reliance upon overseas energy sources. The energy production would help to meet the national and local need for energy and therefore the development would fulfil an important social role.</p>
<p>A Wales of cohesive communities – Attractive, viable, safe and well-connected communities.</p>	<p>The application proposal delivers decentralised energy generation and would therefore contribute towards energy provision & security at a local level.</p> <p>The application proposal is therefore considered to contribute to the aim of achieving an attractive, viable, safe, cohesive communities in these terms.</p>
<p>A Wales of vibrant culture and thriving Welsh language – A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.</p>	<p>The well-being of the language depends upon a wide range of factors, including education, demographic change, community activities and a sound economic base to maintain thriving, sustainable communities and places. The development would not result in any demographic changes that would put pressure on education or community activities. The development would not impact the current working practices of agricultural units surrounding the development site. The proposed green infrastructure would encourage recreational activity. The proposal would not conflict with goals for the Welsh Language.</p>
<p>A globally responsible Wales – A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being</p>	<p>The scheme would principally and directly address the causes of climate change and the declared climate emergency. The development of the scheme would therefore contribute to meeting Wales’ net zero target by 2050 and contribute towards meeting the Welsh Government target of meeting 70% of Wales electricity demands from renewables by 2030.</p> <p>The proposal is therefore in line with the objectives of a globally responsible nation as set</p>

	out in the Well-being of Future Generations Act 2015.
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7.13. Overall, there can be no dispute that the proposed development will increase the installed renewable energy capacity, contributing to meeting local and national renewable energy goals, reducing reliance on energy generated from fossil fuels and actively facilitating the transition to a low carbon economy; this carries significant weight in the determination process. To this end, it would clearly embrace the WCFG Act goals to achieve a globally responsible, prosperous, and resilient Wales and be in accordance with Welsh Government policies in meeting the challenges of the climate emergency as set out in Future Wales and PPW.

7.14. Overall, it is considered that there is no conflict with Policy 18 of Future Wales. If the Inspector reaches a different view, reference is made to the approved DNS solar scheme at Wauntysswg (DNS Ref 3213639), whereby the Minister of Housing and Local Government reached the conclusion that *"I consider the significant benefits of the proposal, which is anticipated to generate 30MW of electricity per annum from a renewable source, outweighs any harmful landscape or visual impacts ..."* In reaching her conclusions, the Minister was satisfied that the landscape and visual impacts of the development **were temporary and fully reversible**.

Farm Diversification

7.15. Planning Policy Wales, Future Wales and TAN 6 all recognise how renewable energy is a form of farm diversification. Furthermore, planning policy does not impose any physical restrictions over the size of renewable energy schemes that constitutes farm diversification.

7.16. All farming enterprises associated within the site will receive a rental income for the duration of the solar tenancy (a period of 40 years). Income and expenditure associated with agriculture can be volatile so a long-term solar agreement would provide the business with a source of regular, predictable income which would enhance the continued resilience and viability of these family-run holding, helping to secure the long-term viability of the business for the next generation. The proposal would therefore *"facilitate diversification of the rural economy"* (TAN6) whilst being *"subordinate to, compatible with and supports the continued operation of the agricultural activity of the existing working farm"* and *"is of a scale and nature appropriate to the existing farm operation"*.

7.17. No agricultural land will be severed as a result of the proposed solar scheme. The proposals will not impact upon drainage outside the proposed areas. Adjacent agricultural land will be unaffected.

Compliance with the Local Development Plan

7.18. As stated elsewhere in this Statement, in broad terms, the policies in the Pembrokeshire County Council Local Development Plan support the principle of renewable development and align with the principles of sustainable development and renewable energy objectives. However, they carry less weight than the updated policy stance in Future Wales, PPW and the WCFG Act.

- 7.19. Policy GN.3 as well as draft policy GN 3 deals with adequate infrastructure capacity. Where proposals generate a directly related need for new or improved infrastructure, it must be funded by the proposal. As stated elsewhere in this chapter, the application proposal will make efficient and effective use of spare capacity within the electricity grid network and the point of connection is near the main development. No other infrastructure works are considered necessary to make the development acceptable in planning terms. For the reason above the development accords with the requirements of the adopted and draft local planning policy.
- 7.20. Through Policy SP 1, the council will support development where it is demonstrated that they are consistent with the principles of sustainable development. Whilst sustainable development is discussed in section 5, it is also noted that with specific regards to the pertinent principles of Policy GN.2 which relates to sustainable design. This policy notes that climate change should be integrated with the design of the proposal to be able to meet future challenges. (included sustainable measures when known for drainage/ecology).
- 7.21. Policy GN.2 and emerging Policy GN 2 relates to the development criteria which the development will need to meet to achieve a sustainable and appropriately location. The proposal demonstrates compliance the national planning policy and relevant planning policies in this plan. In addition, the ES assesses the effects of the development on local amenities and provides adequate mitigation measures to alleviate these effects. Therefore, the development is in accordance with the overall thrust of Policy GN.2 and emerging Policy GN 2.
- 7.22. Policy GN.2 and emerging policy GN 2 also relates to water conservation. The development has incorporated water conservation measures, including SUDS. The NRW Flood Map for Planning for Surface Water and Small Watercourses shows that the majority of the Site is in Flood Zone 1. There are however, some Flood Zone 2 and 3 flow paths located within the Site, mainly associated with existing watercourses on and near to the Site. Currently, the layout shows one inverter/transformer within a Flood Zone 2 extent for Surface Water and Small Watercourses. The layout is intended to be further refined post consultation to ensure all greater infrastructure is not at risk of flooding from surface water and small watercourses.
- 7.23. As standard, the lowest edge of solar panels proposed on Site will be raised 0.8m above the ground, which will ensure existing surface water flow patterns will be maintained.
- 7.24. To ensure maintenance access to Ordinary Watercourses on Site is not impacted by the Proposed Development, an easement of at least 5m from the top of the bank from all Ordinary Watercourses has been left clear of development. This easement has been agreed with the SAB during consultation.
- 7.25. The Site is not considered to be at significant risk of flooding from any source. A surface water drainage strategy has been proposed to manage surface water runoff from the development to ensure runoff rates and associated flood risk on Site and elsewhere do not increase. The surface water drainage strategy for the proposed solar panel areas comprise perimeter swales on the downslopes of solar arrays where ground levels are shown to be falling offsite. Swales on Site will help capture overland flows on Site to reduce the risk of impacting neighbouring land and will also help promote infiltration of surface water. Any surface water runoff to exceed the capacity of the proposed swales would simply slowly

overtop the downslope swale berm and disperse into the surrounding grassland, as per the existing condition.

- 7.26. Surface water runoff from the proposed substation will be collected with a series of perforated collector pipes and solid walled surface water drains and directed towards an attenuation basin. The substation SuDS have been designed to manage surface water runoff from 0.196ha of impermeable hardstanding for all storm events up to and including a 1 in 100 year rainfall event plus 40% allowance for climate change. This impermeable area used is a conservative value as in reality, much of the substation will comprise of permeable construction. The proposed attenuation basin will outfall into the Ordinary Watercourse at the eastern edge of the substation area at a controlled rate of 1l/s (the calculated 50% Annual Exceedance Probability (AEP) (QBAR) greenfield runoff rate).
- 7.27. Design and landscape are considered through Policy GN.1. A planting scheme and a Landscaping Scheme will be provided alongside the application, and the surface of the development will be kept predominantly as permeable.
- 7.28. Overall, it is considered that the application proposal would accord with the development plan as a whole as well as emerging policies.

8. Conclusion

- 8.1. The purpose of this Planning Statement is to provide a balanced justification for the proposed development. For the reasons outlined in this Planning Statement, it is considered that the application submission has demonstrated that the proposal would not have an unacceptable adverse impact on the environment and as such accords with Future Wales Policies 17 and 18. Having regard to the publication date of Future Wales relative to the Pembrokeshire County Council Local Development Plan as well as Pembrokeshire's Emerging Local Development Plan, it is asserted that the proposal would accord with the development plan as a whole.
- 8.2. The supporting technical documents confirm that the selected site is appropriate in that it can accommodate the proposed development. The application proposal is considered to be acceptable within the open countryside as it represents agricultural diversification. The benefits of the development are multiple: (i) it would provide a valuable contribution with regards to provision of decentralised renewable energy; (ii) it would contribute towards the viability of the four farming enterprises through diversification of income; (iii) with regards to ecology, it has followed the stepwise approach and it would deliver significant biodiversity improvements and these can be secured by planning condition; (iv) economic benefits would be secured in terms of construction and less so operational management of the application proposal. The application proposal will provide employment and business opportunities for component suppliers / installers and those involved in grid connection, transport and logistics. Where possible, local businesses will be contracted for relevant parts of the scope of works over the period of construction, operation and maintenance. There will be additional induced impacts during the construction period with any incoming construction workers (engineers, project managers etc) spending their wages at a local level (restaurants, retail stores etc) and using local accommodation.
- 8.3. It is clear that delivering renewable energy is one of the Welsh Government's top national priorities for the next 20 years. The Future Wales set a clear direction of how Wales should be investing in infrastructure and development for the greater good of Wales and its people, the provision of renewable energy is firmly embedded to this future direction. Future Wales correctly picks up on the regulations set out in the Senedd on 9 February 2021 which formally commits Wales, for the first time, to legally binding targets to deliver the goal of net-zero emissions. Paragraph 5.9.15 of PPW makes the important recognition that (inter alia) ***"The local need for a particular scheme is not a material consideration, as energy generation is of national significance and there is a recognised need to optimise renewable and low carbon energy generation"***. Future Wales and PPW identifies how significant weight should be given to renewable energy development.
- 8.4. Turning to the regional approach, Future Wales locates the application site within the south west regional catchment area. The published document, at page 153, sets out how the provision of renewable energy is vital for the south west to play its role in decarbonising. It states (inter alia) (own emphasis underlined and in bold) ***"It is vital the region plays its role in decarbonising society and supports the realisation of renewable energy. Policies 17 and 18 set out Future Wales' approach to renewable energy generation across Wales. There is strong potential for wind, marine and solar energy generation and Strategic and Local Development Plans should provide a framework for generation and associated infrastructure. The Welsh Government wishes to see energy generation, storage and management play a role in supporting the south west economy"***.



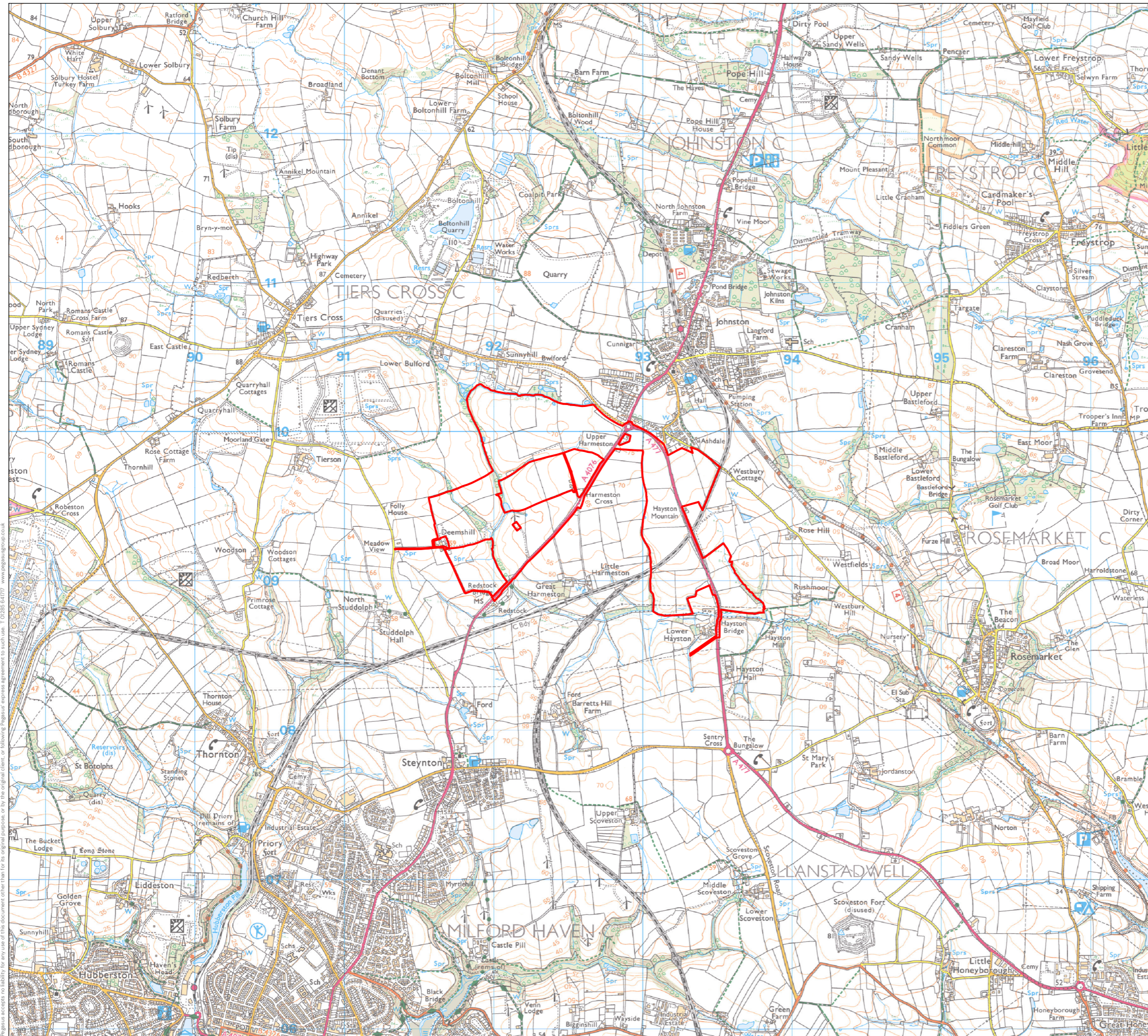
- 8.5. There is more at play here, the Energy Generation in Wales Report 2023 identified how approximately 34% of all Welsh electricity generation came from renewables in 2023. This is up from 22% in 2022 due to a significant increase in generation from non-renewable sources. It is clear that Wales is heading in a positive direction in terms of its energy mix and its reliance on non-renewable sources. Accordingly, further change is required to achieve the projected 100% of renewables by 2035. This application proposal will make a positive proportionate contribution towards this target.



Appendix



Appendix 1: Site Location Plan



KEY

Site Boundary

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REV	DATE	DESCRIPTION

SITE LOCATION PLAN

GREAT HARMESTON

ARISE RENEWABLE ENERGY UK LTD

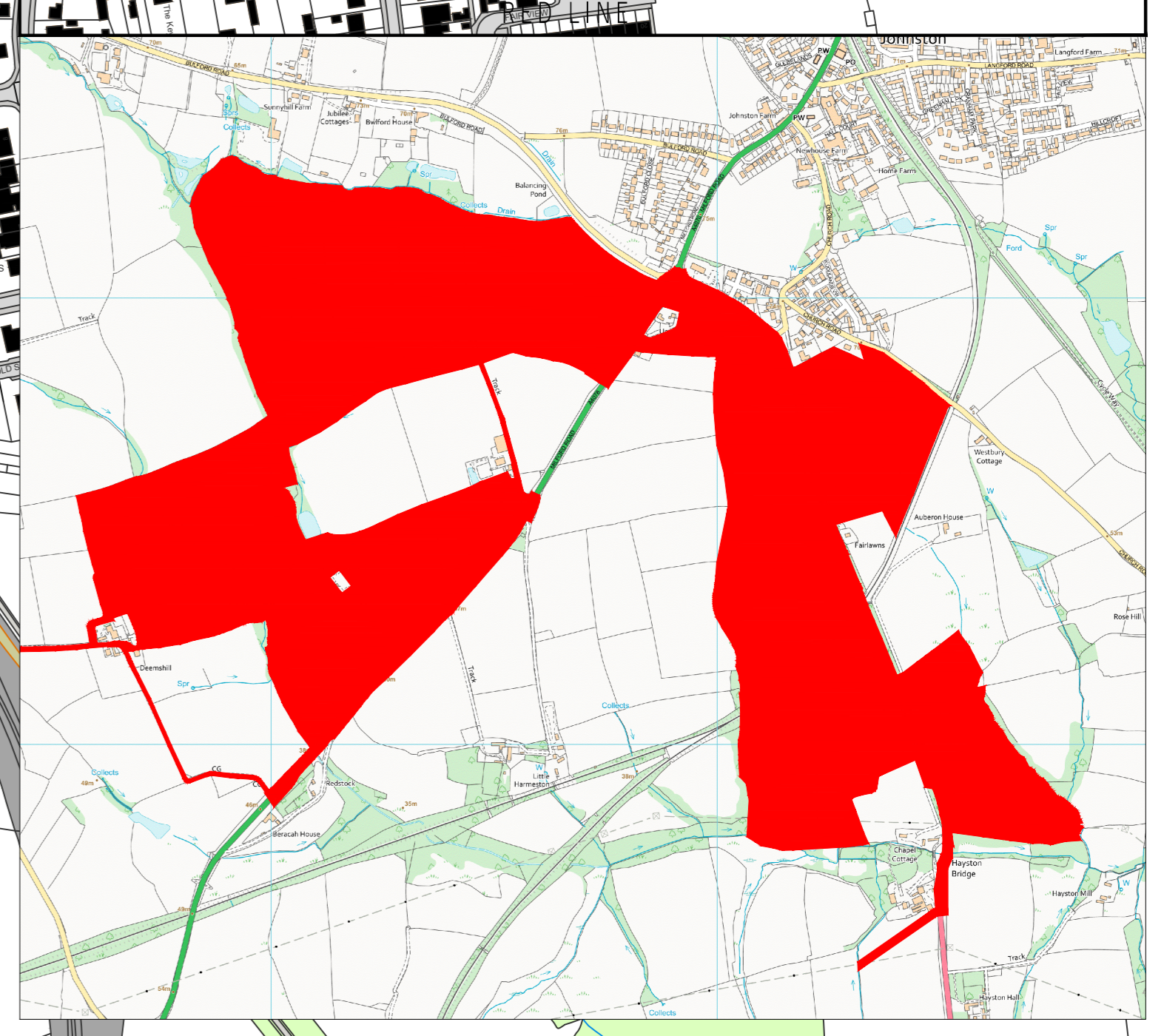
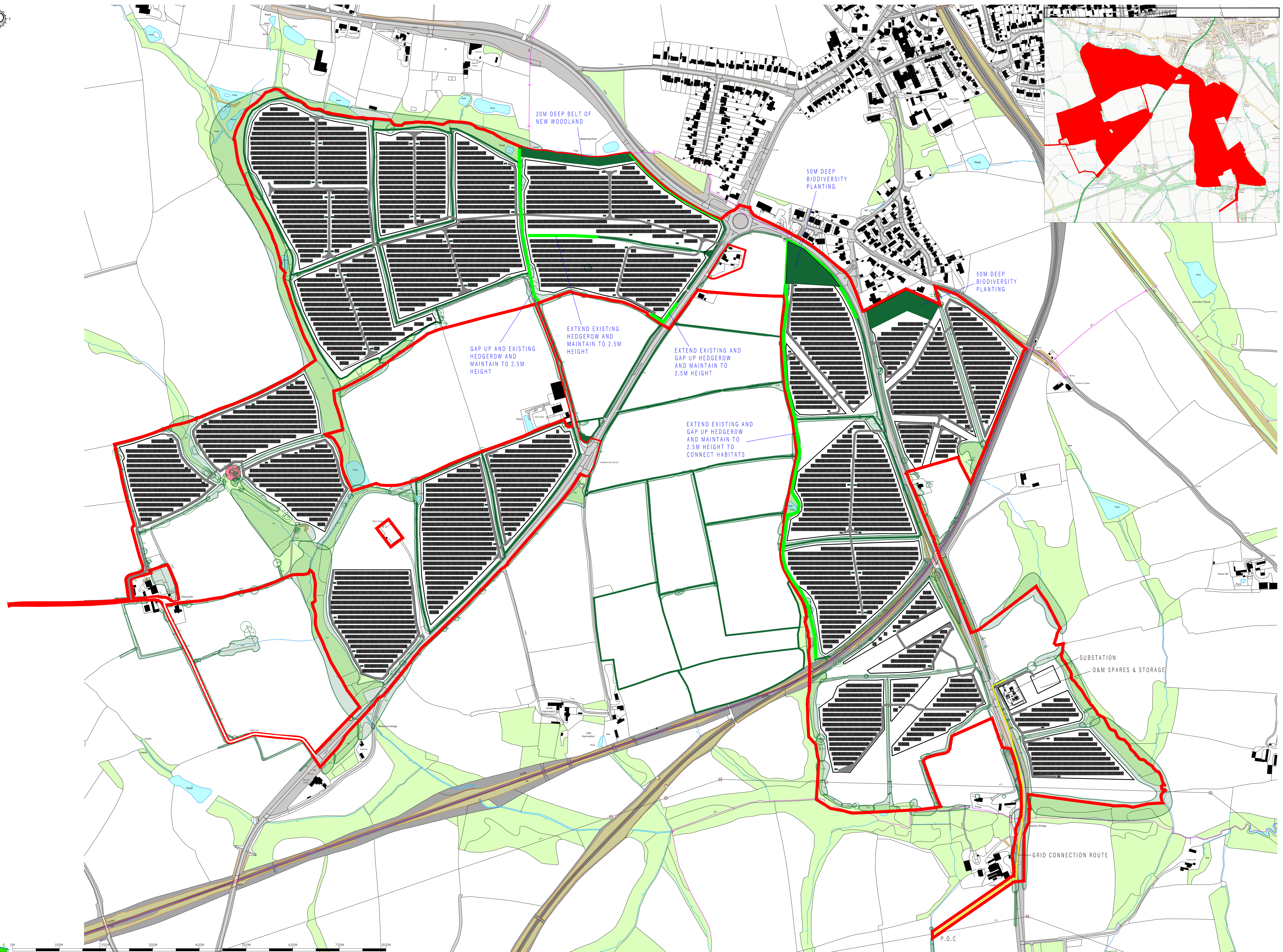
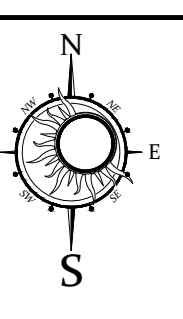
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-	D	▲	0.5KM

DRAWING NUMBER
P24-1037_EN_03





Appendix 2 Proposed Layout Plan

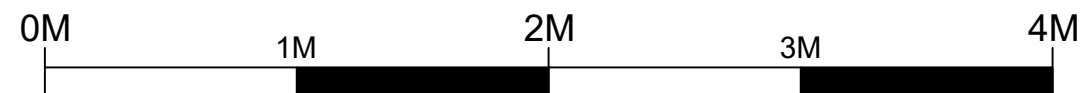
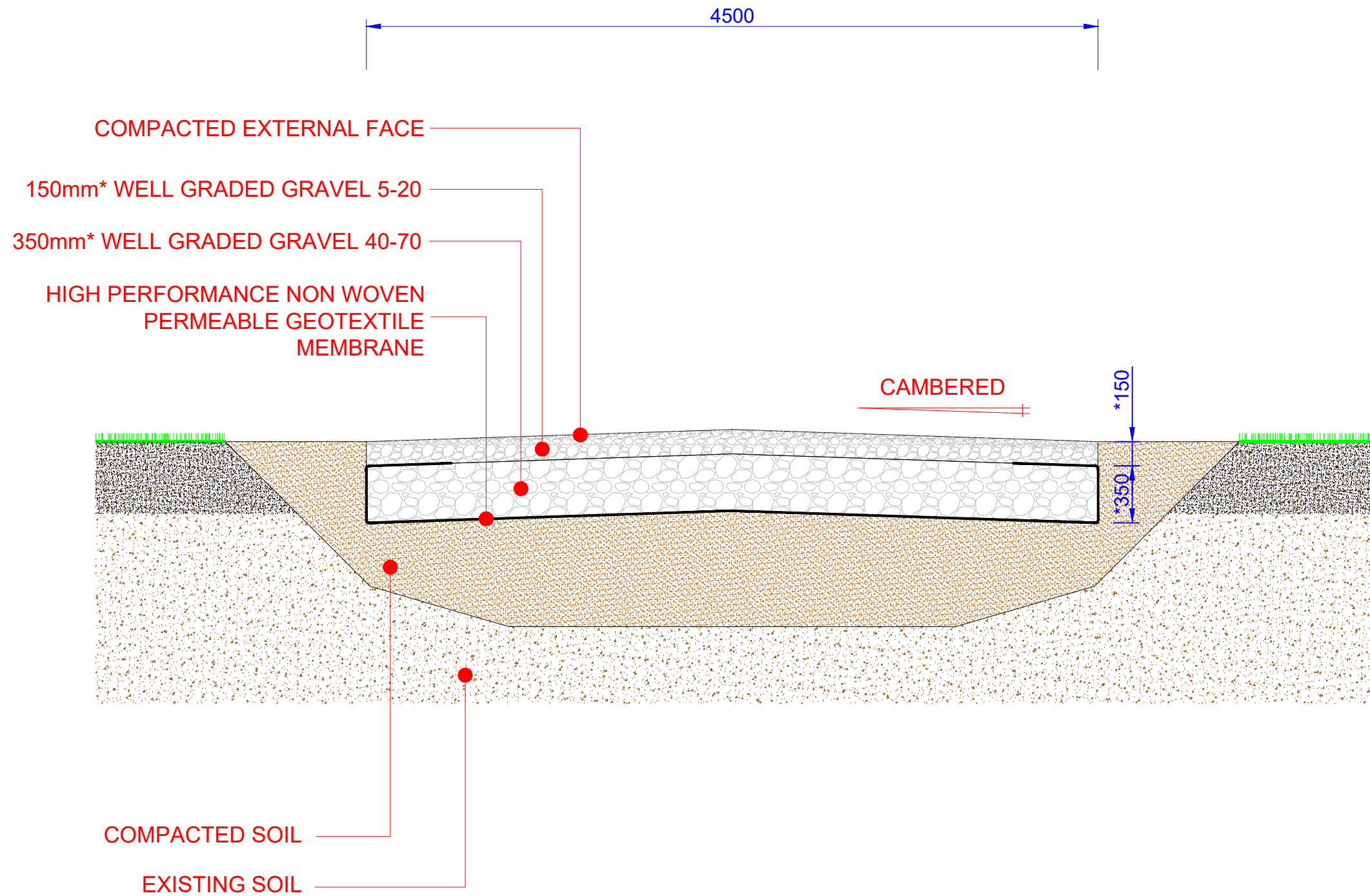


arise
93.11 MWp
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GREAT HARMESTON
PROPOSED SITE PLAN
LAND EAST & WEST OF JUNCTION OF MILFORD ROAD A4076 A477, JOHNSTON SA62 3HL
PRE-PLANNING
1:2500@A1 JUL 25
95749-CJ-05-CHK-0002-SI-P01



Appendix 3 Ancillary drawing pack

* TYPICAL GENERIC SECTION , ALL DIMENSIONS AND BUILD UP SHOWN ARE NOMINAL, SITE ENGINEER TO SPECIFY EXACT BUILD UP AND SECTIONS FOLLOWING SITE INVESTIGATION



* TYPICAL GENERIC SECTION , ALL DIMENSIONS AND BUILD UP SHOWN ARE NOMINAL, SITE ENGINEER TO SPECIFY EXACT BUILD UP AND SECTIONS FOLLOWING SITE INVESTIGATION



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TITLE : ACCESS ROADS

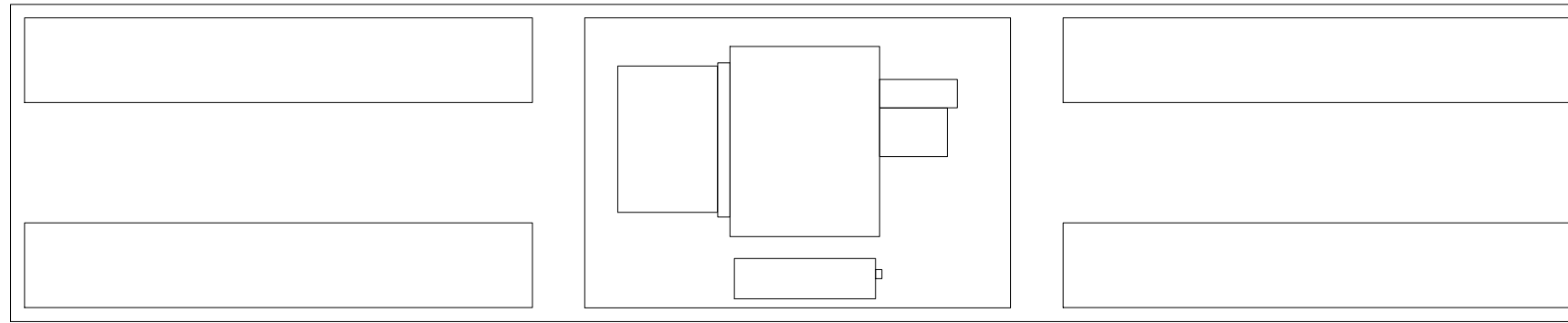
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LAND EAST & WEST OF
JUNCTION OF
MILFORD ROAD
A4076 A477,
JOHNSTON SA62 3HL

STATUS : PLANNING

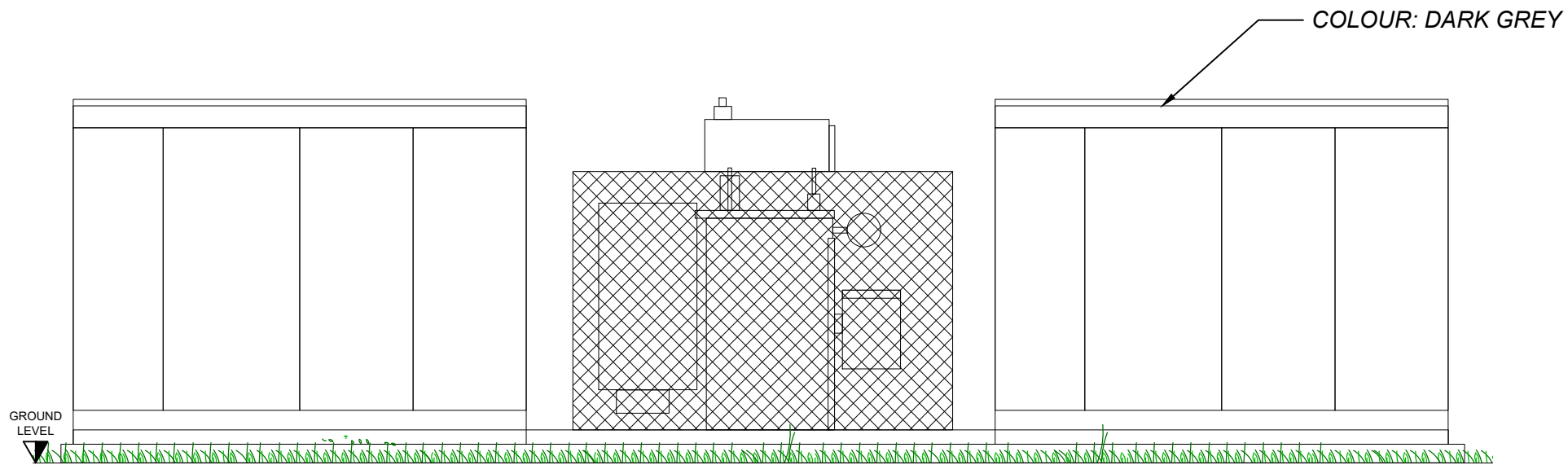
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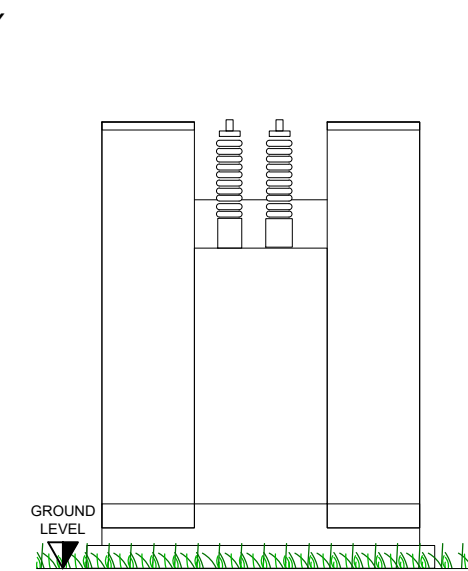
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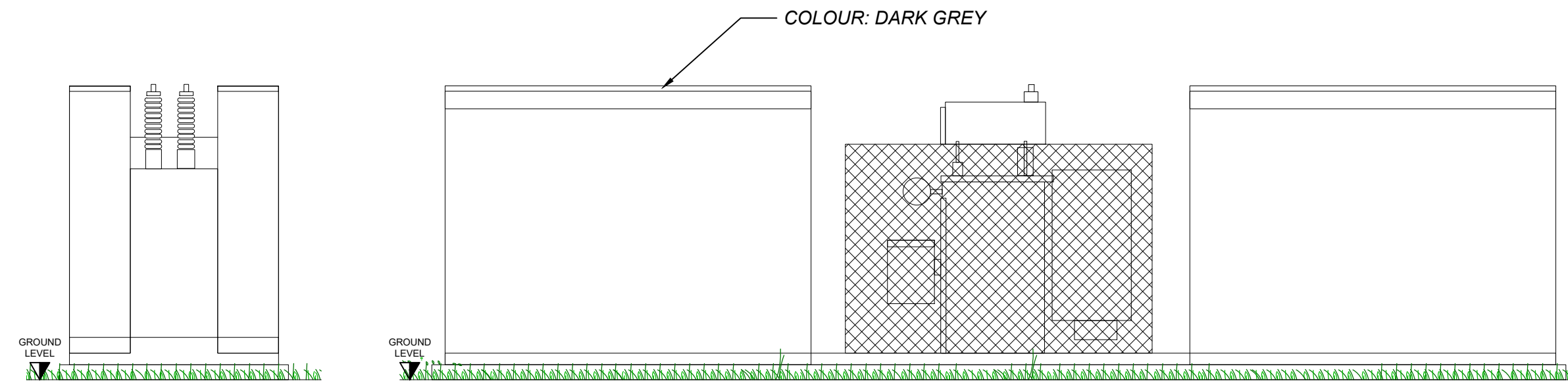
PLAN



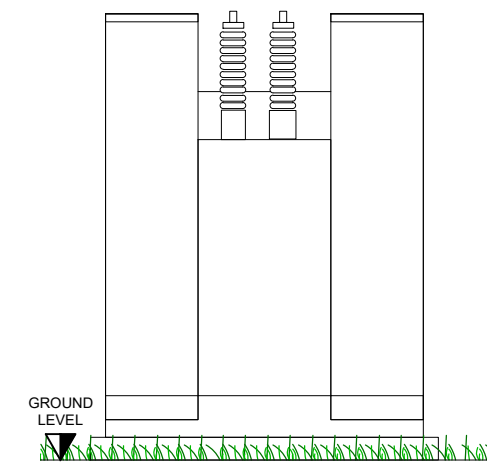
FRONT ELEVATION



SIDE ELEVATION



REAR ELEVATION



SIDE ELEVATION



SITE : GREAT HARMESTON

TITLE :
OUTDOOR AUX EQUIPMENT

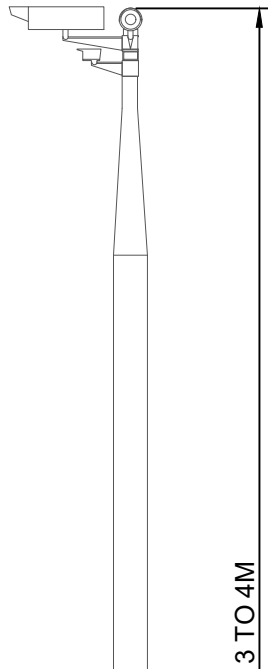
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LAND EAST & WEST OF
JUNCTION OF
MILFORD ROAD
A4076 A477,
JOHNSTON SA62 3HL

STATUS :
CONSULTATION

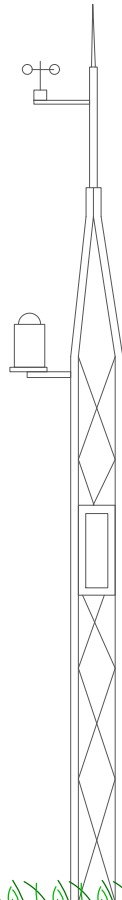
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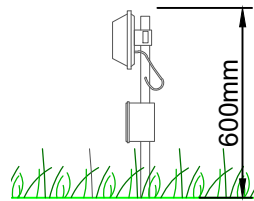
DO NOT SCALE FROM DRAWING, USE ANNOTATED DIMENSIONS ONLY



POLE MOUNTED - THERMAL IMAGING, INWARD-FACING CCTV
COLOUR : PLAIN GALV STEEL



MET DATA COLLECTION
COLOUR : DARK GREEN

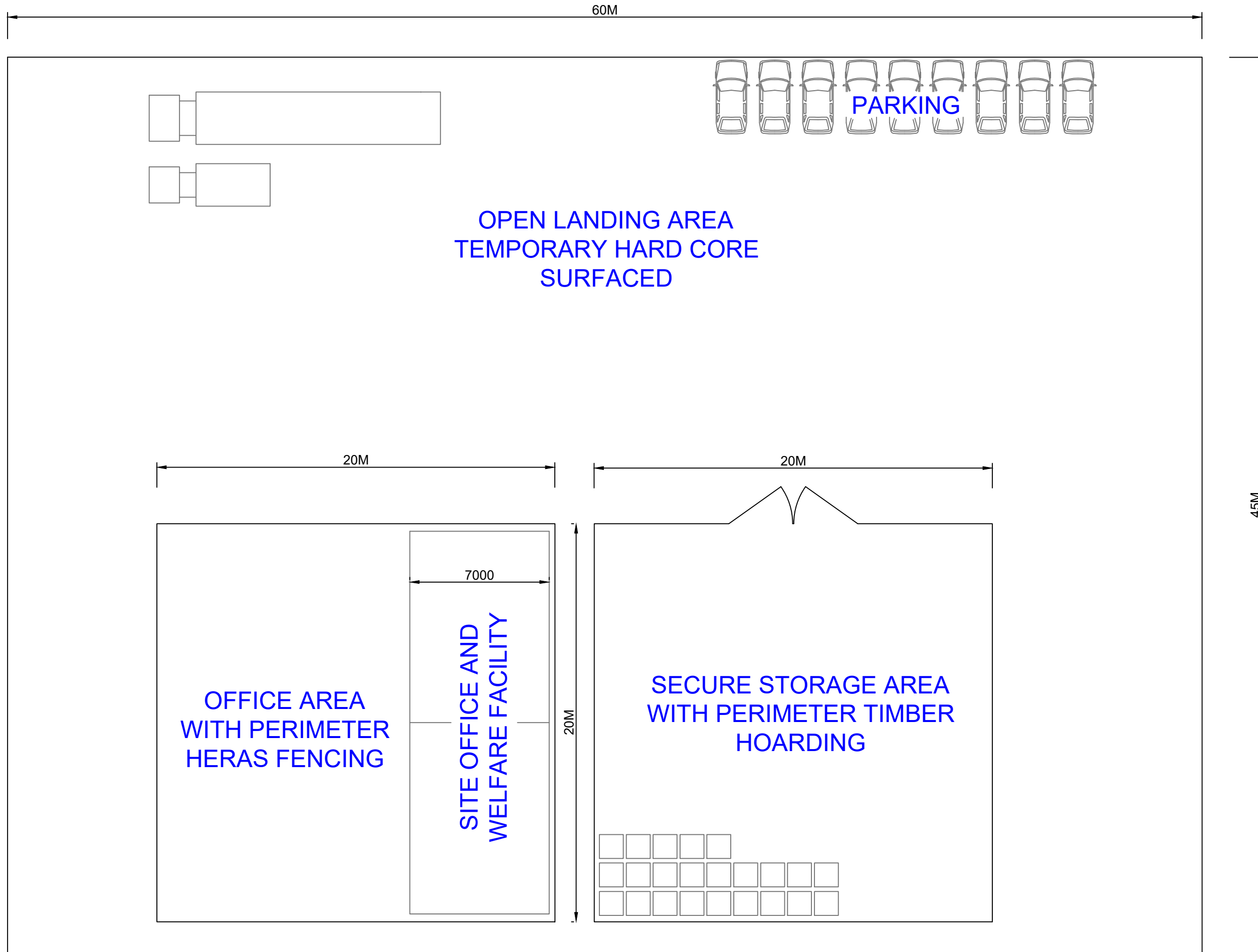


GROUND MOUNTED RADAR
COLOUR : DARK GREEN



	
SITE : GREAT HARMESTON	
TITLE : SECURITY & MET DATA	
LOCATION : LAND EAST & WEST OF JUNCTION OF MILFORD ROAD A4076 A477, JOHNSTON SA62 3HL	
STATUS : PLANNING	
SCALE : 1:25@A3	DATE : JUN 24
DRAWING NUMBER : FSF-RHL-V1-00-CM-Y-0009-S0-P01	

DO NOT SCALE FROM DRAWING, USE ANNOTATED DIMENSIONS ONLY



SITE : GREAT HARMESTON

TITLE : TYPICAL TEMPORARY
CONSTRUCTION
COMPOUND

LOCATION :
LAND EAST & WEST OF
JUNCTION OF
MILFORD ROAD
A4076 A477,
JOHNSTON SA62 3HL

STATUS :
PLANNING

SCALE : 1:50@A3 DATE : JUN 24

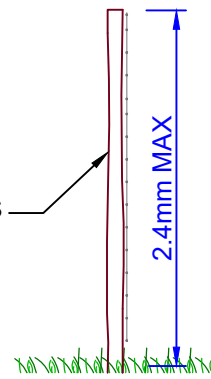
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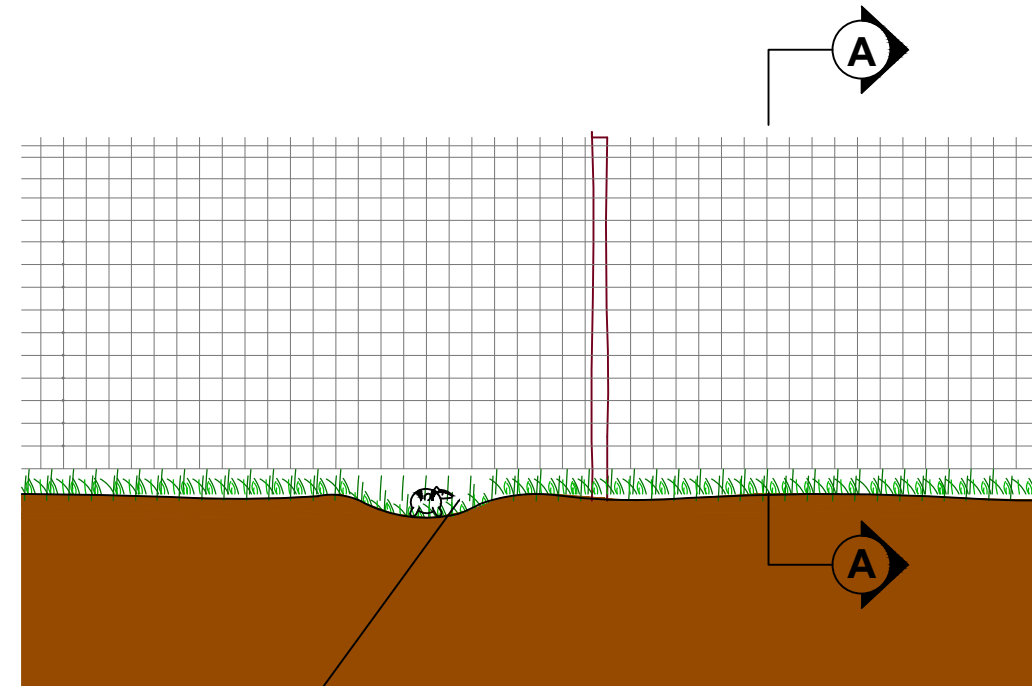


TYPICAL GATE IMAGE

DEER FENCING ON WOODEN POSTS

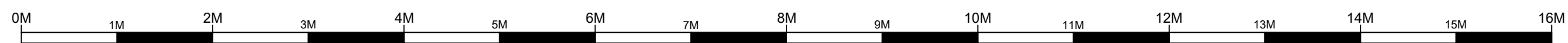


SECTION A'A



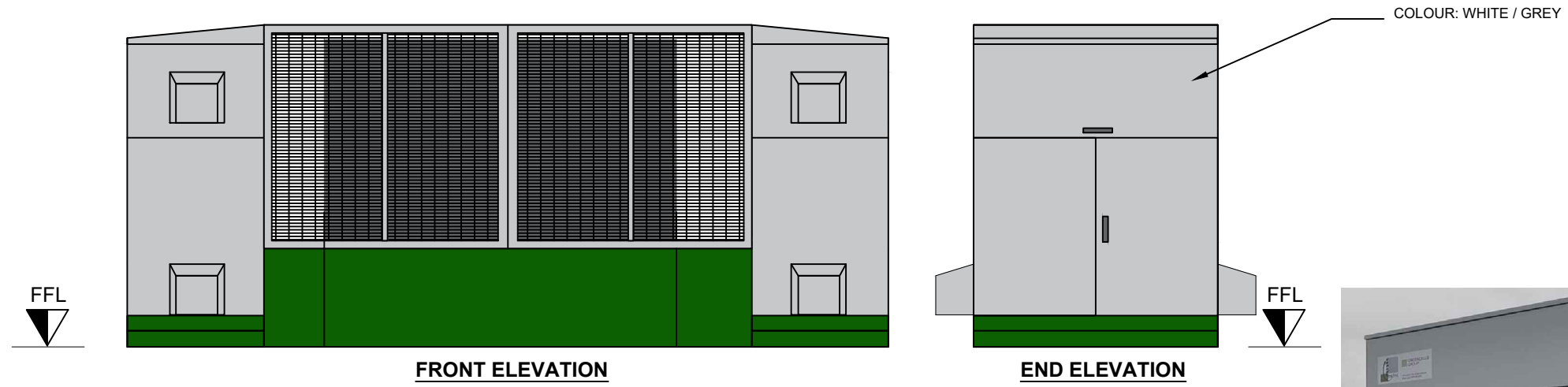
ELEVATION

PERMEABILITY FOR SMALL MAMMALS ENABLED BY NATURAL UNDULATIONS IN GROUND LEVEL

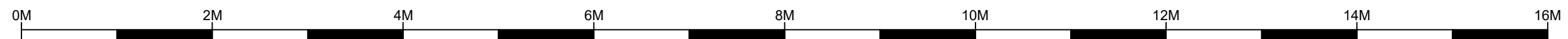
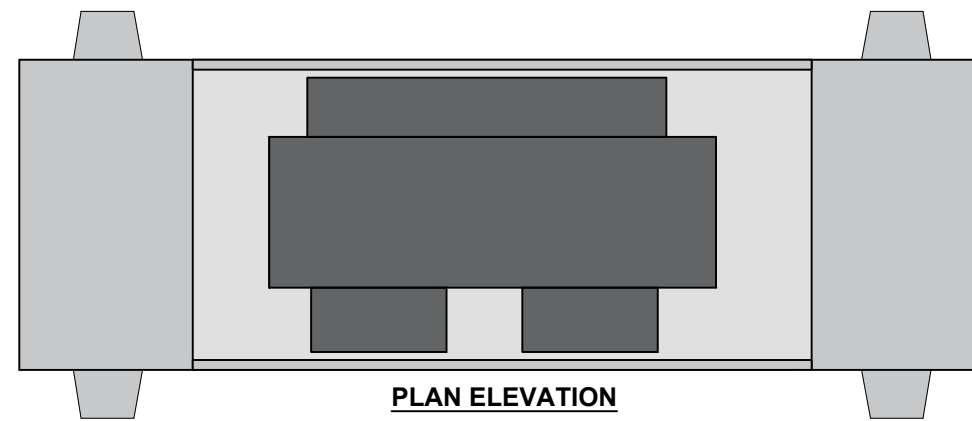
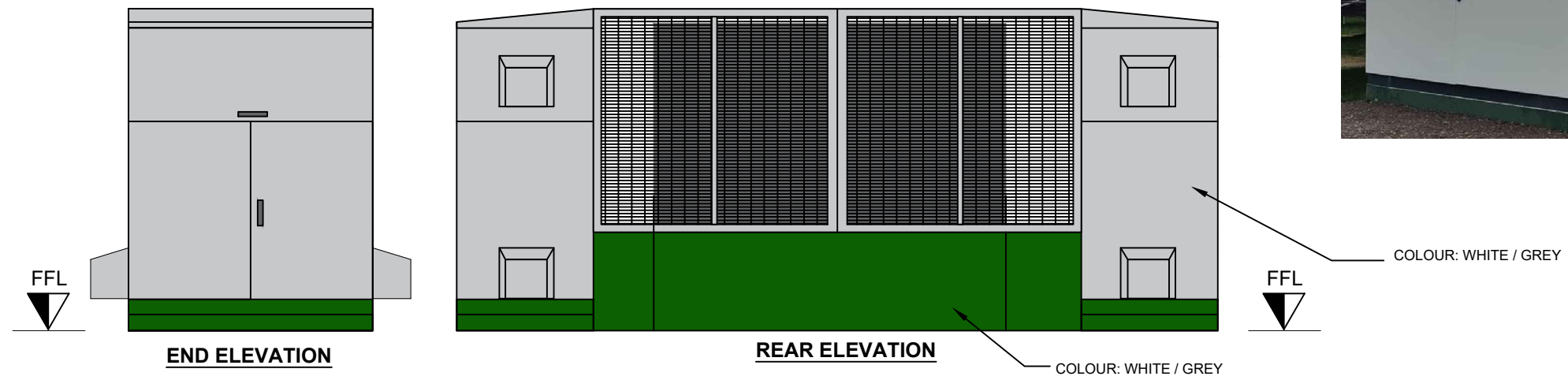


SITE : GREAT HARMESTON	
TITLE : PERIMETER FENCING	
LOCATION : LAND EAST & WEST OF JUNCTION OF MILFORD ROAD A4076 A477, JOHNSTON SA62 3HL	
STATUS : PLANNING	
SCALE : 1:50@A3	DATE : JUN 24
DRAWING NUMBER : FSF-RHL-V1-00-CM-Y-0011-S0-P02	

DO NOT SCALE FROM DRAWING, USE ANNOTATED DIMENSIONS ONLY



IMAGE



SITE : GREAT HARMESTON

TITLE : PV INVERTERS

LOCATION :
LAND EAST & WEST OF
JUNCTION OF
MILFORD ROAD
A4076 A477,
JOHNSTON SA62 3HL

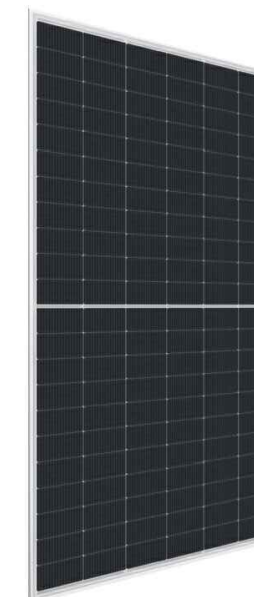
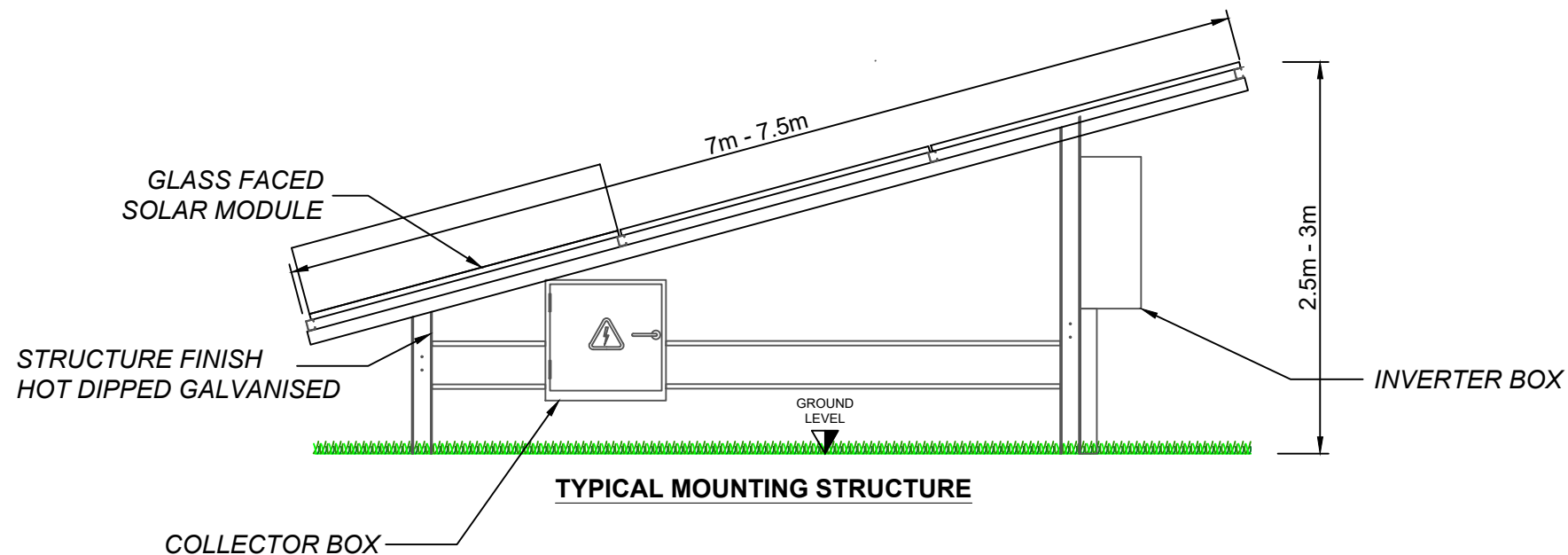
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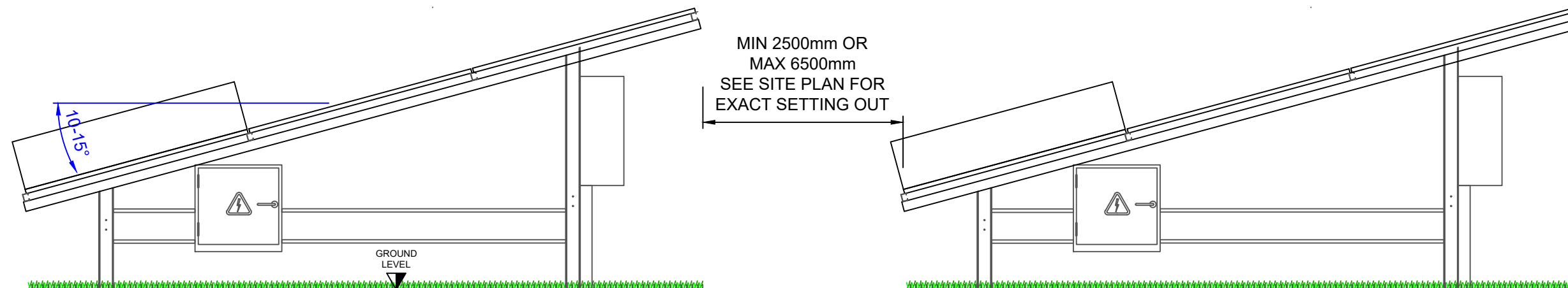
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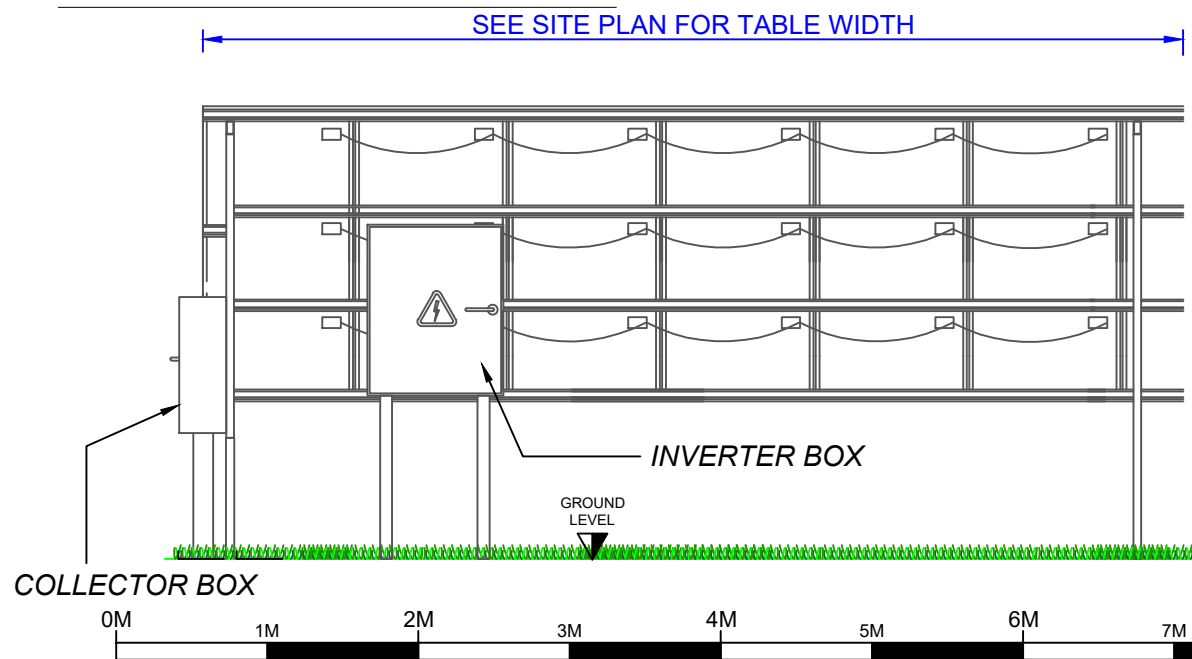
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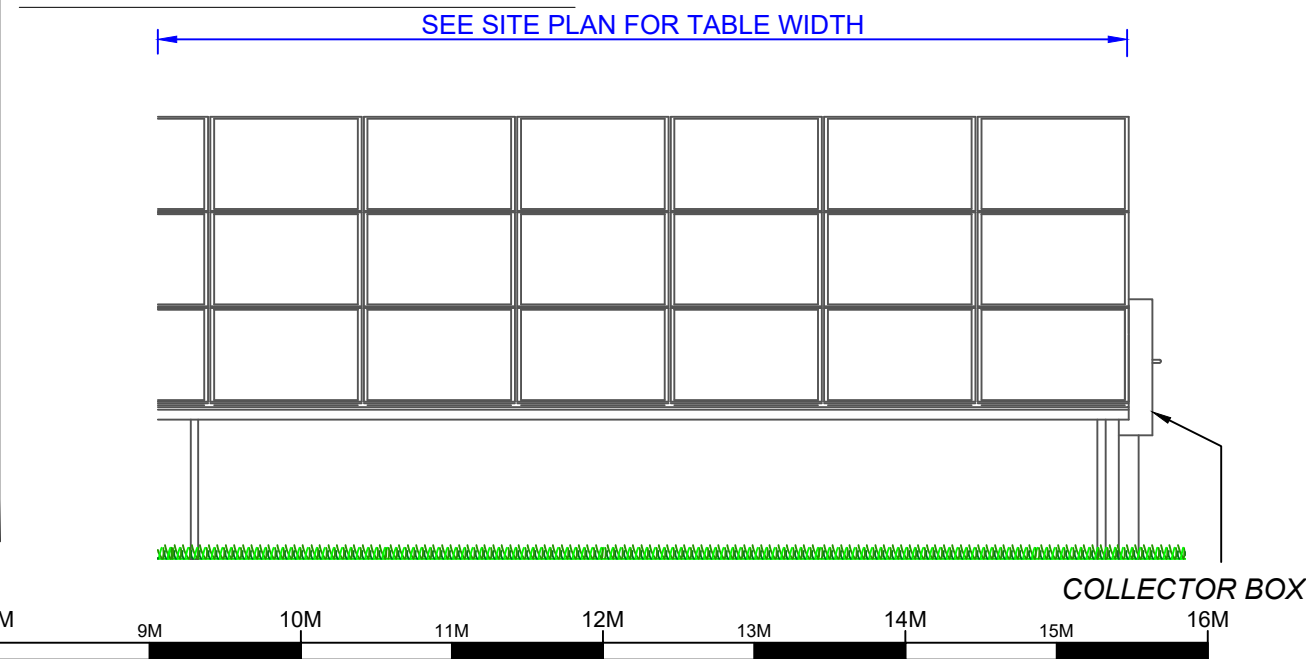
TYPICAL SETTING OUT



TYPICAL NORTH ELEVATION



TYPICAL SOUTH ELEVATION



SITE : GREAT HARMESTON

TITLE : MOUNTING STRUCTURE

LOCATION : LAND EAST & WEST OF JUNCTION OF MILFORD ROAD A4076 A477, JOHNSTON SA62 3HL

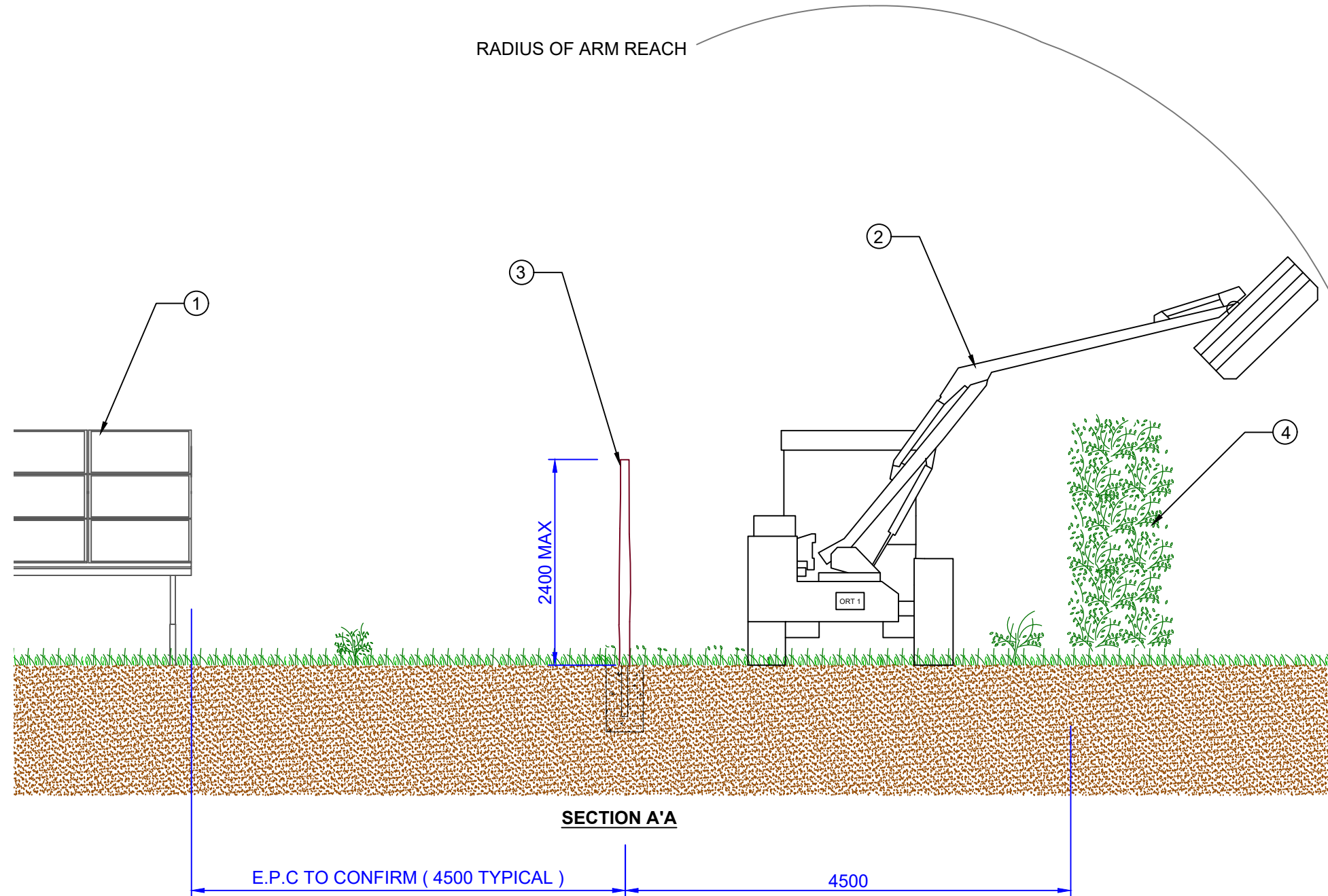
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DRAWING NUMBER : FSF-RHL-V1-00-CM-Y-0013-S0-P02

DO NOT SCALE FROM DRAWING, USE ANNOTATED DIMENSIONS ONLY

- ① = GLASS FACED PV MODULE
- ② = TRACTOR WITH MOVING HEAD
- ③ = FENCING
- ④ = EXISTING BOUNDARY HEDGEROW



SITE : GREAT HARMESTON

TITLE : PERIMETER MAINTENANCE

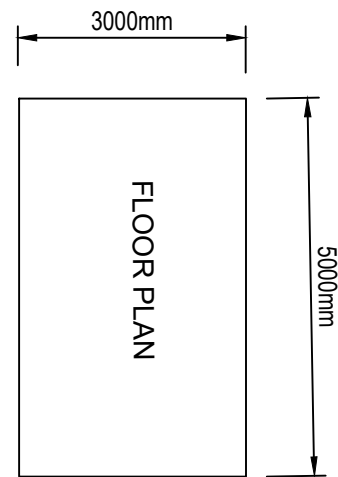
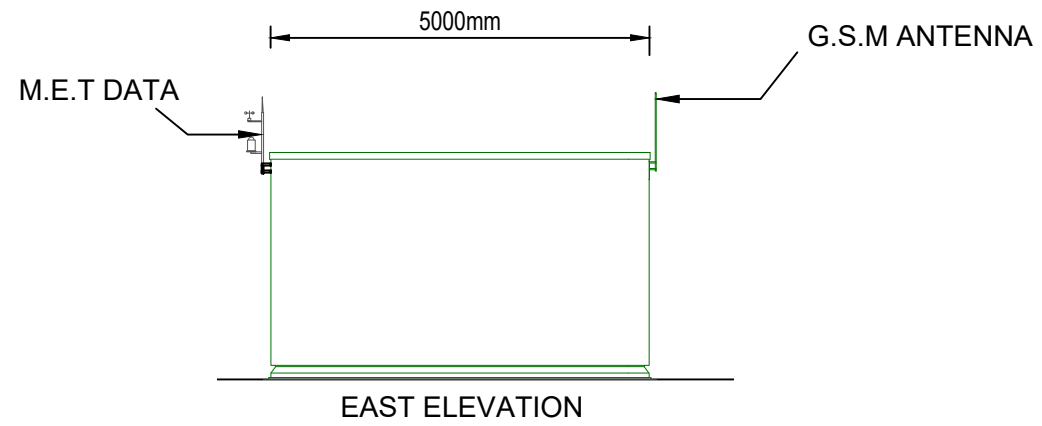
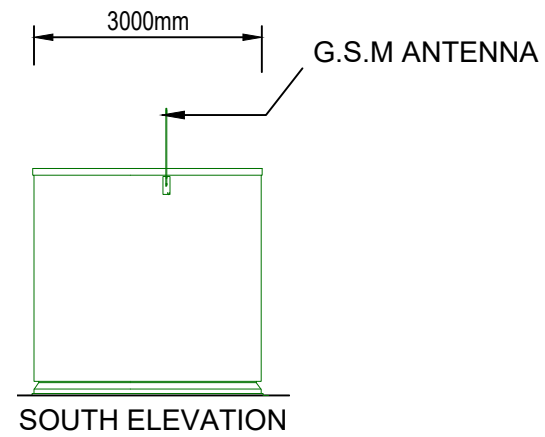
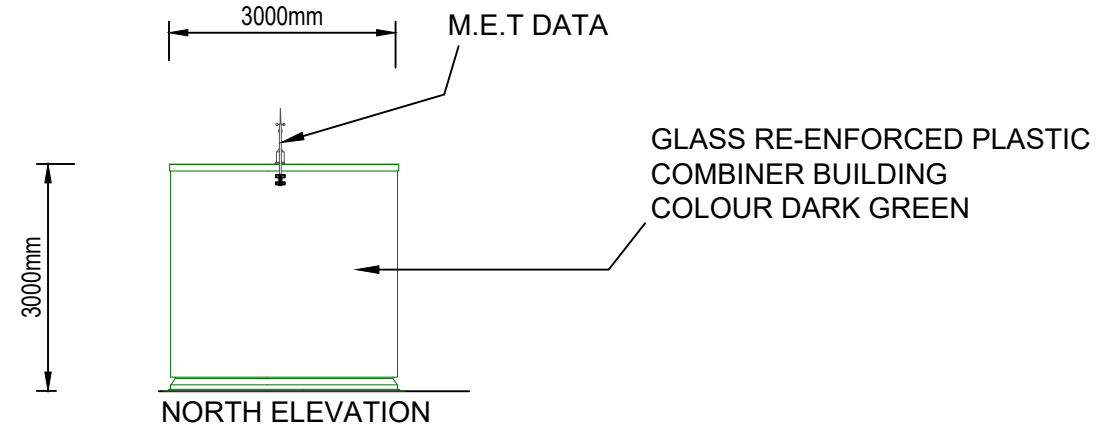
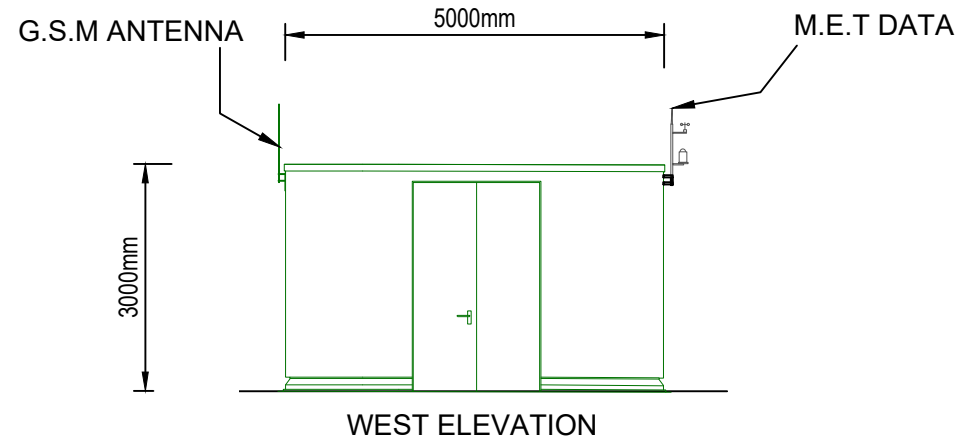
LOCATION :
LAND EAST & WEST OF
JUNCTION OF
MILFORD ROAD
A4076 A477,
JOHNSTON SA62 3HL

STATUS : PLANNING

SCALE : 1:50@A3 DATE : JUN 24

DRAWING NUMBER : FSF-RHL-V1-00-CM-Y-0014-S0-P01

DO NOT SCALE FROM DRAWING, USE ANNOTATED DIMENSIONS ONLY



SITE : GREAT HARMESTON

TITLE : SITE SUBSTATION

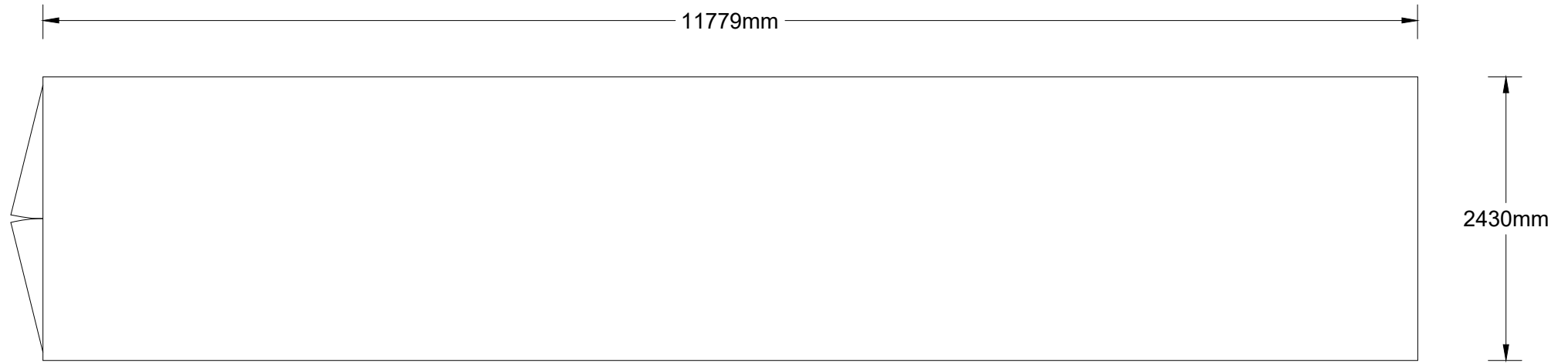
LOCATION :
LAND EAST & WEST OF
JUNCTION OF
MILFORD ROAD
A4076 A477,
JOHNSTON SA62 3HL

STATUS :
PLANNING

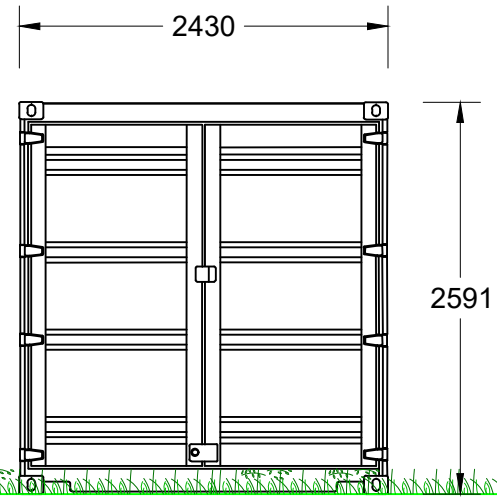
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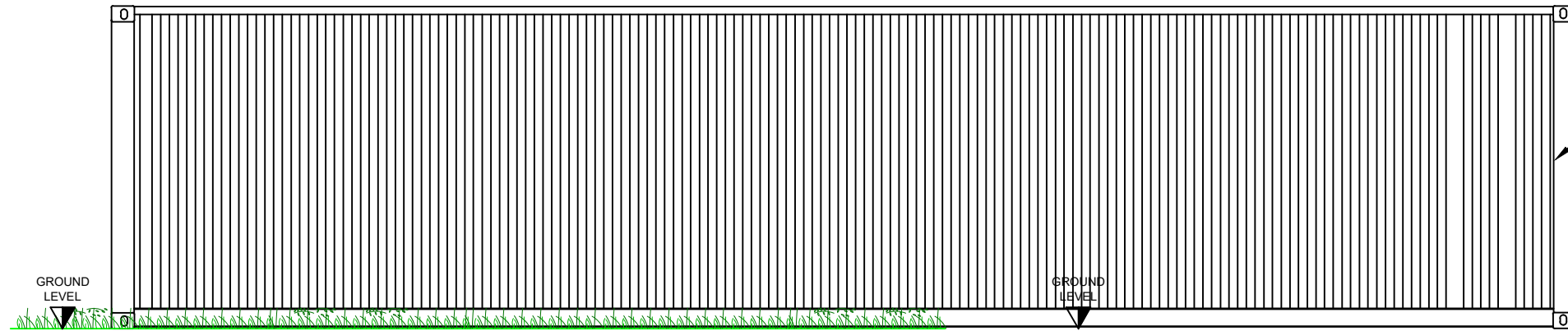
DO NOT SCALE FROM DRAWING, USE ANNOTATED DIMENSIONS ONLY



FLOOR PLAN



FRONT ELEVATION



SIDE ELEVATION

REAR ELEVATION

COLOUR: GREEN



SITE : GREAT HARMESTON

TITLE : SITE STORAGE

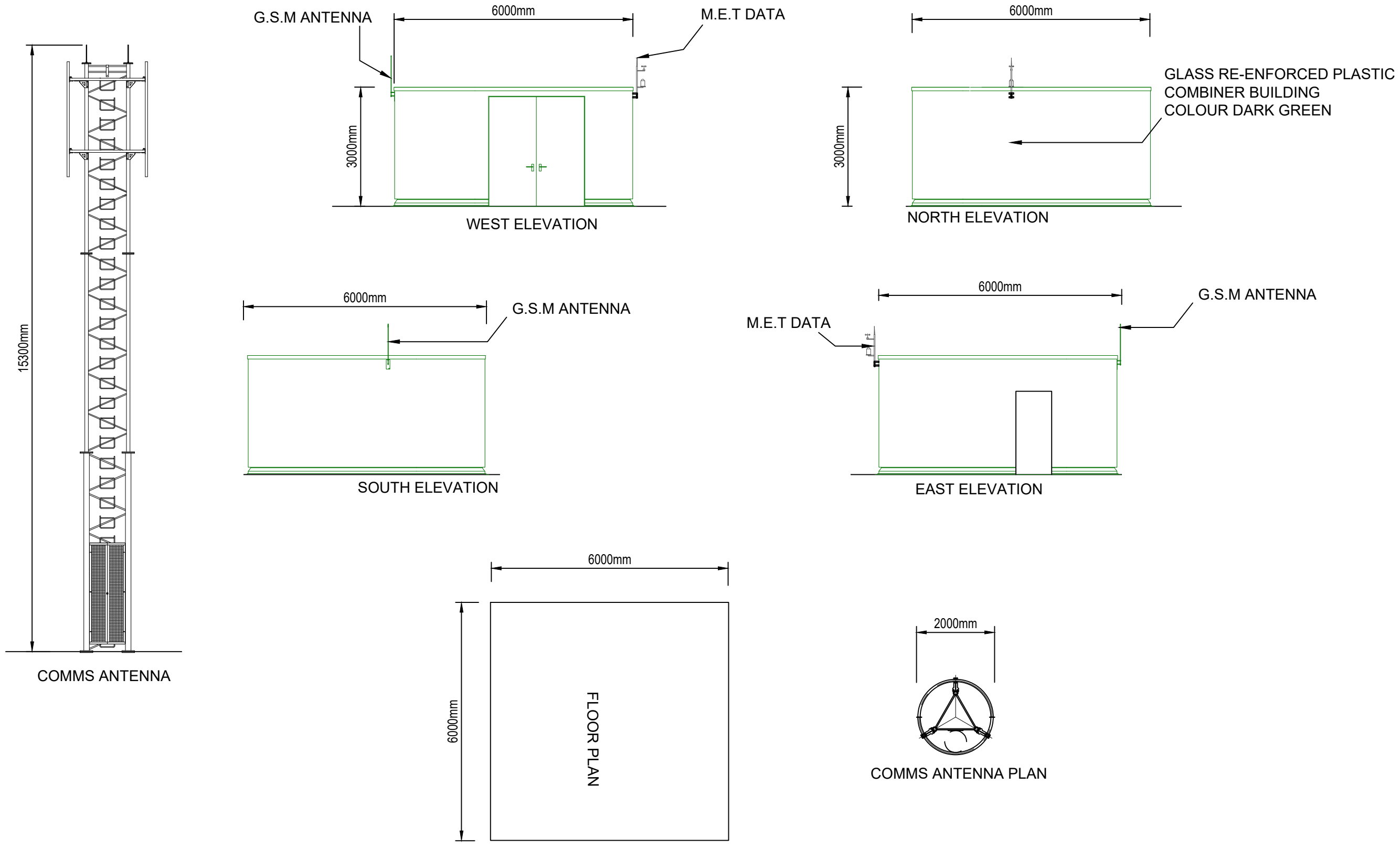
LOCATION :
LAND EAST & WEST OF
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MILFORD ROAD
A4076 A477,
JOHNSTON SA62 3HL

STATUS :
PLANNING

SCALE : 1:50@A3 DATE : JUN 24

DRAWING NUMBER :
FSF-RHL-V1-00-CM-Y-0016-S0-P01

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TITLE :		DNO SUB
STATUS :		PLANNING
SCALE :	DATE :	1:50@A3 JUN 24
DRAWING NUMBER :		FSF-RHL-V1-00-CM-Y-0017-S0-P01

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Bristol

First Floor, South Wing, Equinox North,
Great Park Road, Almondsbury, Bristol, BS32 4QL
T 01454 625945
E Bristol@pegasusgroup.co.uk
Offices throughout the UK.

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