



# Great Harmeston Solar Farm Environmental Statement

Technical Appendix 1.1  
PEDW Screening Direction



Adeilad y Goron,  
Parc Cathays, Caerdydd,  
CF10 3NQ

Crown Buildings,  
Cathays Park,  
Cardiff, CF10 3NQ

Ein Cyf / Our Ref: DNS CAS-04538-H9C9V8

Dyddiad / Date: 03/10/2025

Ffôn / tel: 0300 123 1590

Ebost / email: [PEDW.Infrastructure@gov.wales](mailto:PEDW.Infrastructure@gov.wales)

Dear Annabel Roberts

**Town and Country Planning Act 1990**  
**The Developments of National Significance (Procedure) (Wales) Order 2016**  
**Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017**

**Potential DNS Application**

**Site Address:** Land at Great Harmeston, Pembrokeshire, SA62 3HM

**Proposed Development:** The installation and operation of a renewable energy generating station comprising ground-mounted photovoltaic solar arrays, together with substation, switchgear container, inverter / transformer units, site access, internal access tracks, security measures, access gates, other ancillary infrastructure and landscaping and biodiversity enhancements.

On 27 August 2025 Planning and Environment Decisions Wales (PEDW) received a request made under regulation 31(1) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (“the Regulations”), for the Welsh Ministers to make a screening direction as to whether or not the development proposed is “EIA Development” within the meaning of the Regulations.

PEDW is authorised by the Welsh Ministers to provide that screening direction.

The project, as described above, falls within the description at paragraph 3(a) in column 1 of the table in Schedule 2 to the Regulations.

As the proposal is a potential Development of National Significance (DNS) application, the attached screening assessment identifies the key areas which have been considered. Having taken into account the selection criteria in Schedule 3 to the Regulations and the advice in Welsh Office Circular 11/99: Environmental Impact Assessment on establishing whether EIA is required, the assessment concludes that:

The proposal is seeking to install a solar farm, substation and associated infrastructure, with a generating capacity of up to 93 MW, extending to approximately 128 ha across a number of land parcels. Given the appropriate conditions and mitigation, significant effects on water resources are considered to be unlikely. The implementation of a

Rydym yn croesawu gohebiaeth Gymraeg. Cewch ateb Cymraeg i bob gohebiaeth Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome correspondence in Welsh. Correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not involve any delay.

Construction Environmental Management Plan, Construction Traffic Management Plan and Dust Monitoring and Management Plan, secured by condition could mitigate against the potential risk of pollution, land contamination, noise, vibration and dust.

However, concerns have been raised by consultees about the potential effects of the proposed development in relation to the historic environment, ecology, as well as landscape and visual impacts on nearby sensitive receptors. Due to insufficient information currently being available in relation to these effects, it is not possible to rule out significant effects at this stage. The potential for cumulative effects is also considered to be significant, as within 3 km of the site there are a number of solar farms (either existing, under construction or proposed) as well as the construction of 56 holiday lodges. Furthermore, although it is proposed for a Glint and Glare Assessment to accompany the planning application, no evidence has currently been provided to demonstrate impacts from glint and glare would not be significant on amenity of residents or in relation to the nearby roads and railway.

I therefore consider that significant effects in relation to these matters are likely. The proposal is therefore EIA development.

Therefore, in exercise of the powers conferred by the Regulations and the authority referred to above, the Welsh Ministers hereby direct that the development subject of this application **is EIA development** within the meaning of the Regulations.

Consequently, this application must be accompanied by an Environmental Statement. Under regulation 17(1) of the Regulations an Environmental Statement must contain, for the purpose of assessing the likely impact on the environment, the information specified in that regulation. It is recommended that you refer to the Regulations and the accompanying Circular, Welsh Office Circular 11/99, before and during the preparation of the Environmental Statement. In the meantime, you may wish to have regard to the particular environmental topics identified in the attached screening assessment.

This letter will be copied to Pembrokeshire County Council, so that this screening direction is placed on Part 1 of the Planning Register in relation to the application in question, in accordance with the Regulations.

Yn gywir / Yours sincerely

*Marloes Holtkamp*

Marloes Holtkamp  
Swyddog Cynllunio | Planning Officer  
Penderfyniadau Cynllunio ac Amgylchedd Cymru | Planning and Environment Decisions Wales  
Llywodraeth Cymru | Welsh Government

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## STAGE 1 – INITIAL EIA SCREENING ASSESSMENT

1 Case Details	
A	Case reference DNS CAS-04538-H9C9V8 - Great Harmeston Solar Farm
B	Brief description of development The installation and operation of a renewable energy generating station comprising ground-mounted photovoltaic solar arrays, together with substation, switchgear container, inverter / transformer units, site access, internal access tracks, security measures, access gates, other ancillary infrastructure and landscaping and biodiversity enhancements.
2 EIA Screening Details	
2A Schedule 1	
	Is the project Schedule 1 development as described in Schedule 1 of the EIA Regulations? <span style="float: right;">No</span>
	<i>If Yes, under which description of development? If No, consider whether project is 'Schedule 2' development below in part 2(B).</i>
2B Schedule 2	
(i)	Is the project listed as a description of development under Column 1 of Schedule 2 of the EIA Regulations? <span style="float: right;">Yes</span> <i>If Yes, under which description of development? If No, EIA is not required.</i>
	3(a) - Industrial installations for the production of electricity, steam and hot water
(ii)	Does the project change or extend development described in paragraphs 1 to 12 of Column 1 of schedule 2, where the change or extension may have SIGNIFICANT* adverse effects on the environment? <span style="float: right;">No</span> <i>If Yes, provide reasons for your answer below. *If unsure, discuss with PET. Proceed to point (iii).</i>
	N/A - not a change or extension
(iii)	Is the project located wholly or partly within a ' <a href="#">Sensitive Area</a> ' as defined by Regulation 2 of the EIA Regulations? <span style="float: right;">No</span> <i>If Yes, state which area and more to Question 3. If No, proceed to point (iv) below.</i>
(iv)	Are the applicable thresholds/criteria in Column 2 exceeded / met? <span style="float: right;">Yes</span> <i>If Yes, note which applicable threshold/criteria. If No, EIA is not required.</i>
	The site is approximately 128 ha and therefore exceeds the threshold of 0.5 ha.
3 LPA / Welsh Ministers' Screening	
(i)	Has the LPA issued a Screening Opinion (SO)? <span style="float: right;">No</span>
(ii)	Have the Welsh Ministers issued a Screening Direction (SD)? <span style="float: right;">No</span>

4 Environmental Statement (ES)	
	Has the applicant/appellant supplied an ES for the current or previous (if reserved matters or conditions) application? No

**Is a detailed screening assessment (Section 5) required?**  
 If Yes has been answered in response to either 2B(iii) or 2B(iv), send to relevant team to undertake detailed screening assessment.  
 If No has been answered for both questions, or the questions are not applicable, start appeal.

Sign-off	
<b>Signature</b>	Marloes Holtkamp MSc
<b>Date</b>	19/09/2025

## **STAGE 2 – DETAILED EIA SCREENING ASSESSMENT**

As per Schedule 3, Para 3: When considering the potential impact, take into account; (a) magnitude / spatial extent / population likely to be affected; (b) nature of impact; (c) transboundary nature; (d) intensity & complexity; (e) probability; (f) expected onset / duration / frequency & reversibility; (g) cumulation with existing and / or approved development; (h) the possibility of effectively reducing the impact.

<b>5 Detailed Screening Questions</b>		
Questions to be considered	Yes/No/Unknown – provide description	For ‘Yes/Unknown’, are effects <b>likely</b> to be <b>significant</b> ? <i>Include consideration of features or measures to avoid or prevent what might otherwise be significant effects</i>
<b>CRITERION 1. CHARACTERISTICS OF DEVELOPMENT</b>		
<b>Question 1(a) Size and design of the Development</b>		
<p>Will construction, operation or decommissioning of the Project involve actions which will cause physical changes in the locality (topography, land use, changes in waterbodies, etc.)?</p>	<p>The proposal is for the installation of a solar farm, substation and associated infrastructure, with an installed generating capacity of up to 93 MW peak. The site extends to approximately 128 ha across a number of land parcels. The point of connection is on-site, through a buried underground cable connecting to an overhead power line pole within the site boundary.</p> <p>The SR states that the site predominantly comprises arable land, cattle grazing and silage production. The land use will change from agricultural and arable fields to host solar arrays and associated infrastructure. The Screening Report (SR) confirms that the solar farm will be designed to accommodate sheep grazing beneath and between the rows of panels. The lifespan of the scheme is 40 years, after which the infrastructure will be removed from site and could be restored to its former agricultural use.</p> <p>Given these considerations, whilst there would be physical change during the lifetime of the development, I do not consider there to be significant effects in EIA terms.</p>	<p>Significant effects <b>unlikely</b>.</p>

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be significant?
<b>Question 1(b) Cumulation with Existing and/or Approved Development</b>		
<p>Are there any other factors which should be considered such as:</p> <ul style="list-style-type: none"> <li>consequential development which could lead to environmental effects?</li> <li>the potential for cumulative impacts with other existing or planned activities in the locality?</li> <li>any plans for future land uses on or around the location which could be affected by the project?</li> <li>transfrontier impacts?</li> </ul>	<p>Yes. The SR identifies a number of nearby solar farms, either existing, under construction or proposed, as well as the erection of 56 holiday lodges approximately 1.5 km north of the site.</p> <p>Given the scale and location of these (within 3 km of the site), and the scale of the proposed development, I consider that there is potential for cumulative impacts to be significant. This includes, but is not limited to, landscape and visual, historic environment, ecology and traffic impacts during the construction, operational and decommissioning phases.</p> <p>The information currently available with regard to cumulative impacts is insufficient to rule out significant effects in this respect.</p>	Significant effects <b>likely</b> .
<b>Question 1(c) Use of Natural Resources, in particular land, soil, water and biodiversity</b>		
<p>Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or in short supply?</p>	<p>Yes. The development will use some resources during construction and decommissioning, but nothing which is likely in short supply.</p> <p>The panels would occupy some Best and Most Versatile (BMV) agricultural land, with grade 2 and 3a BMV agricultural covering approximately 16 ha. I note that the Welsh Government's Land Quality Advice Service (LQAS) advises the total area of BMV potentially impacted by the proposal could be significant and raises concerns about the cumulative impacts to BMV land.</p> <p>I note the SR states appropriate construction techniques would be implemented to avoid the loss of soil and that a soil resource management plan</p>	Significant effects <b>unlikely</b> .

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be significant?
	<p>will be submitted as part of the planning application. The Applicant should note the comments from LQAS regarding the need to consider impacts to soils, soil functions and services.</p> <p>Given the limited amount of BMV land, the possible mitigation of soil impacts and the nature of the proposed development, I am content that impacts in these respects are not enough to warrant EIA in their own right. However, as this screening indicates EIA is required in other respects, these matters are likely to be addressed in the Environmental Statement in any case.</p>	
<p>Will the Project produce solid wastes during construction or operation or decommissioning?</p>	<p>Yes, waste would be produced during construction and eventual decommissioning. This could be addressed by the Construction Environmental Management Plan (CEMP), which the SR indicates will be adopted, and can be secured by condition. Given this and the nature of the proposed development, I do not consider that significant effects are likely in terms of waste generation.</p>	<p>Significant effects <b>unlikely</b>.</p>
<p><b>Question 1(e) Pollution and Nuisances</b></p>		
<p>Will the Project involve use, storage, transport, handling or production of substances or materials which could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?</p>	<p>No.</p>	<p>N/A</p>
<p>Will the Project cause noise and vibration or release of light, heat energy or electromagnetic radiation?</p>	<p>Yes. Some noise and vibration are likely during construction and decommissioning, which would be localised and time limited and could be controlled via a CEMP. Significant impacts can be mitigated</p>	<p>Significant effects <b>likely</b>.</p>

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Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be significant?
	<p>through good traffic management and construction practices.</p> <p>The SR states that the planning application will be accompanied by a Noise and Vibration Assessment to consider the impact of noise and vibration during the construction and operational phases on existing noise sensitive receptors. Due to the nature of the development, significant operational noise is considered unlikely.</p> <p>During the operational phase there is also potential for redirection of light in terms of glint and glare via the reflective surface of the panels. I note that there are a number of nearby sensitive receptors, including residential. The site also falls within the safeguarding zone for Haverfordwest Airport. I also note the site is segregated by / runs adjacent to two 'A' roads and a railway line. The SR does not provide information on the potential glint and glare impact or any potential mitigation in this respect.</p> <p>Although the SR states that a Glint and Glare Assessment would accompany the application, no evidence has currently been provided to demonstrate impacts on amenity of residents or public safety impacts from glint and glare would not be significant. I am therefore unable to conclude at this stage that significant effects from glint and glare are unlikely.</p>	
<p>Will the Project release pollutants or any hazardous, toxic or noxious substances to <b>air</b>, or lead to risks of contamination of <b>land</b> or <b>water</b> (including surface waters, groundwater, coastal waters or the sea)?</p>	<p>Yes. The SR does not include information relating to the type of solar panels proposed. It is known that some solar panels have the potential to act as sources of leachable quantities of PFAS (per-and polyfluoroalkyl substances) that may enter the</p>	<p>Significant effects <b>unlikely</b>.</p>

5	Detailed Screening Questions	
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	<p>environment over time through general wear and tear interaction as PFAS may be used in the manufacture of solar panels. The potential impact could be mitigated against, such as regular monitoring of the site, which could be secured via condition.</p> <p>The SR confirms the Site is not located within or near an Air Quality Management Area (AQMA). There would however be emissions associated with vehicles during the construction phase. The SR confirms a Transport Statement, Construction Traffic Management Plan (CTMP) and CEMP will be submitted as part of the application. I am satisfied that standard good practice and mitigation measures can be incorporated into these documents, to prevent any significant impacts.</p> <p>Dust generation is also possible during the construction phase. The SR states this can be reduced through the implementation of a Dust Monitoring and Management Plan (DMMP) that can be secured by condition.</p> <p>There are some ponds, ditches and watercourses around and within the site boundary. The SR states a Surface Water Draining Strategy will be provided with the application, ensuring surface water is appropriately managed on the site. Pollution prevention measures can be included in the CEMP to prevent significant effects to local watercourses. The Applicant should note the advice from NRW regarding the content of the CEMP.</p> <p>The site is within an area identified as 'high' for groundwater vulnerability. However, potential</p>	

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be significant?
	<p>contaminants during the construction and decommissioning periods can be controlled through the CEMP.</p> <p>I note that the SR states the site is not known to have any contaminated land, however there is a historic landfill located in the south-east area of the site. The SR states a Phase 1 geo-environmental survey and ground conditions report has concluded no potentially significant geo-environmental hazards or abnormalities have been identified across the majority of the site. A detailed Phase II geo-environmental intrusive investigation has been recommended. NRW states that in the absence of these reports, they cannot rule out the potential for significant environmental effects. NRW are however satisfied that the risks associated with land contamination and controlled waters can be managed by appropriately worded planning conditions. They add that the Applicant must ensure that the structure integrity of any landfill cap is not compromised because of the proposed development.</p> <p>I am satisfied that standard good practice and mitigation measures to be incorporated into a CTMP, CEMP, DMMP and Drainage Strategy, which could be conditioned, would prevent any significant impacts.</p>	
<b>Question 1(f) Risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge</b>		
Will there be any risk of accidents during construction or operation of the Project which could affect human health or the environment?	Yes. Our records indicate there may be major pipelines crossing the site. PEDW recommends the applicant liaises with the Health and Safety Executive and the relevant utilities provider on this	Significant effects <b>unlikely</b> .

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Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be significant?
	<p>matter.</p> <p>There is a small risk of accident during construction, operation or decommissioning. Given the scale and nature of the works, alongside construction best practice measures, such risks are unlikely to be significant.</p>	
<b>Question 1(g) Risks to Human Health (for example due to water contamination or air pollution)</b>		
Will there be any risk to human health during the construction and/or operation of the development	Yes. There is potential risk to air quality or contamination during construction, operation and decommissioning. However, best practice guidance and mitigation measures included within the CTMP, CEMP and DMMP would prevent any significant impacts.	Significant effects <b>unlikely</b> .
<b>CRITERION 2. LOCATION OF DEVELOPMENT</b>		
<b>Question 2(a) Existing and Approved Land Use</b>		
Will the Project result in social changes, for example, in demography, traditional lifestyles, employment?	No.	N/A
Are there any routes or facilities on or around the location, which are used by the public for access to recreation or other facilities, which could be affected by the project?	<p>Yes. A Public Right of Way (PRoW) lies adjacent to the boundary of the south-eastern parcel and runs within the site boundary for a small section along its route. There are also further PRoW near the site. There would inevitably be some visual change for users of these routes.</p> <p>Whilst there are footpaths within the site and wider area, the SR does not indicate that these would be stopped up or otherwise significantly impacted by the development. Visual impact is considered below. I therefore consider that the impact of the proposed development is unlikely to be significant in this matter.</p>	Significant effects <b>unlikely</b> .

5		Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be significant?	
Are there any transport routes which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	<p>Yes. The SR states the site will be served from the A4076 to the north via Haverfordwest for construction, operation and decommissioning purposes, which has onward connections to the A40 / A48 and M4. It adds that there will be a number of separate access points into the site owing to the land parcels being segregated by the A4076 and A477.</p> <p>The SR states that a Transport Statement and CTMP will be submitted as part of the planning application to fully assess and mitigate transport effects.</p> <p>Some impacts would therefore occur during the construction and decommissioning phases. However, these impacts would be temporary and could be managed via a CEMP and CTMP. I therefore do not consider that significant effects are likely.</p>	Significant effects <b>unlikely</b> .	
Is the project located in a previously undeveloped area where there will be loss of greenfield land?	Yes, the site is an existing greenfield site, comprising several agricultural fields. Whilst the development would result in loss of greenfield land, the nature of the development would be such that the land could be largely restored at the end of the scheme's lifespan. As such, significant effects are considered unlikely.	Significant effects <b>unlikely</b> .	
Are there any areas on or around the location occupied by land uses which could be affected by the project, particularly sensitive land uses e.g. hospitals, schools, places of worship, community facilities?	<p>Yes. The nearby village of Johnston has sensitive land uses such as a primary school, place of worship and community facilities. The SR also notes that Milford Haven School is 1.72 km to the south.</p> <p>The only likely effects on these sensitive</p>	Significant effects <b>unlikely</b> .	

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Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be significant?
	receptors are visual. However, as landscape and visual impacts are dealt with below, the direct impact of the solar farm on the activities of the sensitive land uses in question would be minimal. I can therefore conclude that significant effects would be unlikely.	
<b>Question 2(b) Relative Abundance, Availability Quality and Regenerative Capacity of Natural Resources in the Area and its Underground</b>		
Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project?	<p>Yes. Our records show parts of the site are located within aggregate safeguarding zones. However, the nature and type of development proposed would be such that there would be no permanent sterilisation of those resources. Significant effects in this respect are therefore considered unlikely.</p> <p>As indicated above, the site is within an area identified as 'high' for groundwater vulnerability. However, potential contaminants during the construction and decommissioning periods can be controlled through the CEMP and I therefore find significant effects in this respect would be unlikely.</p> <p>As states above, although there is the potential for BMV impacts, I do not consider these to be significant to warrant EIA in its own right.</p>	Significant effects <b>unlikely</b> .
<b>Question 2(c) Absorption Capacity of the Natural Environment</b>		
Are there any other areas on or around the location which are important or sensitive for reasons of their ecology, or are used by protected, important or sensitive species of fauna or flora, which could be affected by the project?	<p>Yes. As noted in the SR the following designated sites are within 3 km of the site:</p> <ul style="list-style-type: none"> <li>• Scoveston Fort Site of Special Scientific Interest (SSSI)</li> <li>• Milford Haven Waterway</li> <li>• Pembrokeshire Marine Special Area of Conservation (SAC)</li> </ul>	Significant effects <b>likely</b> .

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be significant?
	<p>The SR states that the proposed development is not in close proximity to any key designations for bat species with the closest approximately 11.5 km south-east. However, NRW highlights that the SR does not reference that Scoveston Fort SSSI is designated for its population of hibernating greater horseshoe bats, with records of horseshoe roosts in the vicinity of the site.</p> <p>NRW in their response also raises concerns about the impact on the Pembrokeshire Marine SAC and the underpinning Milford Haven Waterway SSSI, in particular in relation to otter, water quality and nutrients. Further information is required to adequately consider significant effects on the features of the protected sites. NRW however adds that providing the impact pathways referenced for the SAC are adequately addressed, the features of the Milford Haven Waterway SSSI will also be adequately safeguarded.</p> <p>In terms of protected species, NRW highlights that currently insufficient evidence has been provided to demonstrate the proposed development will not have a significant effect on otter, water vole, horseshoe bat, barn owl and lapwing.</p> <p>Given these concerns, I conclude that insufficient information is currently available to rule out significant effects on ecology.</p>	
Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?	Yes. There are watercourses on and adjacent to the site and the proposed development site is hydrologically connected to the Pembrokeshire Marine SAC and underpinning Milford Haven Waterway SSSI.	Significant effects <b>unlikely</b> .

5		Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be significant?	
	<p>I am satisfied that standard good practice, pollution prevention and other mitigation measures, which can be incorporated into a CEMP and drainage strategy, would prevent any significant impacts.</p> <p>The Applicant should note the advice from NRW regarding the content of the CEMP.</p>		
Are there any areas or features of high landscape or scenic value on or around the location which could be affected by the project?	Pembrokeshire Coast National Park is located approximately 4 km east and west of the site at its nearest points. However, NRW is satisfied that due to the distance, topography and intervening landscape features and vegetation, the proposed development is not likely to have any impacts on the landscape and sensory qualities of the National Park. I therefore do not consider significant effects likely on features of high landscape or scenic value.	Significant effects <b>unlikely</b> .	
Is the project in a location where it is likely to be highly visible to many people?	<p>Yes. Nearby potential sensitive receptors include residential buildings to the southeast, east, south, and northeast; the village of Johnston to the north, including the Johnston Community Primary School to the east; Milford Haven School to the south; PRoW, the highway network and railway line.</p> <p>PCC considers significant adverse visual and landscape character effects are likely. The LPA notes the substantial spread of the development and wide extent of the Zone of Theoretical Visibility. PCC states there are a number of potential sensitive receptors in the area, most notably from publicly accessible routes including public footpaths.</p> <p>The SR states that there may be some views into the site from the surrounding receptors, but that</p>	Significant effects <b>likely</b> .	

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be significant?
	<p>impacts are unlikely to be significant and can be reduced or mitigated.</p> <p>The SR states that a Landscape and Visual Impact Assessment (LVIA) including photomontages would accompany the planning application. The SR also states that the LVIA will principally need to review the key sensitivities of this landscape, which include its rural character and the nearby sensitive receptors, including residential receptors, PRoW network, as well as road and rail users.</p> <p>However, the current information regarding the extent of the landscape and visual impacts on sensitive receptors and how these would be mitigated is insufficient. Given these considerations, I cannot rule out significant effects in this respect.</p>	
Are there any areas on or around the location which are densely populated or built-up, which could be affected by the project?	<p>Yes. There are a number of settlements in the vicinity, including the village of Johnston immediately north, the village of Steynton 1.1 km south and Milford Haven 2.9 km south of the site.</p> <p>There may be impacts during construction, however these would be temporary in nature and can be controlled through mitigation measures (i.e. CTMP, CEMP).</p> <p>The main impact would be visual and as indicated above, insufficient information is currently available to rule out significant landscape and visual impacts. As such, I am not able to conclude that there would be no significant effects on these built-up areas in EIA terms.</p>	Significant effects <b>likely</b> .

5		Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be significant?	
<p>Are there any areas or features of historic or cultural importance on or around the location which could be affected by the project?</p>	<p>Yes. There are a number of designated historic assets located inside 3 km of the proposed development. Scheduled monument 'PE476 Burnt Mound 170 m S of Jubilee Cottages' abuts the northern boundary of the site.</p> <p>Cadw agrees with the conclusion of the Heritage Note appended to the SR. They note that whilst the proposed development could have adverse impacts on two of the designated historic assets (Scheduled Monument PE476 Burnt Mound 170m S of Jubilee Cottages and Listed Building 82698 Upper Harmeston), if necessary, mitigation measures can be introduced so that these impacts will not be significant.</p> <p>PCC however considers that significant effects on the setting of designated historic assets appears likely, most notably the following Grade II listed assets: Upper Harmeston Cottage, which will be surrounded by solar panels, and Great Harmeston House with its Registered Park and Garden. In respect of the latter, the SR concludes that it would not be affected due to tree coverage, but PCC states this requires further assessment before likely significant effects can be discounted.</p> <p>The Heritage Note also states that the southern tip of the site extends into a Registered Historic Landscape: the Milford Haven Waterway Landscape of Outstanding Historic Interest. It states that further analysis is required to understand how the proposed development may affect its essential historic landscape character components.</p>	<p>Significant effects <b>likely</b>.</p>	

5	Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be significant?
	<p>The SR states a historic environment desk-based assessment will be undertaken, as well as a geophysical survey to detect buried archaeological sites. The SR states that the geophysical survey report will be submitted alongside a Heritage Statement. The Applicant should note Cadw's comments regarding the potential for additional archaeological evaluation to be required, which should be completed before the determination of any application.</p> <p>Notwithstanding that the proposed further assessment will inform mitigation measures, given the comments from PCC and the need for further assessment of effects on the Registered Historic Landscape, I conclude that insufficient information is currently available to rule out significant effects on historic environment grounds.</p>	
Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	No.	N/A
Is the project location susceptible to subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions, which could cause the project to present environmental problems?	Yes. The SR states there are small areas in the south and south-west of the site which are within flood zone 2 and 3, as well as areas predicted to be at risk of surface water flooding. However, NRW find that due to the scale and nature of the small section of the proposed development that falls within the identified flood outline and based on the information in the SR, significant effect regarding flood risk can be ruled out.	Significant effects <b>unlikely</b> .

5		Detailed Screening Questions	
Questions to be considered	Yes/No/Unknown – provide description	For 'Yes/Unknown', are effects <u>likely</u> to be <u>significant</u> ?	
	<p>The SR confirms a Flood Consequence Assessment and surface water drainage strategy will be provided as part of the planning application.</p> <p>Given these considerations, coupled with the ability for conditions to be attached to a decision that will appropriately mitigate any potential impacts, I do not consider that significant effects are likely in this respect.</p>		
Has there already been a failure to meet environmental quality standards that is relevant to the project?	No.	N/A	

**Statement of reasons – insert into Screening Direction**

The proposal is seeking to install a solar farm, substation and associated infrastructure, with a generating capacity of up to 93 MW, extending to approximately 128 ha across a number of land parcels. Given the appropriate conditions and mitigation, significant effects on water resources are considered to be unlikely. The implementation of a Construction Environmental Management Plan, Construction Traffic Management Plan and Dust Monitoring and Management Plan, secured by condition could mitigate against the potential risk of pollution, land contamination, noise, vibration and dust.

However, concerns have been raised by consultees about the potential effects of the proposed development in relation to the historic environment, ecology, as well as landscape and visual impacts on nearby sensitive receptors. Due to insufficient information currently being available in relation to these effects, it is not possible to rule out significant effects at this stage. The potential for cumulative effects is also considered to be significant, as within 3 km of the site there are a number of solar farms (either existing, under construction or proposed) as well as the construction of 56 holiday lodges. Furthermore, although it is proposed for a Glint and Glare Assessment to accompany the planning application, no evidence has currently been provided to demonstrate impacts from glint and glare would not be significant on amenity of residents or in relation to the nearby roads and railway.

I therefore consider that significant effects in relation to these matters are likely. The proposal is therefore EIA development.

6		Outcome of assessment	
(ii)	If a SO/SD has been provided do you agree with it?	N/A	
(iii)	Is EIA required?	Yes	

Outcome	Action	✓
Schedule 2 development – threshold exceeded/ criterion met or Sensitive Area <b>and likely</b> to have significant effects	Issue direction stating EIA Required ( <b>Letter 2</b> )	✓
<b>Name and Job Title of Assessor</b>	Marloes Holtkamp MSc Planning Officer	
<b>Date of Assessment</b>	30/09/2025	

# **Appendix 1: Consultation Responses**

Date · Dyddiad 11/9/2025

Your ref · Eich cyfeirnod DNS CAS-04538-H9C9V8

My ref · Fy nghyfeirnod CO/0280/25

Telephone · Ffôn

Email · Ebost [Planning.support.team@pembrokeshire.gov.uk](mailto:Planning.support.team@pembrokeshire.gov.uk)

[www.pembrokeshire.gov.uk](http://www.pembrokeshire.gov.uk) / [www.sir-benfro.gov.uk](http://www.sir-benfro.gov.uk)



Pembrokeshire County Council  
Cyngor Sir Penfro

WILL BRAMBLE CBE.  
Chief Executive / Prif Weithredwr

RICHARD BROWN  
Assistant Chief Executive  
Cynorthwyol Brif Weithredwr

Pembrokeshire County Council,  
County Hall, HAVERFORDWEST,  
Pembrokeshire, SA61 1TP

Cyngor Sir Penfro,  
Neuadd y Sir, HWLFFORDD,  
Sir Benfro, SA61 1TP

Telephone / Ffôn 01437 764551

Please ask for  
Os gwelwch yn dda gofynnwch am

## Planning and Environment Decisions Wales

By email only:

[PEDW.Infrastructure@gov.wales](mailto:PEDW.Infrastructure@gov.wales)

Dear Sir / Madam

Proposal: **Installation and operation of a renewable energy generating station comprising ground-mounted photovoltaic solar arrays, together with substation, switchgear container, inverter/transformer units, site access, internal access tracks, security measures, access gates, other ancillary infrastructure and landscaping and biodiversity enhancements**

Location: **Land at Great Harmeston, Pembrokeshire, SA62 3HM**

Planning and Environment Decisions Wales (PEDW) consulted Pembrokeshire County Council local planning authority (the LPA) on 28<sup>th</sup> August 2025 requesting the LPA's comments to inform PEDW's consideration of the request for an EIA Screening Direction in respect of the above proposed development. As such, the LPA submit the following comments.

The Development is not within a "sensitive area" as defined in the EIA Regulations. The Development is for an industrial installation for the production of electricity as prescribed in part 3(a) of Schedule 2 of the EIA Regulations. The Development is therefore a Schedule 2 development. The relevant issue in determining whether EIA is required is whether the Development is likely to have significant effects on the environment. Schedule 3 provides the "selection criteria" for this purpose. Schedule 2 provides thresholds to assist consideration of "significance". The Development exceeds the applicable threshold/criteria indicated in column 2 of part 3(a).

The Development is significant in scale and could be construed as one that is of more than local importance. Nevertheless, there are unlikely to be complex or potentially hazardous environmental effects. The generation of waste would be limited. Matters relating to contamination are unlikely to be significant. There would be limited use of natural resources (no more than within normal parameters

for such development). Pollution & other nuisances' post-development would be limited. Transportation impacts are unlikely to result in significant environmental effects. Impacts in relation to natural resources and human health are unlikely to be significant and this includes the effects from pollution (including noise, air and water quality). There are unlikely to be significant adverse effects in relation to the potential for major accidents/disasters nor is there evidence that such effects are likely due to climate change.

Mitigation would nevertheless be required in order to avoid/prevent what otherwise could be significant effects on the environment in respect of the above matters. Such mitigation would primarily comprise design mitigation embedded in the details of the Development as well as method statements to ensure construction and decommissioning proceeds without any significant environmental effects.

The Development would result in the loss of agricultural land, and it is stated that approximately 16 hectares of the Best and Most Versatile Agricultural would be affected. For screening purposes, the LPA defer to the Agricultural Land Use & Soil Policy Unit (Welsh Government) on this matter.

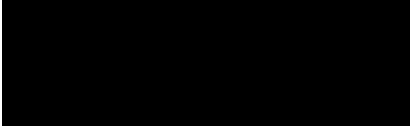
Notwithstanding the above, the LPA consider that the Development is likely to give rise to significant environmental effects in relation to the following matters:

- a. Significant adverse visual and landscape character effects are likely. The substantial spread of the development is noted. There are a number of potential sensitive receptors in the area, most notably from publicly accessible routes including public footpaths. The wide extent of the Zone of Theoretical Visibility is also noted.
- b. The EIA Screening Report identifies 10 Listed Buildings, a Registered Park and Garden, one scheduled monument and the Milford Haven Waterway Landscape of Outstanding Historic Interest within a 1km radius of the site. Significant effects on the setting of designated historic assets appears likely, most notably Upper Harmeston Cottage (Grade II listed) (this property would be surrounded by the solar panels) and Great Harmeston House (Grade II) with its Registered Park and Garden (also Grade II). In respect of the latter, the EIA Screening Report concludes that it would not be affected due to tree coverage, but this requires further assessment before likely significant effects can be discounted. It is noted that PEDW have also consulted Cadw who will comment further in respect of the likely effects on the Milford Haven Waterway Landscape of Outstanding Historic Interest and scheduled monuments.
- c. There are nearby existing similar developments that would, having regard to in-combination impacts, may be likely to result in the Development having significant adverse cumulative environmental effects. These developments are referenced in the EIA Screening Report. These significant adverse cumulative environmental effects would relate to visual and landscape, and ecological considerations. Fragmentation in the landscape with potential to create a 'barrier' effect to the detriment of biodiversity is a significant concern, as is the cumulative visual as well as landscape character impact that has the potential to be significantly adverse.

The Development is therefore, for the above reasons, when considered against Schedule 3 criteria, likely to give rise to significant effects on the environment having regard to the characteristics of the development, the environmental sensitivity of the location, and the characteristics of the potential impact. It is the LPA's view that the above matters are of such significance to require EIA under Schedule 2.

I trust that this consultation response is beneficial but please contact me if you have any queries.

Yours sincerely



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

Planning & Environment Decisions Wales  
PEDW  
Crown Buildings  
Cathays Park  
Cardiff  
CF10 3NQ

Dyddiad/Date: 24 September 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: THE INSTALLATION AND OPERATION OF A RENEWABLE ENERGY GENERATING STATION COMPRISING GROUND-MOUNTED PHOTOVOLTAIC SOLAR ARRAYS, TOGETHER WITH SUBSTATION, SWITCHGEAR CONTAINER, INVERTER/TRANSFORMER UNITS, SITE ACCESS, INTERNAL ACCESS TRACKS, SECURITY MEASURES, ACCESS GATES, OTHER ANCILLARY INFRASTRUCTURE AND LANDSCAPING AND BIODIVERSITY ENHANCEMENTS.**

**LLEOLIAD/LOCATION: GREAT HARMESTON SOLAR FARM, HAYSTON ROAD, JOHNSTON, HAVERFORDWEST, SA62 3HH.**

Thank you for your letter dated 04 September 2025 requesting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales' (NRW) views on whether the above proposed development is likely to have a significant environmental effect.

We have considered the information provided in the Environmental Impact Assessment Screening Report, prepared on behalf of Arise Renewable Energy UK Ltd by Pegasus Group, dated 27/08/2025 and referenced P24-1037.

Based on the information provided, we consider that the proposed development is likely to have adverse effects on the environment. However, considering the information available to us we cannot confirm the significance of these effects. We therefore cannot rule out that these effects may be significant. Our view on the likelihood of significant effect on each of the environmental interests under our remit are set out below:

### **Protected Sites**

The proposed development site is within 3km of the following protected sites:

- Scoveston Fort Site of Special Scientific Interest (SSSI)
- Milford Haven Waterway SSSI
- Pembrokeshire Marine Special Area of Conservation (SAC)

## Scoveston Fort Site of Special Scientific Interest (SSSI)

As identified within the Screening Report, Scoveston Fort SSSI is approximately 2.3km from the site. However, the Screening Report does not reference that this site is designated for its population of hibernating greater horseshoe bats. There are records of horseshoe roosts in the vicinity of the site and additional information would need to be provided to demonstrate the proposals will not have a significant effect on greater horseshoe bats.

## Milford Haven Waterway SSSI and Pembrokeshire Marine SAC

We have concerns that harm from the proposed development on Pembrokeshire Marine SAC and the underpinning Milford Haven Waterway SSSI cannot be ruled out. We advise that further information, as outlined below, is required to adequately consider the potential impacts on the features of the protected sites.

Please note that providing the impact pathways referenced for the SAC are adequately addressed, NRW consider the features of the Milford Haven Waterway SSSI will also be adequately safeguarded

### *Otter*

Otter are a feature of the Pembrokeshire Marine SAC. The site is hydrologically connected to the SAC and there are records of otter on these watercourses. Aerial photography also indicates the presence of wide riparian woodland corridors. We therefore consider that sufficient evidence is needed to demonstrate the proposals will not have a significant effect on otter. Further detail is provided in the Protected Species - Otter section below.

### *Water quality - Construction*

The proposed development site is hydrologically connected to the Pembrokeshire Marine SAC and underpinning Milford Haven Waterway SSSI. Detailed consideration will need to be given to pollution prevention measures to be implemented during the construction phase. Further detail on a suitable Construction Environmental Management Plan is provided in the Construction Phase section below.

### *Nutrients*

NRW has published updated conservation advice packages (Regulation 37 advice) for the marine SACs and Special Protection Areas (SPAs). The proposed development falls within the Milford Haven Inner (Pembrokeshire Marine SAC) waterbody catchment. This waterbody has been identified as having sensitive features, where nutrient inputs from freshwater catchments may be contributing to a failure to meet the site's conservation objectives. No detail has been provided within the Screening Report to confirm whether welfare facilities will be provided during the construction and/or operational phases of the project. Please note that a conclusion of no adverse effect on site integrity may only be drawn where any plans or projects in these areas with the potential to increase nutrient discharges can secure appropriate mitigation and demonstrate nutrient neutrality for nitrogen.

## **Protected Species**

The Screening Report indicates that an Extended Phase 1 Habitat survey has been undertaken alongside other protected species surveys. These reports have not been included in support of the Screening Report and in their absence, we cannot rule out the potential for the development to have significant environmental effects.

### Otter

There are records of otter on the river between the proposed development site and the Pembrokeshire Marine SAC. A Phase 1 habitat map was not provided for review however, based on the habitat descriptions within the Screening Report we note that there are watercourses on site and woodland blocks on/adjacent to the site. Aerial photography also indicates the presence of wide riparian woodland corridors.

The Screening Report has scoped out otter from further consideration however, given that otter are a feature of the Pembrokeshire Marine SAC, there are records in the area and the presence of watercourses on and adjacent to site, we consider there is currently insufficient evidence to demonstrate the proposals will not have a significant effect on otter.

We advise that the potential impacts on otter are considered further including survey for the presence of otter, and an assessment of the suitability of habitat on and adjacent to site to support otter resting and breeding sites.

### Water Vole

There are limited records of water vole in the vicinity however, as noted above there are watercourses on and adjacent to the site and wooded riparian corridors. We advise that further information would be required to demonstrate the scheme is unlikely to impact on this species.

### Bats

From the Screening Report, we note that the bat activity surveys undertaken recorded low bat activity of predominately common species. However, this does suggest that there is some use of the site by rarer bat species, which could include greater horseshoe bats. Whilst we welcome the proposals to retain and safeguard field boundaries, hedgerows and boundary trees, and proposed controls on lighting through a Construction Environmental Management Plan, we advise additional information is needed to demonstrate the scheme is unlikely to have significant effect on horseshoe bat species, or their foraging and commuting habitats.

### Great Crested Newt

We note the lack of records around the site and the supporting survey results which demonstrate the likely absence of Great Crested Newts. We do not consider that the proposed development will have a significant effect on this species and welcome the proposals to retain and safeguard habitats on site, measures to control lighting and pollution prevention.

## Dormice

We note the lack of records in the area and welcome the retention and safeguarding of field boundaries, hedgerows and boundary trees on site. We are satisfied that the proposed development is not likely to cause a significant impact on dormice however, we welcome the proposed control of measures, such as lighting, through a Construction Environment Management Plan (this is covered under the Construction section below).

## Birds

The site may have potential to support breeding barn owls and without species-specific survey for barn owls during the breeding season we cannot rule out the potential for the development to have significant environmental effects. Surveys should be undertaken to assess the impacts of the scheme on foraging barn owls and identify the potential for breeding barn owls on site. We refer the applicant to [Barn Owl Survey Methodology and Techniques for use in Ecological Assessment | CIEEM](#).

The habitats on site may also have the potential to support breeding lapwing. Lapwing is a species of high conservation concern; owing to severe short-term and long-term decline of the breeding population Lapwing is listed under Section 7 of the Environment (Wales) Act 2016, and Red-listed in Wales ([BoCCW4](#)). There are estimated to be fewer than 1000 breeding pairs of Lapwing in Wales (Pritchard et al. 2021). Schemes involving solar development should first seek to avoid development of fields identified as containing breeding lapwing and follow the DECCA principals laid out in PPW 12.

Any surveys undertaken should be in line with industry best practice (see [Bird Survey Guidelines](#)). Additional, species-specific surveys may also be required and should be informed by the habitat on site as well as the results of any desktop surveys. The methods can be species specific and may require different timings (both during the day/night and seasonally). Surveys for birds during the non-breeding season may also be required; this again should be informed by the result of desktop surveys.

Determining the importance of species and populations identified from surveys should refer to Wales specific resources and publications where practical. Relevant population estimates can be found in, but not limited to, [Hughes et al. 2020](#) (Wales), [Birds of Wales/Adar Cymru](#) (Pritchard et al. 2021), [Woodward et al. 2020](#) (UK/Britain), and the [UK Rare Breeding Birds Panel](#). County Bird Reports, and the Welsh Bird Reports may also contain relevant information.

Reference should also be made to [Birds of Conservation Concern Wales 4 \(BoCCW4\) as well as listing on Section 7 of the Environment Act \(Wales\) 2016, and Schedule 1 of the Wildlife & Countryside Act 1981 \(as amended\)](#).

## **Groundwater and Contaminated Land**

We understand that there are two historic landfills within the boundary of the proposed development. The Screening Report details that a Phase 1 geo-environmental survey and ground conditions report have been carried out and that a further Phase II geo-environmental intrusive investigation has been recommended. These reports have not been included in support of the Screening Report and in their absence, we cannot rule out the potential for the development to have significant environmental effects.

Notwithstanding the above and based on the information available we are satisfied that the risks associated with land contamination and controlled waters can be managed by appropriately worded planning conditions. However, the applicant must ensure that the structure integrity of any landfill cap is not compromised because of the proposed development.

### **Construction Phase – Construction Environmental Management Plan (CEMP)**

Construction activities can give rise to a number of impacts such as pollution of controlled waters and inappropriate lighting; however, we are satisfied that a significant effect could be ruled out subject to any forthcoming application being supported by a robust CEMP. The CEMP should include, as a minimum:

- Construction methods: details of materials, how waste generated will be managed.
- General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats protection, avoidance and mitigation measures, lighting scheme/management.
- Soil Management: details of topsoil strip, storage and amelioration for re-use.
- CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.
- Control of Nuisances: details of restrictions to be applied during construction including timing, duration and frequency of works; details of measures to minimise noise and vibration from piling activities, for example acoustic barriers; details of dust control measures; measures to control light spill and the conservation of dark skies.
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use.
- Traffic Management: details of site deliveries, plant on site, wheel wash facilities.
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details.

### **Flood Risk**

The Screening Report correctly identifies that the only part of the proposed development site at risk of flooding is a small area in the south and south-west of the site. These areas fall within Flood Map for Planning (FMfP) Flood Zone 2 and 3 (Rivers). Due to the scale and nature of the small section of the proposed development that falls within the identified flood outline, and based on the information provided, we can rule out a significant effect regarding flood risk. However, we support that a Flood Consequence Assessment will be submitted in support of any forthcoming planning application.

Please note that the Screening Report also identifies that there are areas within the site at risk of surface water flooding. We advise that you consult with the Lead Local Flood Authority on this matter.

## **Landscape**

We are satisfied that due to the distance, topography and intervening landscape features and vegetation, the proposed development is not likely to have any impacts on the landscape and sensory qualities of Pembrokeshire Coast National Park and can be screened out for landscape effects on designated landscape.

## **Other Matters**

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

## **Bonnie Palmer**

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning  
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: [swplanning@cyfoethnaturiolcymru.gov.uk](mailto:swplanning@cyfoethnaturiolcymru.gov.uk)

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

Planning and Environment Decisions Wales  Sent by email	Eich cyfeirnod Your reference	CAS-04538-H9C9V8
	Ein cyfeirnod Our reference	
	Dyddiad Date	4 September 2025
	Llinell uniongyrchol Direct line	██████████
	Ebost Email:	Cadwplanning@gov.wales

Dear Sir / Madam,

### **EIA Screening - Great Harmeston Solar Farm REF: CAS-04538-H9C9V8**

Thank you for your letter of 28 August 2025 asking for Cadw's view on the likely impact of the proposed development described above on the environment and whether or not Environmental Impact Assessment (EIA) is required.

Cadw, as the Welsh Government's historic environment service, has assessed the characteristics of this proposed development and its location within the historic environment. In particular, the likely impact on designated or registered historic assets of national importance. In assessing if the likely impact of the development is significant Cadw has considered the extent to which the proposals affect those nationally important historic assets that form the historic environment, including scheduled ancient monuments, listed buildings, registered historic parks, gardens and landscapes.

These views are provided without prejudice to the Welsh Government's consideration of the matter, should it come before it formally for determination.

This response is based on the advice provided by Cadw's Senior Historic Environment Planning Officer.

#### Advice

PE070 Pill Priory  
PE186 Priory Rath  
PE187 Thornton Rath  
PE188 Roman Castle  
PE215 Denant Rath  
PE223 Rosemarket Rath  
PE224 Rosemarket Dovecot

PE339 Fort Scoveston  
 PE473 Burnt Mound 240m NE of Highway Park  
 PE476 Burnt Mound 170m S of Jubilee Cottages  
 PE526 Round Barrow 300m NW of Tallyho  
 PE541 Castle Pill  
 PE572 Jordanston Farm Promontory Fort

Registered Parks and Gardens:

PGW(Dy)16(PEM) Castle Hall  
 PGW(Dy)19(PEM) Great Harmeston

Registered Historic Landscape:

HLW (D) 3 Milford Haven Waterway

Listed Buildings:

11983	Rosemarket dovecote	II*
11991	Clareston	II*
11992	Stable block at Clareston	II
11996	Church of St Peter	II*
12824	Limekiln near Castle Pill	II
12901	Priory Lodge	II
	Main Gateway & Flanking Walls and Terrace at Castle Hall	
12910	House	II
	Arched entry Flanking Driveway at E.Side of Castle Hall	
12911	House	II
12915	Black Bridge	II
12916	Castle Hall Lodge	II
12917	Barn at Castle Hall Farm	II
12927	Pillpriory Ruins	II*
	The Steps (including property formerly known as Brook	
12928	Villa)	II*
	The Priory Inn (including 3 properties formerly known Priory	
12929	Farmhouse, The Steps above Priory Farmh	II*
	St Botolph's Mansion (previously included with list for	
12930	Havarford Road)	II
12931	Stable Court at St Botolph's	II
	Range of outbuildings on W.Side of Farmyard at Castle Pill	
12933	Farm	II
12934	Church of St Peter & St Cewydd	II*
12935	The Vicarage	II
13052	Great Harmeston	II
	Long agricultural range to W of Great Harmeston House,	
13053	including cartsheds and food processing store	II
21507	Church of St Ismael	II
82522	Cartshed at Great Westfield	II
82523	Great Westfield	II
82524	Haystone Bridge (partly in Llanstadwell community)	II
82525	Entrance gatepiers, gates and railings at Clareston	II
82640	Limekiln at Kiln Farm	II

82641	Pope Hill House	II
82642	Outbuilding at Pope Hill	II
82674	Milepost at Trooper's Inn	II
82682	Romans Castle	II
82696	Milepost near Redstock Bridge	II
82697	Sunnybank, including attached outbuildings.	II
82698	Upper Harmeston	II
83214	Scoveston Fort	II
83215	Hayston Hall	II
83216	Courtyard of outbuildings at Hayston Hall	II
83217	Lofted outbuilding at Hayston Hall	II
83218	Hayston Bridge (partly in Rosemarket community)	II

This advice is given in response to a request for a screening opinion as to the need or not for an Environmental Impact Assessment (EIA) to be prepared for the Great Harmeston Solar Farm.

The request for a screening opinion is accompanied by an Environmental Impact Assessment Screening Report, produced by Pegasus Group. This incorrectly states in the section describing the Application Site that: -

*The Application Site is not in or adjacent to an environmentally sensitive area, as defined by Regulation 2(1) of the EIA Regulations (i.e., sites designated as Sites of Special Scientific Interest (SSSI), National Parks, World Heritage Sites, Scheduled Monuments, Area of Outstanding Natural Beauty, and sites covered by international conservation designations).*

However, as noted elsewhere in the document, scheduled monument PE476 Burnt Mound 170m S of Jubilee Cottages is located immediately to the north of the boundary.

The above designated historic assets are located inside 3km of the proposed development and a Heritage Screening Note attached to the screening report (Appendix 8) has considered the impact of the proposed development on their settings. It has concluded that Scheduled Monument PE476 Burnt Mound 170m S of Jubilee Cottages and Listed Building 82698 Upper Harmeston may be particularly sensitive to development in the nearby parts of the site through resultant changes to their setting, but it is unlikely that the settings of other designated historic assets will be adversely affected. We agree with that conclusion and note that whilst the proposed development could have adverse impacts on two designated historic assets, mitigation measures can be introduced, if necessary, so that these impacts will not be significant. As such in our opinion that EIA is not required.

The applicant is proposing to produce a historic environment desk-based assessment, which will include full setting assessments for the two designated historic assets identified as being potentially adversely affected by the proposed development, which will be submitted with any planning application for this solar farm. It is also proposed to carry out a geophysical survey to detect buried archaeological sites. These proposals are welcomed, but it should be noted that if unknown archaeological sites are identified, it may be necessary for additional archaeological evaluation, including trial

trenches to be carried out to clarify their extent nature and significance, in accordance with section 6.1.26 of Planning Policy Wales. This work will need to be completed before the determination of any application for the solar farm.

Yours sincerely

Nichola Smith  
Historic Environment Inspectorate / Arolygiaeth yr Amgylchedd Hanesyddol



Ref: DNS CAS-04538-H9C9V8

Tali Perry  
Planning Officer  
Planning and Environment Decisions Wales  
Crown Buildings  
Cathays Park  
Cardiff  
CF10 3NQ

By Email: [PEDW.Infrastructure@gov.wales](mailto:PEDW.Infrastructure@gov.wales)

2<sup>nd</sup> of September 2025.

Dear Tali Perry,

**Re: Scoping Direction Consultation Response – DNS CAS-04538-H9C9V8 – Proposed Great Harmeston Solar Farm, Pembrokeshire.**

In reference to the recent e-mail from PEDW consulting the Department on the above Screening Consultation, the Department offers the following response for your consideration.

The Department considers there is likely to be significant environmental effects from the proposal, and that an Environmental Statement should be produced to assess the impacts. From the Departments' perspective, the key issues likely to be significantly affected by the development are:

- Best and Most Versatile (BMV) agricultural land.
- Maintaining soil services and functions.

**1. Agricultural Land Classification (ALC) and BMV Agricultural Land:**

The Department can confirm that we have validated the ALC surveys of the proposed application site and that the proposed site contains BMV agricultural land.

The Department disagrees with the applicant's statements regarding soil impacts and reversibility of the development. The Department is also concerned regarding cumulative impacts to BMV agricultural land.

The total area of BMV potentially impacted by the proposal could be significant. The effects of the project on BMV agricultural land and must therefore be considered as part of the EIA and included in the Environmental Statement.

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

## **2. Soils:**

Mineral, organo-mineral and peat soils are finite and provide crucial ecosystem services and functions to Wales such as food production, water regulation, carbon storage, and biological functioning. The proposal is likely to have significant impacts upon these important services and functions and therefore must be assessed. The Department disagrees with the applicant's statements regarding soil impacts and reversibility of the development.

The Department considers that impacts to soils, soil functions and services should be considered as part of the EIA and included in the Environmental Statement.

The advice expressed does not bind any other part of Welsh Government commenting on the proposal. I trust the above comments are clear and unambiguous.

Yours sincerely

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