

EIA Scoping Direction

DNS CAS-04538-H9C9V8

Great Harmeston Solar Farm

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This Scoping Direction is provided on the basis of the original information submitted to Planning and Environment Decisions Wales on 15/12/2025 and subsequent ecological surveys 27/02/2026, in addition to consultation responses received. The advice does not prejudice any recommendation made by an Inspector or any decision made by the Welsh Ministers in relation to the development, and does not preclude the Inspector from subsequently requiring further information to be submitted with the submitted DNS application under Regulation 24 of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) (“The 2017 Regulations”).

1. Introduction

Planning and Environment Decisions Wales (PEDW) received a request under Regulation 33 of the 2017 Regulations for a Scoping Direction in relation to a proposed development for 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, by Arise Renewable Energy UK Ltd.

The request was accompanied by a Scoping Report (SR) 2025-12-15 – Scoping Report, and associated secondary ecological surveys, that outlines the proposed scope of the Environmental Statement (ES) for the proposed development. These details can be found by using the PEDW casework portal at <https://planningcasework.service.gov.wales/> by searching for reference **DNS CAS-04538-H9CV8**.

Planning and Environment Decisions Wales (PEDW) is authorised to issue this Scoping Direction on behalf of the Welsh Ministers.

This Direction has been prepared in accordance with the requirements of the 2017 Regulations as well as current best practice towards preparation of an ES. In accordance with the 2017 Regulations PEDW has consulted on the SR and the responses received from the consultation bodies have been duly considered in adopting this Direction.

2. Site Description

The Site is located wholly within the administrative boundary of Pembrokeshire County Council, comprising 128 hectares across multiple parcels of land to the south of the residential settlement of Johnston. The parcels include mostly fields for arable uses with associated fencing and tracks, divided by areas of mature woodland, trees, and hedgerows.

The Site is dissected by two main roads: the A4076 running north to southwest, and the A477 roughly north to south. A Transport for Wales (TfW) railway line runs from the southwest to the northeast, bisecting the southern parcels of the site.

Further information is available in section 2.1 of the SR.

3. Proposed Development

The proposal as described in the SR is for installation of a solar photovoltaic electricity generating station through ground-mounted Photovoltaic panels with an installed generation capacity of circa 65 MW, and associated ancillary development including:

- Underground cable point of connection to existing overhead lines to the south;
- Relevant communications (potential communications mast up to 15m) and monitoring equipment in substation area;
- Siting of a substation to the southeast of the site boundary;
- Internal servicing tracks;
- Communications and site security equipment;
- Temporary construction areas and accesses for construction, maintenance, and decommissioning vehicles;
- Landscaping and biodiversity enhancement features.

Further information is available in section 2.2 of the SR.

The scope of the EIA should include all elements of the development as identified in the SR, both permanent and temporary, and this Scoping Direction is written on that basis.

In the ES, any maps, drawing and illustrations that are proposed to describe the project should be designed in such a way that they can be overlaid with drawings and illustrations produced for other sections.

In line with the requirements of Regulation 17 and Schedule 4 to the 2017 Regulations, any reasonable alternatives considered should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed the choices made.

4. Consultation

In line with Regulation 33(7) of the 2017 Regulations, formal consultation was undertaken with the following bodies:

- Pembrokeshire County Council (PCC)
- Natural Resources Wales (NRW)
- Cadw
- Agricultural Land Use & Soil Policy, Welsh Government (LQAS)
- Transport Directorate, Welsh Government
- Transport for Wales (TfW)
- Network Rail
- Dŵr Cymru/Welsh Water (DCWW)
- Health and Safety Executive
- Civil Aviation Authority (CAA)
- Mid And West Wales Fire and Rescue Service

Responses received are included in **Appendix 1**.

5. Environmental Impact Assessment Approach

The Applicants should satisfy themselves that the ES includes all the information outlined in Schedule 4 of the 2017 Regulations. In addition, the Applicant should ensure that the Non-Technical Summary includes a summary of all the information included in Schedule 4. Consider a structure that allows the author of the ES and the appointed Inspector and Decision Maker to readily satisfy themselves that the ES contains all the information specified Regulation 17 and Schedule 4 of the 2017 Regulations. Cross refer to the requirements in the relevant sections of the ES, and include a summary after the Contents page that lays out all the requirements from the Regulations and what sections of the ES they are fulfilled by.

As the assessments are made, consideration should be given to whether standalone topic chapters would be necessary for topics that are currently proposed to be considered as part of other chapters, particularly if it is apparent that there are significant effects and a large amount of information for a particular topic.

There may also be topic areas scoped out of the ES where the developer may wish to include application documents that sit outside of the ES and provide information that will support their consultation(s) and the decision-making process. The developer is encouraged to liaise with key consultees regarding non-ES application documents which are not a legislative requirement of the DNS regime. If agreement cannot be reached over non-ES application documentation, then the developer may wish to explore whether PEDW can help provide clarity via its statutory pre-application advice service.

The ES should focus on describing and quantifying significant environmental effects. Policy considerations / arguments relating to those impacts should be addressed in other documentation supporting the application (e.g. a Planning Statement), which cross references the ES where necessary. This does not imply that ES chapters should not be prepared in accordance with relevant advice in policy documents (e.g. Technical Advice Notes), rather that the ES should concentrate on identifying significant effects on the environment rather than dealing with policy arguments or exhaustively listing policies.

5.1 Baseline

Schedule 4 of the 2017 Regulations states that the 'baseline scenario' is "A description of the relevant aspects of the **current** state of the environment" (emphasis added). The baseline of the ES should reflect actual current conditions at that time.

5.2 Reasonable Alternatives

In line with the requirements of Regulation 17 and Schedule 4 to the 2017 Regulations, any reasonable alternatives studied by the Applicant should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed the choices made.

It is worth bearing in mind that under the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations") unless it can be clearly shown to the Welsh Ministers that the project would have no adverse effect on the integrity of any designated sites, it would have to be shown that there is no feasible alternative solution. Further advice regarding the Habitats Regulations is provided in the final chapter of this Scoping Direction.

5.3 Currency of Environmental Information

For all environmental aspects, the applicant should ensure that any survey data is as up to date as possible and clearly set out in the ES the timing and nature of the data on which the assessment has been based. Any study area applied to the assessments should be clearly defined. The impacts of construction, operation and decommissioning activities should be considered as part of the assessment where these could give rise to significant environmental effects. Consideration should be given to relevant legislation, planning policies, and applicable best practice guidance documents throughout the ES.

The ES should include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters. Where professional judgement has been applied this should be clearly stated.

The ES topic chapters should report on any data limitations, key assumptions and difficulties encountered in establishing the baseline environment and undertaking the assessment of environmental effects.

5.4 Cumulative Effects

In accordance with Schedule 4, Paragraph 5(e) of the 2017 Regulations, the ES should include a description of the likely significant effects of the development on the environment resulting from “the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance to be likely affected or the use of natural resources”.

The Planning Inspectorate’s guidance for Nationally Significant Infrastructure Projects – Advice on Cumulative Effects Assessment sets out a staged process for assessing cumulative impacts which the Applicant should follow when preparing the list of projects for inclusion in the ES: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment>

The Applicant should ensure that relevant schemes identified are addressed in the ES using the tiered approach set out in the Advice.

There may be other types of development that could have cumulative impacts with the proposal, and it should not be assumed that the consideration of cumulative impacts can be restricted to other renewable energy proposals.

Effects deemed individually not significant from the assessment, could cumulatively be significant, so inclusion criteria based on the most likely significant effects from this type of development may prove helpful when identifying what other developments should be accounted for. The criteria may vary from topic to topic.

Best practice is to include proportionate information relating to projects that are not yet consented, dependent on the level of certainty of them coming forward.

All of the other developments considered should be documented and the reasons for inclusion or exclusion should be clearly stated. Professional judgement should be used to avoid excluding other development that is close to threshold limits but has characteristics likely to give rise to a significant effect; or could give rise to a cumulative effect by virtue of its proximity to the

proposed development. Similarly, professional judgement should be applied to other development that exceeds thresholds but may not give rise to discernible effects. The process of refinement should be undertaken in consultation with the Local Planning Authority, NRW, Cadw, and other consultees, where appropriate.

The scope of the cumulative assessment should be fully explained and justified in the ES.

5.5 Mitigation

Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured (through legal requirements or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

5.6 Population and Human Health

The Applicant should ensure that the ES addresses any significant effects on population and human health, in light of the EIA Regulations 2017. This could be addressed under the separate topic chapters or within its own specific chapter.

5.7 Transboundary Effects

Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The ES should address this matter as appropriate.

5.8 Topics Scoped In but not subject to a standalone chapter

For such topics, it may be helpful to users of the ES if it includes a summary table that signposts the chapters where these matters are addressed.

6. Environmental Impact Assessment Aspects

This section contains PEDW's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. Environmental topics or features are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by PEDW. In accordance with Regulation 17(4)(c) the ES should be based on this Scoping Direction in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report.

PEDW has set out in this Direction where it has/ has not agreed to scope out matters on the basis of the information available at this time. PEDW is content that the receipt of a Scoping Direction should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

6.1 Aspects Scoped In

Subject to the comments provided at Table 1, the following aspects are scoped into the ES:

- Human Health (not necessarily as a standalone chapter)**
- Ground Conditions**
- Hydrology (including Flood Risk - could be in the form of a separate Flood Consequence Assessment)**
- Soils and Agricultural Land**
- Climate (not necessarily as a standalone chapter)**
- Waste (not necessarily as a standalone chapter)**
- Material Assets (not necessary as a standalone chapter)**
- Population**
- Ecology and Biodiversity (including air quality in a proportionate manner)**
- Landscape**
- Cultural Heritage**
- Noise and Vibration (not necessary as a standalone chapter)**
- Glint and Glare**
- Decommissioning (not necessary as a standalone chapter)**

7. Table 1: Planning and Environment Decisions Wales Comments

| ID | Reference in Scoping Report | Issue | Comment |
|----------------|-----------------------------|---|---|
| General | | | |
| ID.1 | | General comment on information provided within the SR | <p>PEDW notice that some of the statements included in the SR were lacking evidence. Therefore, it is not possible to refine the scope of the ES further. At this stage, it is not possible to scope out some the aspects suggested in the ES because not enough information has been provided to confirm that further assessment would conclude they are not significant.</p> <p>Whilst a proportionate approach should be used in compiling the ES, should the Applicant wish to refine the scope of the ES at a later stage, a second EIA Scoping Direction can be requested at a later stage.</p> |
| ID.2 | 2.2.3 | Communication mast | The potential for a communication mast needs to be considered in the ES. Should the mast be required, its impact should be fully assessed within the relevant aspects, in particular landscape and visual. |
| ID.3 | | Description of development | The applicant's attention is drawn to NRW's comments in appendix 1 regarding their expectation of the description of development within the ES, covering construction, operation, and decommissioning, supported by a suite of scaled plans/drawings. |
| ID.4 | 2.2.4 | Construction of the underground connection | The details of the construction of the underground cabling under the railway need to be addressed in full in the ES. Potential effects must be assessed within the relevant chapters. |
| ID.5 | | Cumulative assessment | While developments that have already been built and are operational will form part of the baseline, this does not mean that they should be excluded when considering cumulative effects. Paragraph 5 of Schedule 4 of the 2017 Regulations makes it clear that consideration of cumulative effects should include existing development. |

| ID | Reference in Scoping Report | Issue | Comment |
|---|-----------------------------|---------------------|---|
| | | | <p>As highlighted in Section 5.4 of this Direction, the applicant should follow the advice provided in the Planning Inspectorate’s ‘Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment’. To ensure a comprehensive assessment in the final ES, the Applicant is advised to liaise with PCC on development proposals that should be included in the cumulative assessment, as they will be aware of developments in their area which will need to be considered, which may extend beyond other renewable energy developments.</p> <p>PEDW currently has knowledge of the following consented/planned DNS/SIP developments within approximately 10km:</p> <ul style="list-style-type: none"> • DNS CAS-03107-C5X9W1 - White House Farm Solar & Battery • DNS CAS-01859-K1M7Y6 - Dragon Energy Park • Valero Oil Refinery (PINS reference 3163511) • DNS CAS-03072-D7X6N7 - Alleston Solar Farm • Egnedol Biomass (PINS reference 3146073) |
| Applicant’s proposed Aspects proposed to be scoped out | | | |
| ID.6 | 5.1.1 – 5.1.5 | Human Health | <p>The SR acknowledges there is potential for impacts relating to nuisance from pollution, noise, lighting, and surface water runoff during construction. Construction activities will be controlled through standard Construction Environmental Management Plan (CEMP) condition. Whilst it is accepted that the development would be constructed in accordance with best practises and can be included in an outline CEMP, effects on human health still need to be addressed in relevant chapters of the ES. Therefore, Human Health is scoped into the ES, but not necessarily as a standalone chapter.</p> |

| ID | Reference in Scoping Report | Issue | Comment |
|------|------------------------------------|------------------------------------|---|
| | | | <p>The applicant is recommended to engage with PCC regarding impact upon some properties to the northeast of the site and the measures necessary to mitigate impacts during construction and decommissioning which should be recorded in the outline CEMP accompanying the ES.</p> |
| ID.7 | 5.2.1 – 5.2.4 | Ground Conditions and Land | <p>PEDW notes NRW's comments regarding groundwater and land contamination. It is known that there are two historic landfills within the boundary of the scheme. The phase 1 geo-environmental survey and ground conditions report have not been included in the submission to support the SR. There is potential for ground contamination during the construction works which should be addressed in the ES. Whilst NRW comment regarding the risk of contamination that can be dealt with by planning condition, this is not the how the EIA assessment should be conducted. The ES should assess the significance of the potential impact, the pathway of potential contamination during construction, and provide a set of mitigation measures to reduce this risk. Future planning conditions are not mitigation measures. As such, the assessment of ground conditions is scoped in.</p> <p>Additionally, it is recommended that the applicant liaise with NRW on the findings of the phase 2 geo environmental intrusive investigations when they are available.</p> |
| ID.8 | 5.3.1 – 5.3.7, and 5.4.14 – 5.4.16 | Soils and Agricultural Land | <p>It is noted that Best Most Versatile (BMV) Agricultural Land has been avoided at an early stage, however LQAS (Appendix 1) are not clear on the information supplied what areas of BMV would be included in the red line boundary.</p> <p>With regard to soil functions, LQAS observe the need for a methodology for the installation and decommissioning and how likely impacts upon soils have been avoided. They welcome the inclusion of a Soil Management scheme, and this must be informed by the baseline ALC report and soil resources / physical characteristics and be considered as part of the ES process.</p> |

| ID | Reference in Scoping Report | Issue | Comment |
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| | | | <p>It is noted that the SR does not address whether the site contain any peat and therefore it is not clear whether impact on the soils ecosystem service. With the limited information provided, it is not possible to scope this aspect out at this stage.</p> <p>With this in mind, it is considered that BMV, impact on soils during construction and decommissioning, and soil functions and services is scoped into the ES. Future assessment should be cross referenced with the ecological assessment where appropriate.</p> <p>The applicant’s attention is drawn to comments from LQAS outlining the policies and guidance considered applicable to the development.</p> |
| ID.9 | 5.4.1 – 5.4.32 | Water (hydrology and flood risk) | <p>The SR indicates that a Flood Consequences Assessment (FCA), operational surface water drainage strategy, a CEMP and Decommissioning Environmental Management Plan (DEMP) will be submitted as part of the application.</p> <p>The site is linked to the Cleddau River through a series of unnamed waterbodies. Having regard to the potential uses of directional drilling in the construction of the underground cable to connect the site to the grid, it is not possible at this stage to scope out any risk of contamination. The ES should address any potential pathway between any construction activities and the Cleddau River and suitable mitigation measures should be provided.</p> <p>Additionally, any hydrological link to Pembrokeshire Marine SAC and Milford Haven SSSI should also be addressed, with cross reference to the ecological assessment.</p> <p>Therefore, hydrology and flood risk are scoped in.</p> |

| ID | Reference in Scoping Report | Issue | Comment |
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| | | | <p>In relation to drainage matters, the applicant's attention is also drawn to Network Rail's comments regarding required distances of drainage methods from their assets. The applicant is advised to ensure these distances and requirements of Network Rail are adhered to when making a SuDS application for the scheme.</p> <p>The SR identifies only part of the proposed development site at risk of flooding, a small area in the south and south-west of the site within zones 2 and 3 for Rivers. PEDW agrees that the risk of flooding should be addressed in the accompanied FCA and cross referenced in the hydrology assessment.</p> <p>Applicant's attention is drawn to the changes to TAN 15 that came into force on April 2025. The application should be accompanied by a Drainage Statement prepared in accordance with the TAN.</p> |
| ID.10 | 5.6.1 – 5.6.4 | Air quality | <p>Whilst there are no Air Quality Management Areas (AQMA) within 2 km of the site, vehicular movement for the construction of the proposal has the potential to pass through AQMAs.</p> <p>Consequently, an impact assessment on the AQMAs may be required, and this should be proportionately addressed in the ES and could be addressed in the outline CEMP.</p> <p>Additionally, should construction traffic have an impact on designated nature conservation sites susceptible to pollution deposition, this should be addressed as appropriate in the ecological assessment.</p> <p>Based on the above, air quality does not require a standalone chapter, but should be scoped into the ES in relevant chapters and supporting documents.</p> |
| ID.11 | 5.8.1 – 5.8.2 | Climate | <p>PEDW agrees that Climate does not require a standalone chapter, as related impacts will be considered in other chapters (and supporting assessments for</p> |

| ID | Reference in Scoping Report | Issue | Comment |
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| | | | topics scoped out). Climate Change is however scoped into the ES, but not as a standalone chapter. |
| ID.12 | | Noise and Vibration | <p>The SR states that a Noise and Vibration assessment will be included in the submission. It is unclear why this should not be part of the ES. It is also recommended that mitigation measures are included in the outline CEMP.</p> <p>Therefore, also in light of PCC comments, it is advised that the Noise and Vibration assessment is included in the ES in a proportionate manner, either as a technical aspect or an appendix.</p> |
| ID.13 | 5.9.1 – 5.9.3 | Risk of Major Accident and Disaster | PEDW agrees with the content of the SR on this matter, and this can be scoped out of further assessment. |
| ID.14 | 5.10.1 – 5.10.2 | Material Assets | Due to the number of assets crossing the site such as the railway and Dwr Cymru pipelines (see Appendix 1) this aspect cannot be scoped out of the assessment. The protection of assets during construction, operation and decommissioning of the project should be addressed in the ES in a proportionate manner, not necessarily in a standalone chapter. . |
| ID.15 | 5.5.1-19 | Traffic and Transport | <p>The SR indicates an increase in traffic flows during the construction period, less than 10% increase in vehicle flow or HGV flows. A Construction Traffic Management Plan (CTMP) is to be included with the submission which outlines (amongst other things) the site access arrangements during the construction and operational phases, swept path analyses, construction traffic routing along the A477 and A4076, forecasts of vehicle movements, and traffic management & mitigation measures. It is recommended that cable routing delivery and installation is also included with the CTMP.</p> <p>PEDW welcomes the inclusion of the outline CTMP, and this should be included as a technical appendix to the ES. PCC in their response highlights the level of detail they would expect to be included in the submission, and it is recommended to engage with the Authority highways officers regarding the content of the outline CTMP when greater certainty is available.</p> |

| ID | Reference in Scoping Report | Issue | Comment |
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| | | | <p>The applicant's attention is drawn also to the Welsh Government Transport Directorate's comments on this subject as the highway authority for the A4076 trunk road, detailing what level of information they expect as part of any application submission, and to be included within any outline CTMP. You are also advised of the draft guidance document in Appendix 1: <i>'Pulling Together' - Best Practice for Transporting Abnormal Loads in Wales</i>. PEDW recommends the applicant liaises directly with Welsh Government Transport Directorate on the draft abnormal load notifications.</p> |
| ID.16 | 5.11.1 – 5.11.2 | Waste | <p>PEDW disagrees with the SR where it states there would be very little waste, particularly during decommissioning. Given that decommissioning will be addressed in the ES (as in section 33 of this table) waste should be included in a proportionate manner where applicable. Waste is therefore scoped into the ES, although not necessarily as a standalone chapter.</p> |
| Landscape | | | |
| ID.17 | | General | <p>PEDW welcomes that the landscape and visual chapter will be prepared in line with Guidelines for Landscape and Visual Impact Assessment (3rd Edition, 2013) (GLVIA 3). The applicant is also encouraged to consider the published Notes and Clarifications on the GLVIA3.</p> <p>The site is not located within any national statutory protected landscape designations, and NRW are satisfied that due to considerable distance and intervening vegetation/topography, impacts on the Pembrokeshire Coast National Park and can be screened out for landscape effects in the ES.</p> <p>PEDW advises the applicant to engage with the Planning Authority on viewpoints, and cumulative effects on developments within the authority's local knowledge. The ES should also consider the cumulative visual impacts on those identified in ID 5 of this table.</p> |

| ID | Reference in Scoping Report | Issue | Comment |
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| | | | PEDW agree with the SR insofar as the ES should include residential visibility proportionally within the chapter. |
| Cultural Heritage | | | |
| ID.18 | | General | Cadw agrees that as the boundary of the registered Milford Haven Waterway Landscape of Outstanding Historic Interest lies beyond the site, an ASIDOHL is not necessary for the scope of this project. PEDW does although agree that this asset should be included for assessment in regard to the settings of heritage assets. |
| ID.19 | | Study Area | Cadw have disagreed with the 1km study area. In line with <i>The Setting of Historic Assets in Wales</i> , the study area should be 3km. The applicant's attention is drawn to their response where they have given a list of the assets within a 3km bare earth ZTV. They also stress that Great Harmeston historic park and garden lies within the SR's 1km study area which was omitted, and should be assessed for impact. |
| ID.20 | | Approach to surveys | Cadw have advised that all historic assets identified during the walkover survey to be recorded by photography and written recording (including preliminary assessment of function, date, and significance). They also advise that archaeological evaluation may be necessary for those where insufficient information is available to undertake the written recording accurately. Results of surveys will need to form part of the ES. |
| Biodiversity | | | |
| ID.21 | | General | The ES should include sufficient information to enable the extent of any environmental impacts arising from the proposed development to be determined, in particular any legally protected species and designated sites. The ES should include a description of all existing natural resources and biodiversity interests in and near to the application site areas and cable routes, with a detailed assessment of any likely impacts of the development. |

| ID | Reference in Scoping Report | Issue | Comment |
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| | | | <p>The ES should also describe how avoidance measures have been implemented through the site selection and design process and demonstrate compliance with the stepwise approach advocated in PPW, as well as biodiversity enhancement.</p> |
| ID.22 | | Section 7 list of species and habitats | <p>Please refer to section 8.1 more information on the changes to the Section 7 list of species and habitats under the Environment (Wales) Act 2016. The Applicant should liaise directly with relevant Planning Authorities and NRW to ensure that the ES accounts for the updated Section 7 list, and that significant effects on all necessary habitats and species are reported in the ES.</p> |
| ID.23 | | Key habitats and surveys | <p>All habitat surveys should be undertaken in line with the Handbook for Phase 1 habitat survey – a technique for environmental audit (2010) JNCC Resource Hub. NRW advises that Phase 1 surveys be done during the summer when there is greatest chance of identifying species that are present on the site.</p> <p>It is noted that, despite the SR stating that several surveys have been conducted in 2024, limited information on methodology are provided in the report. It is noted that the Applicant has submitted additional reports after requesting an EIA Scoping Direction which were not part of the original Scoping Request:</p> <ul style="list-style-type: none"> • Badger Report (dated January 2026) • Breeding Bird survey (dated January 2026) • Great Crested Newts eDNA Survey (dated January 2026) <p>However, the following information/reports were not submitted despite the SR stating that they have been conducted:</p> <ul style="list-style-type: none"> • The Winter Bird Surveys • The Bat activity Survey |

| ID | Reference in Scoping Report | Issue | Comment |
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| | | | <ul style="list-style-type: none"> <li data-bbox="987 288 2011 363">• The Information requested from West Wales Biodiversity Information Centre (LERC) (Data received on 4th November 2024) <p data-bbox="943 400 2069 507">Therefore, it is not possible for PEDW or the statutory consultees to answer the questions regarding the robustness of the survey efforts to date, nor the level of mitigation proposed.</p> <p data-bbox="943 549 2069 799">It is not known, based on the limited information provided by the Applicant, whether the correct target species have been identified. It is therefore only possible to comment on the species identified in the SR. However, the Applicant should consider whether the scope of the ecological survey should be revisited based on the changes of the Section 7 of the Environment (Wales) Act 2016 and the fact that only limited information has been provided at the time of the request.</p> <p data-bbox="943 807 2056 1023">Generally, ecological survey should consider the red line boundary, and where functionally linked, adjacent land. Targeted surveys for species scoped in should be undertaken by qualified and licensed ecologists where applicable, and accord with best practice guidelines. If any surveys deviate from published/best practice guidance, justification should be given in the ES as to why this is the case.</p> <p data-bbox="943 1066 2040 1166">However, the Applicant is recommended to liaise with PCC and NRW about a more focused survey effort for this site, and to consider the age of the survey undertaken to date.</p> |
| ID.24 | | Survey effort to date | <p data-bbox="943 1179 2011 1321">It is noted that all surveys results provided are dated 2024. It is therefore brought to the Applicant’s attention that, by the time an Environmental Statement is compiled and submitted, some surveys may be older than two years.</p> |

| ID | Reference in Scoping Report | Issue | Comment |
|-------|-----------------------------|---------------------|--|
| | | | <p>Whilst professional judgment can be used, in order to assess the correct significance of the potential impact, an accurate baseline description is required. Most up to date survey results would normally be necessary to understand the level of potential impact and to provide effective mitigation measures.</p> <p>Therefore, it is recommended for the Applicant to consider whether updated surveys for 2026 should be required. If it is not considered necessary to provide 2026 survey, the rationale should be clearly addressed in the ES and will be tested at examination.</p> |
| ID.25 | 6.3.19 | Designated Sites | <p>The SR proposes to scope out several designated sites from the assessment.</p> <p>However, PEDW disagree that Pembrokeshire Bat Site SAC can be scoped out of the assessment at this stage due to lack of information regarding any Horseshoe bat activities linked to the SAC.</p> <p>Additionally, the SR does not clarify whether West Wales Marine SAC is hydrologically linked to the site. The potential use of directional drilling for the undergrounding cable crossing of the railway may pose risk of contamination. Without additional information on the method of construction and whether the site is linked to West Wales Marine SAC, it is not possible at this stage to scope this designated site out of the assessment.</p> |
| ID.26 | 6.3.48 and 6.3.71 | Great Crested Newts | <p>PEDW has reviewed the separate Great Crested Newts eDNA Survey and agrees with NRW (Appendix 1). However, PEDW also note that the survey was conducted in 2024. It is therefore recommended that either new surveys are conducted, or a robust explanation as to why this is not necessary should be provided in the ES and tested at examination.</p> |
| ID.27 | 6.3.49-54, and 6.3.73–75 | Ornithology | <p>The applicant's attention is drawn to NRW's two responses, and PCC's response, in relation to ornithology.</p> |

| ID | Reference in Scoping Report | Issue | Comment |
|-------|-----------------------------|-------|---|
| | | | <p>NRW highlights that the SR does not detail breeding or wintering bird methodologies, but agree that both should be scoped in for further assessment. PCC require a breeding bird mitigation strategy (with specific reference to Skylarks given optimal Skylark habitat as noted in the SR) to accompany the ES. Other species-specific surveys may be required based upon the findings of habitat surveys. As NRW highlight, they are unable to advise on this matter any further based on the information provided to date. As explained, PEDW recommends liaising with PCC and NRW directly to ensure it is clear whether additional species should be included in the assessment. Any omission should be accompanied by a robust justification in the ES.</p> |
| ID.28 | 6.3.56 and 6.3.76 | Bats | <p>The ES should be supported by up-to-date bat surveys at the time of application submission. The SR does not include the results of the survey conducted to date and a separate report was not provided. Based on the information provided, PEDW agrees with NRW that the results of the surveys should inform consideration of impacts upon greater horseshoe bats associated with the Scoveston Fort Site of Special Scientific Interest (SSSI).</p> <p>NRW advise that the combination of desk-based study and activity surveys should be used to identify any significant effects on horseshoe bats as a feature of the Pembrokeshire Bat Sites Special Area of Conservation (SAC).</p> <p>Both designated sites are therefore scoped in the assessment.</p> <p>Trees on site should also be subject to ground level surveys for their potential for bats, and those that do have potential to support maternity-roosts, should be subject to further assessment; results of which included in the submission.</p> <p>PCC note they have not viewed any bat survey results to date, and it is recommended the applicant engage with the local authority directly to inform the future scope of the ES in this regard.</p> |

| ID | Reference in Scoping Report | Issue | Comment |
|-------|-----------------------------|----------------------|--|
| ID.29 | 6.3.55 and 6.3.77 | Badgers | <p>The survey results from Tyler Grange concludes an active sett to the south, a Latrine to the north, and 3 snuffle holes dotted across the site. It is noted that NRW in their second consultation response have not reviewed this, and similarly PCC reference that the survey was undertaken in 2024. It is recommended to conduct updated surveys and the results should be included for assessment. Clear and suitably robust mitigation measures should be provided.</p> |
| ID.30 | 6.3.78 | Dormice | <p>NRW note the lack of record of dormice in the area and the development is not likely to have significant impact. PCC find that, should no hedgerows be removed and ample buffer distances be maintained, no dormice surveys would be necessary. The details of any protection measure and buffers should be clearly identified in the ES.</p> <p>The SR refers to small sections of hedgerow or riparian vegetation removal possibly being required for essential works only. PEDW and PCC agree that robust rationale for not undertaking surveys for dormice in this circumstance should be clearly explained and justified in the ES.</p> |
| ID.31 | 6.3.79 | Otter and Water Vole | <p>PEDW and NRW welcome that impact upon Otters and Water Voles have been included for assessment, including as a feature of the Pembrokeshire Marine SAC.</p> <p>The applicant's attention is drawn to NRW's comments concerning surveying of terrestrial and riparian habitat for their potential for otters, and further assessment depending upon the results. They also advise that the ES is required to identify and evaluate potential impact pathways on otter, both as a European Protected Species <i>and</i> as a feature of the SAC.</p> <p>With regard to Water Vole, the SR notes potential suitability of watercourses for the species, and so NRW require the methodologies, locations and scale of surveys associated to be presented in the ES. Cable works could impact on</p> |

| ID | Reference in Scoping Report | Issue | Comment |
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| | | | riparian habitat for Water Vole, and it is agreed that this should be assessed in the ES and suitable mitigation measures proposed. |
| ID.32 | 6.3.61 and 6.3.80-81 | Reptiles | PCC note that should suitable habitat be lost within the site (boundary features such as hedgerows as detailed in ID 30 of this table), a precautionary approach be applied to site clearance. PEDW recommends the applicant engage with PCC on this matter should the design of the scheme evolve as to require removal of this habitat, or be likely necessary for essential works. |
| ID.33 | 6.3.47, 6.3.57, and 6.3.76, | Lighting | New and retained Green Infrastructure (GI) should be kept free from any artificial lighting during construction and operation. PEDW and NRW agree that any lighting necessary for the delivery of the scheme be included within the ES and the potential impacts be assessed. |
| ID.34 | | European Protected Species (EPS) licenses | The applicant's attention is drawn to NRW's response detailing the potential requirements for EPS licenses where necessary. |
| ID.35 | 6.3.83 | Biodiversity enhancement | <p>PEDW welcomes that biodiversity enhancement on the site will be delivered and managed by an outline Landscape and Ecological Management Plan (LEMP) to be provided as part of the ES. Enhancement measures should be site-specific and informed by the results of habitat surveys, and the Applicant's attention is drawn to the section of PCC's response concerning their native trees and shrubs list, and native wildflowers list.</p> <p>Where enhancement measures are proposed nearby to the railway line, PEDW recommends the applicant cross-reference PCC's native list with the list of permitted species from Network Rail.</p> |
| Glint and glare | | | |
| ID.36 | | General | PEDW welcomes that a Glint and Glare assessment will form part of the ES, and agrees with the scope of assessment in the SR. The assessment should include residential properties, highways, and railway lines. The applicant is advised to contact the local authority separately to identify and narrow down receptors for this part of the ES. |

| ID | Reference in Scoping Report | Issue | Comment |
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| | | | <p>Network Rail have indicated the need to ensure possibility of glint/glare from the arrays is eliminated where they may interfere with a driver's line of sight or interpretation of signalling equipment.</p> <p>Given the SR indicates the site is approximately 2km from the Rosemarket Airfield, the applicant may wish to engage with the CAA on the scope of glint and glare study separately.</p> |
| Population | | | |
| ID.37 | 6.4.1.1-18 | General | <p>It is recommended the applicant engage with PCC further on this matter to ensure the correct data is being used for the baseline conditions for any assessment.</p> <p>Unless the applicant expects high impacts upon socio-economic conditions as a result of the project, PEDW questions whether this particular element requires its own standalone chapter within the ES. It may be the case this can be scoped in for assessment proportionally, within relevant other chapters of the ES.</p> |
| Other considerations | | | |
| ID.38 | | Decommissioning | <p>The ES should be based on a worst-case scenario, where it may be fully decommissioned when its operational life ends. Decommissioning should be explored in a proportionate manner in the ES. At a minimum, the ES should clearly indicate how decommissioning of the site will take place, clearly indicate what will be left on site and what will be removed. The ES should address what the end-of-life cycle will be for the infrastructure on site. Therefore decommissioning is scoped into the ES in a proportionate manner for relevant chapters.</p> |
| ID.39 | | Non-technical summary | <p>The applicant's attention is drawn the IEMA guidance on Effective Non-Technical Summaries for Environmental Impact Assessment:</p> |

| ID | Reference in Scoping Report | Issue | Comment |
|-------|-----------------------------|----------|--|
| | | | <p>https://www.iema.net/media/vksermak/2023_iema_advicenoteguide_nts.pdf</p> <p>The guidance indicates that large linear projects may impact too many receptors to report in one document and it may be appropriate to split the NTS into smaller documents covering smaller spatial extents.</p> |
| ID.40 | | Solar PV | <p>The applicant's attention is drawn to the fact that some solar panels are coated in PFAS (Per- and polyfluroalkyl substances) which can leach over time due to wear and tear. Should the panels proposed include this, appropriate measures need to be put in place to ensure that leaching of PFAS into the local environment does not occur and this should be address in a proportionate manner in the ES.</p> |

8. Other Matters

This section does not constitute part of the Scoping Direction, but addresses other issues related to the proposal.

8.1 Revised Section 7 list of species and habitats

A Dear CPO letter was published on 1 April 2026 notifying of a revised Section 7 list of species and habitats under the Environment (Wales) Act 2016: [Revised Section 7 list of species and habitats under the Environment \(Wales\) Act 2026 | GOV.WALES](#)

The revised Section 7 list is available here: [Section 7 list: species and habitats of principal importance in Wales | GOV.WALES](#)

Background information is available here: [Section 7: habitats and species of principal importance for maintaining and enhancing biodiversity | GOV.WALES](#)

The new list includes different definitions of habitats, making comparisons difficult, but the number of protected species has increased (e.g. vascular plants +232, 300% increase; invertebrates +277, 147% increase; birds +88, 173% increase; fungi +79, 293% increase; marine species +16, 29% increase).

Applicants should liaise directly with relevant Planning Authorities and NRW to ensure that the ES accounts for the updated Section 7 list, and that significant effects on all necessary habitats and species are reported in the ES.

8.2 Updated Guidance from the Design Commission for Wales

On 23 November 2023 the Design Commission for Wales published their updated guidance “Designing for Renewable Energy in Wales”. The guidance is available online: <https://www.gov.wales/designing-renewable-energy-wales>

8.3 Habitats Regulation Assessment

The Conservation of Habitats and Species Regulations 2017 require competent authorities, before granting consent for a plan or project, to carry out an appropriate assessment (AA) in circumstances where the plan or project is likely to have a significant effect on a European site (either alone or in combination with other plans or projects). The competent authority in respect of a DNS application is the relevant Welsh Minister who makes the final decision. It is the Applicant’s responsibility to provide sufficient information to the competent authority to enable them to carry out an AA or determine whether an AA is required. The applicant should undertake a shadow HRA to screen potential impacts upon nationally and internationally designated sites:

- Pembrokeshire Marine SAC
- Scoveston Fort SSSI
- Milford Haven Waterway SSSI

When considering whether or not significant effects are likely, applicants should ensure that their rationale is consistent with the CJEU finding (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62017CN0323>) that mitigation measures (referred to in the judgment as measures which are intended to avoid or reduce effects) should be assessed within the framework of an AA and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site when determining whether an AA is required ('screening'). The screening stage must be undertaken on a precautionary basis without regard to any proposed integrated or additional avoidance or reduction measures. Where the likelihood of significant effects cannot be excluded, on the basis of objective information the competent authority must proceed to carry out an AA to establish whether the plan or project will affect the integrity of the European site, which can include at that stage consideration of the effectiveness of the proposed avoidance or reduction measures.

Where it is effective to cross refer to sections of the ES in the HRA, a clear and consistent approach should be adopted.

The Planning Inspectorate's guidance for Nationally Significant Infrastructure Projects – Advice on Habitats Regulations Assessments may prove useful when considering what information to provide to allow the Welsh Ministers to undertake AA: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-habitats-regulations-assessments>

8.4 SuDS Consent

Whilst a separate legislative requirement from planning permission, the Applicant's attention is drawn to the statutory SuDS regime that came into force in Wales in January 2019. The requirement to obtain SuDS consent prior to construction may require iterative design changes that influence the scheme that is to be assessed within the ES and taken through to application. As such, it is recommended that the applicant contact the local SuDS Approval Body early on.

In accordance with paragraph 7.6 of Technical advice note (TAN) 15: development, flooding and coastal erosion, applications submitted after 31 March 2025 where planning permission is being sought before SAB approval should be accompanied by a Drainage Statement. Figure 3 of TAN 15 sets out the required contents of a Drainage Statement.

Appendix 1: Consultation Responses

out by a qualified ecological surveyor, and the ES must identify the potential of the habitats on site to be used by protected species.

Any application/Environmental Statement (ES) must:

- Cover the construction, operation maintenance, closure and decommissioning stages of any project.
- Determine the importance of ecological features affected, through survey and/or research.
- Assess impacts potentially affecting important features.
- Characterise the impacts by describing their extent, magnitude, duration, reversibility, timing and frequency.
- Identify cumulative impacts; and identify significant effects of impacts in the absence of any mitigation.
- Consider alternative location(s) or layouts for the proposed development.
- Identify mitigation measures and explain their likely success.
- Identify opportunities for enhancement.
- Design and agree a monitoring strategy and monitoring of mitigation performance.
- Provide sufficient information for mitigation measures to be implemented effectively.
- Produce a clear summary of the residual impacts and the significance of their effects following incorporation of avoidance and mitigation measures, in accordance with planning policies and legislation.

In order to provide confidence in the information provided as part of the application/ES the following key points must be addressed:

- Ecological baseline and trends if the project were not to go ahead.
- Criteria used to evaluate ecological features.
- Criteria used to assess the significance of impacts of the project.
- Justification of methods used.
- The identification of likely impacts (positive and negative) on ecological features together with an explanation of the significance of their effects.
- Mitigation, compensation and enhancement measures.
- Legal and policy consequences.
- A note of any key data that were unavailable or missing and
- A presentation of any analytical techniques used and the analysis itself.
- Consideration for the zone of influence – if the site requires new infrastructure (roads, power supply etc.) there could be significant consequences for ecological features beyond the boundaries of the site.

Any ES must also be mindful of the following:

- Preliminary activities prior to the main construction contract
 - Ground investigations.
 - Vegetation clearance.
- Construction phase
 - Access and travel on/off-site, including temporary access routes for vehicles.
 - Areas for plant maintenance and for storage of oils, fuels and chemicals.
 - Movement of materials to/from or within the site.
 - Acoustic disturbance and vibration from construction activities.
 - Dust generation.
 - Soil stripping.
 - Environmental incidents and accidents e.g. spillages, noise and emissions.
 - Lighting
 - Vegetation/habitat clearance including tree felling.
- Occupation/operational and decommissioning phase

- Access to site (both route and means).
- Drainage.
- Implementation of habitat management.
- Lighting.

Species and Habitats to be considered:

A primary ecological assessment was submitted as part of the pre-application in support of the current consultation and scoping opinion. This may already include much of the following information.

- Any application/ES must identify any habitats and species that are likely to be affected by the proposal and identify potential options for mitigation and enhancement. There must also be justification for disregarding certain species from any assessments.
- Reptiles – We note that in section 7.20 of the pre-application report that a reptile survey has been screened out. Common species of reptiles may be present particularly within boundary features. If suitable habitat is to be removed as a result of the proposal, then survey may be required. A precautionary approach to any site clearance may also be necessary, particularly any removal of boundary features. It is likely that the development will result in opportunities for reptile enhancements, these should be clearly identified and described.
- Badgers – the Tyler Grange badger survey results report should be submitted as part of the EIA. [REDACTED]
[REDACTED] The survey was undertaken in 2024, therefore details of proposed updated surveys/walkovers prior to works commencing including recommendations should new badger setts be found will be included in the EIA. Badgers are protected under The Protection of Badgers Act 1992.
- Birds – the Tyler Grange breeding birds survey results report should be submitted as part of the EIA. [REDACTED]
[REDACTED]
[REDACTED]
- Great Crested Newts - the Tyler Grange GCN survey results report should be submitted as part of the EIA. All the onsite water bodies returned a negative result. No further action is required with regards to GCN.
- Dormice – We note that in section 7.20 of the pre-application report that a dormouse survey has been screened out the submitted report identifies that there are suitable hedgerows on site to support dormice, however, does not consider dormice further as there are no records within close proximity. Provided a 5m buffer for hedgerows is established and retained throughout and there are no hedgerows to be removed, dormouse surveys will not be necessary. However, should there be requirement for hedgerow/s to be removed, then further justification for not undertaking dormice surveys will be required within any submitted application/ES. Dormice are protected under European and UK legislation; their presence is a material consideration in the planning process.
- Bats – There are several important sites for bats within proximity to the proposed development. The Pre-App response indicates that bat surveys have been undertaken and concluded that low numbers of common bat species were using the site for foraging and commuting. The results of the bat surveys should be included in the EIA. As a planning authority we have not seen the bat survey results.
- Furthermore, any security lighting may impact upon bat movements in the area, therefore if significant lighting is proposed, important areas for bats identified through the bat surveys must remain dark and inform any lighting plan to ensure there is no

impact upon the bats and other nocturnal wildlife. Bats are protected under European and UK legislation; their presence is a material consideration in the planning process.

- Otter – We note that in section 7.20 of the pre-application report that an Otter survey has been screened out. [REDACTED]

While the development may not be directly impacting otter habitat, it would potentially impact the overland travel routes that otters use, as they are known to traverse agricultural fields to move between waterbodies. Additionally, no buffer zones have been implemented around any of the water features on or adjacent to the site.

- As there is suitable otter habitat present and the Otter (*Lutra Lutra*) is a feature of both the Pembrokeshire Marine SAC and the Cleddau Rivers SAC, we would request that an otter survey be undertaken including identifying possible overland travel routes between waterbodies through the site. In the absence of an otter survey, we would operate under a precautionary principle and require an Otter mitigation plan to be submitted.

The site is hydrologically connected to the Pembrokeshire Marine Special Area of Conservation (SAC) and the Milford Haven Waterway Site of Special Scientific Interest (SSSI). A Test of Likely Significant Effect (TLSE) will need to be undertaken to establish if there is any specific mitigation required to avoid a likely significant effect on the SAC. A Construction Environment Management Plan will be required to enable an Appropriate Assessment (AA) to be undertaken.

Biodiversity Enhancements:

Solar Parks offer numerous opportunities to provide enhancements for wildlife, particularly where they are developed on land which has previously held low ecological diversity, such as improved and arable land. Arable land taken out of agricultural use represents a decrease in nutrient run-off

To comply with PPW12 and the Environment (Wales) Act 2016, An ecological management plan should be submitted, to include details of how the site will be planted, enhanced and managed for wildlife throughout the solar farm's lifetime including confirmation that the site is not going to be used for sheep or animal grazing as is sometime implemented on solar farms. The plan should also include details of an ecological monitoring programme, to ensure the management plan is working and, where necessary, make changes to ensure appropriate and successful management for biodiversity. We would agree with some of the suggestions put forward in section 7.21 and would thoroughly encourage wildflower planting alongside hedgerow planting and management. We would insist that any planting will have species chosen from our native trees and shrubs list, and our native wildflowers list. Additionally, we would encourage the support of the boundary planting to strengthen the existing riparian corridors adjacent to the site along with the section of adjacent Wet Woodland.

Please also be mindful of the following points:

- The results of all required surveys and assessments of the effects the development may have on species and habitats and recommendations for mitigation and enhancement must be included within any application/ES.
- Ecological assessments may result in the requirement for further survey work.
- Surveys and assessments must be carried out in line with the British Standards for Biodiversity: Code of Practice for Planning and Development (BS42020:2013) and other relevant species and survey best practice guidelines. All surveys will be required to be carried out by a suitably qualified ecologist within the appropriate season and to appropriate survey standards and methodology.

Contamination

The Pollution Control Manager is satisfied with the information included in the Scoping Report.

Heritage

The EIA should include a Heritage Statement to consider the setting of listed buildings and the registered Historic Park and Garden.

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

Yours sincerely

A solid black rectangular box used to redact the signature of Stephen Williams.

Stephen Williams
Principal Planning Officer
Development Management

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

Dyddiad/Date: 17 February 2026

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 18 December 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 Scoping Report Great Harmeston Solar Farm, Pembrokeshire. On behalf of Arise Renewable Energy UK Ltd, by Pegasus Group, dated: 12/12/2025 | Pegasus Ref: P24-1037.

Our comments include those matters within NRW's remit that we consider will need to be taken into account and applied to the Environment Impact Assessment (EIA) and the resulting Environmental Statement (ES).

We advise that within the ES the proposed scheme should be described in detail in its entirety. This description should cover construction, operation and, where applicable, decommissioning phases as appropriate and include detailed, scaled maps and drawings.

We would expect the description to include:

- The purpose and physical characteristics of the proposal
- Location, development size and configuration of the development including flexibility of the site layout

- Procedures for good working practices
- Identification of appropriate pollution contingency and emergency measures for watercourses on site
- Timing of all works and contingency plans should slippage in the programme occur
- Maintenance requirements of structures
- Arrangements for maintenance and management of any habitats within the site
- Artificial lighting requirements, including likely intensity and location of light spill on new and retained green infrastructure, bat roosts and bat flight paths.

The submission should clearly show the location and extent of the red line planning boundary and the extent of land owned by or under legal agreement with the applicant for the purposes of the development and any associated works.

Any maps, drawings and illustrations that are produced to describe the project should also be designed in such a way that they can be overlaid with drawings and illustrations produced for other sections of the ES such as biodiversity

Protected Species

In general the EIA for this development should include sufficient information to determine the extent of any environmental impacts arising from the proposed scheme on legally protected species, including those which may also comprise notified features of designated sites affected by the proposals.

Description of Biodiversity

The EIA must include a description of all the existing natural resources and wildlife interests within and in the vicinity of the proposed development, together with a detailed assessment of the likely impacts and significance of those impacts.

Key Habitats

Any habitat surveys should accord with the Handbook for Phase 1 habitat survey – a technique for environmental audit (2010) | JNCC Resource Hub. We advise that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present.

The Phase 1 survey results should be presented alongside details of the current annual management and land use of the site, including changes which may influence use of the site by protected species.

Surveys

We advise that the site and where necessary land adjacent to the site is subject to assessment to determine the likelihood of protected species being present and affected by the proposals. Targeted species surveys should be undertaken for all species scoped in which:

- Are undertaken by qualified, experienced and where necessary, licensed ecologist(s) and,
- Comply with current best practice guidelines. In the event that the surveys deviate from published guidance, or there are good reasons for deviation, full justification for this should be included within the EIA.

Comments on the Scoping report

We welcome the statement that surveys have been undertaken for protected species, including bats, great crested newts (GCN), and otter.

Bats

We advise that the application is supported by up to date bat surveys of the full application site in accordance with - Bat Surveys for Professional Ecologist: good Practice Guidelines (4th Edition) by Bat Conservation Trust dated 2023.

We welcome that results of bat transect/activity surveys are being analysed, and that the results will inform consideration of potential impacts of the scheme, including impacts on greater horseshoe bats associated with Scoveston Fort Site of Special Scientific Interest (SSSI) (Section 6.3.69). We advise full details of methodologies and results are presented at full application stage. We advise management and land use of the fields is considered.

Whilst we note the stated distance between the proposed development and the Pembrokeshire Bat Sites Special Area of Conservation (SAC), we advise as part of the EIA, the results of desk study and activity surveys should be used to consider whether the development could have significant effects on horseshoe bats which are a feature of the SAC.

We note there are trees which may have potential to support bats on site. We advise that all trees needing to be felled or pruned to facilitate development (including for cable route works in riparian corridor, and any other associated works), are subject to a ground level assessment to clarify potential for bats, and those identified to have potential to support maternity roosts (PRF-M), are subject to further surveys in accordance with the published best practice survey guidance (e.g. climbed, endoscope surveys). The results of such surveys should be included in the full application.

The EIA should identify and evaluate potential impact pathways on bats both as an EPS and as a feature of the protected sites.

Otter and water vole

We welcome that otter are scoped in to the EIA and potential impact on otter as a feature of the Pembrokeshire Marine SAC will be considered. We note the report states an otter survey has been undertaken. Full details of methodology, location and scale of the survey undertaken for otter is presented within the ES.

As well as surveying for presence of otter on and adjacent to watercourses, we advise terrestrial and riparian habitats on site are surveyed to assess their suitability to support breeding or resting otter, and their use by otters dispersing through the landscape (i.e. between catchments).

Where riparian-associated woodland or other habitat is assessed as suitable to support natal holts within 200m of one of the developable areas; the relevant features should be surveyed further, including a search for natal holts and monitoring for their use by breeding otters.

We welcome consideration of impacts of the scheme on water vole. The Scoping Report states a watercourse(s) has suitability to support water vole. Full details of methodology, location and scale of the survey undertaken for water vole, and/or assessment of habitat suitability for water vole, is presented within the ES.

Surveys for water vole should accord with the guidance set out in Water Vole Mitigation Handbook (Mammal Society, 2016).

We note there may be direct impacts on the watercourse and riparian corridor in the west of the scheme as part of cable route works. We welcome proposals to consider impacts of these works on otter and water vole and this should be included in any future application.

The EIA should identify and evaluate potential impact pathways on otter, both as a European Protected Species and as a feature of the SAC. Where present, the EIA should consider impacts on water vole, setting out an assessment of the impacts of the scheme on them. It should then follow the mitigation hierarchy and overall demonstrate a conservation benefit for the relevant species.

Great Crested Newts (GCN)

We note further detail is set out regarding surveys for great crested newt than that provided at screening stage. The Scoping Report states eDNA survey was undertaken in July 2024, which is outside the best practice survey period. However, we note the lack of records for GCN around the site and in the wider vicinity. If GCN are scoped out, the full justification should be included within the EIA.

Dormouse

We note the lack of records in the area, we therefore concur that the scheme is not likely to cause a significant impact on dormouse. Measures to retain and protect hedgerows and woodland are welcomed.

Buffers

We welcome consideration of the retention and protection of hedgerows, tree lines, woodland edges and streams. We advise buffers of 7m from break of bank slope to the perimeter fence for watercourses, or to the solar panels where it is an internal watercourse. For hedgerows and woodlands, we advise buffers of 5m from edge of the habitat to the perimeter fence, or to the solar panels where it's an internal hedgerow. Buffers of this scale reduce the potential impacts on protected species which may use watercourses such as otter or water vole, and on protected species that use the hedgerows and woodland such as bats and dormouse.

Fencing

We note from the Soil section 5.3.6 and the Landscape and Visual section 6.1.39 that grazing could be introduced beneath and around the solar panels. Grazing over the projected 40 year lifetime of the development could damage the structure and integrity of hedgerows and woodlands for protected species. We therefore advise that boundary and internal hedgerows and woodlands at the project locations should be fenced from grazing stock to avoid damage and achieve broad, dense, structurally diverse hedgerows. All fencing on site should incorporate gaps to allow otter and other mammals to traverse the landscape.

Impact Assessment

Should protected species be confirmed, information must be provided identifying the species-specific impacts in the short, medium and long term together with any mitigation and compensation measures proposed to offset the impacts identified.

Comprehensive descriptions of the habitats affected should be included to support robust conclusions about their significance for the species. The EIA should consider significance (both alone and in combination) and where applicable conservation status. In respect of conservation status, we advise consideration be given to the current conservation status of the relevant species. The EIA must demonstrate that there will be no detriment to maintenance of favourable conservation status (FCS) of the species during construction, operation and where relevant decommissioning phases of the scheme.

Where proposals implicate protected species which are also notified features of designated sites (e.g. SAC, SSSI), we advise that the EIA considers the impacts on those species from both perspectives.

The EIA should set out how the long term site security of any mitigation or compensation will be assured, including management and monitoring information and long term financial and management responsibility. Where the potential for significant impacts on protected species is identified, we advocate that a Conservation Plan is prepared for the relevant species and included as an Annex to the EA.

Lighting

We advise that new and retained green infrastructure should remain unaffected by artificial lighting both during the construction and operational phases of the development. The EIA should include an assessment of the impacts of any required lighting and, should it be required, includes measures to minimise impacts.

EPS Licence

Where a European Protected Species is identified and the development proposal will contravene the legal protection they are afforded, a licence should be sought from NRW. The EIA must include consideration of the requirements for a licence and set out how the works will satisfy the three requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended).

Where a European Protected Species is present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

- (a) It satisfies an appropriate derogation or licencing purposes, which in the case of development is most likely to be preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment;
- (b) There is no satisfactory alternative and
- (c) The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

These requirements are also translated into planning policy through Planning Policy Wales (PPW) February 2024, section 6.4.35 and 6.4.36 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The decision making authority will take them into account when considering an EIA where a European Protected Species is present.

Local Biodiversity Interests

We recommend that the developer consults the local authority Ecologist on the scope of the work to ensure that regional and local biodiversity issues are adequately considered,

particularly those habitats and species listed in the relevant Local Biodiversity Action Plan, and are that are considered important for the conservation of biological diversity in Wales. NRW would expect the developer to contact other relevant people/organisations for biological information/records relevant to the site and its surrounds. These include the relevant Local Records Centre and any local ecological interest groups (e.g. bat groups, mammal groups).

Finally we advise that the development incorporates robust green infrastructure that will remain unlit to allow protected species to continue to inhabit the site and move through it. It is vital that the design of the development avoids narrow green infrastructure corridors through it, and avoids breaks in those corridors.

Response to applicant's questions

Do consultees agree with the survey methodologies carried out?

The detail of survey methodologies has not been put forward for review at this time. Comments on species specific surveys undertaken or proposed are provided above.

Do consultees agree with the mitigation strategies proposed?

We seek clarification of set buffer distances from rivers and boundary features (e.g. hedgerows and woodland habitats), to ensure the protection and retention of these features, as set out above. We cannot comment on mitigation for specific species until the methodologies and results of surveys, and the impacts on species, have been presented. We advise the EIA considers impacts of the scheme on each species, and includes detailed proposals to mitigate or compensate for them following the mitigation hierarchy.

Birds – Response to applicant's questions

Do consultees agree with the survey methodologies carried out?

The EIA scoping report does not detail the full breeding or wintering bird methodologies but we agree with both surveys being scoped in to the EIA. The surveys are expected to 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). As we are not in receipt of the full results of a desktop survey we are not able to provide an exhaustive list of the species specific surveys we would expect to be included within the EIA.

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 no limited too, 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 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).

Do consultees agree with the mitigation strategies proposed?

Given we have not been able to view the full survey results to date, we cannot provide detailed comments on the proposed mitigation strategies.

Details of appropriate mitigation (following the step-wise approach outlined in PPW12) for any likely significant effects identified should be provided along with appropriate enhancements. In some instances, mitigation may need to take the form of curtailment or redirection of activities during particular times of year.

Where buffer distances are required or need to be considered then reference should be made to Goodship & Furness 2022 or alternative published references for species not listed within Goodship & Furness 2022.

Do consultees agree with the proposed skylark mitigation strategy outlined?

The Scoping report estimated, based on the results of the Breeding Bird Surveys, that 13 skylark territories will be lost as a result of the proposals. It is agreed that including a specific Skylark Mitigation Strategy as an addendum to the EIA will be an acceptable approach to detail the mitigation proposals and compliance with the Stepwise Approach outlined in PPW 12. However, we are unable to comment further on the approach at this stage without access to the full Breeding Bird Survey results.

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)

Milford Haven Waterway SSSI and Pembrokeshire Marine SAC - Water quality

It appears that water quality impacts are scoped out in section 5.4.32 (based on the future provision of a CEMP, DEMP and Operational Surface Water Drainage Strategy) however Pembrokeshire Marine SAC and Milford Haven SSSI have been scoped in in section 6.3.19 due to hydrological connectivity.

We advise that the water quality impacts should be screened in to assess the risks, and provide (at least outline) details of the mitigation that will form part of the CEMP, DEMP and Drainage Strategy.

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 Scoping 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 Scoping 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 agree that Flood Risk can be scoped out. 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

Louise Edwards

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

E-bost/E-mail: 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 & Environment Decisions Wales
PEDW
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Dyddiad/Date: 20 March 2026

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 re-consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales' (NRW) on 27th February 2026, seeking our views on the following additional survey results.

- Badger survey results
- Great Crested Newt eDNA survey results
- Breeding Bird survey results

Please note, we have not reviewed the badger survey results, however our comments on Great Crested Newts and Breeding Birds are detailed below.

Breeding bird survey results

We have reviewed the submitted breeding bird survey 'Great Harmeston Solar Farm, 22nd January 2026, TG Report No. 16720_R02_LJ by Tyler Grange'. The report does not materially alter the advice we provided previously in our response to you dated 14 January 2026. However we have adjusted the responses below.

Do consultees agree with the survey methodologies carried out?

We agree with both surveys being scoped in to the EIA. It is welcomed that the surveys are in line with industry best practice (see Bird Survey Guidelines) and included a dusk survey visit alongside standard dawn surveys.

Considering the results of the desk study and breeding bird survey, it is not considered that additional species-specific surveys will be required to inform the full Environmental Statement

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 no limited too, 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 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 and Countryside Act 1981 (as amended).

Do consultees agree with the mitigation strategies proposed?

Given the anticipated loss of 13 skylark territories and the proposed retention of non-grassland habitats at the development site, appropriate mitigation for ground nesting birds should be outlined within the EIA chapter and secured as part of any planning approval.

Details of appropriate mitigation (following the step-wise approach outlined in Planning Policy Wales edition 12) for any likely significant effects identified should be provided along with appropriate enhancements. In some instances, mitigation may need to take the form of curtailment or redirection of activities during particular times of year.

Where buffer distances are required or need to be considered then reference should be made to Goodship and Furness 2022 or alternative published references for species not listed within Goodship and Furness 2022.

Do consultees agree with the proposed skylark mitigation strategy outlined?

The Scoping report estimated, based on the results of the Breeding Bird Surveys, that 13 skylark territories will be lost as a result of the proposals. It is agreed that including a specific Skylark Mitigation Strategy as an addendum to the EIA will be an acceptable approach to detail the mitigation proposals and compliance with the Stepwise Approach outlined in PPW 12. We do not agree that the proposals outlined in the EIA Scoping report for mitigation to *'focus on the provision of enhanced foraging habitat on Site both under and around the panels to be managed appropriately for skylark'* in the absence of providing compensatory nesting habitat would be in compliance with the requirements of the stepwise approach. Should the applicant follow the stepwise approach and conclude that the loss of thirteen skylark territories cannot be avoided or adequately mitigated for, then the applicant should consider on or offsite compensation for the loss of this habitat.

Great Crested Newt (GCN) eDNA survey results

We have reviewed the submitted Great Crested Newt eDNA survey results, 'Great Harmeston Solar Farm, 22nd January 2026, TG Report No. 16720_R03_DB by Tyler Grange'.

The report clarifies the GCN eDNA sampling was undertaken at the end of June, within the survey period for such surveys. The report also considers habitats on site and findings of the biological desk study. The findings of this report, combined with the lack of GCN records for the area, justify scoping GCN out of the EIA.

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

Louise Edwards

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

E-bost/E-mail: 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

PEDW.Infrastructure@gov.wales

Eich cyfeirnod
Your reference

Ein cyfeirnod
Our reference

Dyddiad
Date

Llinell uniongyrchol
Direct line

Ebost
Email:

CAS-04538-H9C9V8

2 February 2026

Cadwplanning@gov.wales

Dear Sir/Madam

EIA Scoping – Great Harmeston Solar Farm REF: CAS-04538-H9C9V8

Thank you for your letter of 18 December asking for Cadw's advice on the scope of the EIA and the proposed methodologies outlined in the Scoping Report for the above.

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

Within a developer 3km bare earth ZTV:

Scheduled Monuments

PE135 Long Stone Burial Chamber
PE186 Priory Rath
PE223 Rosemarket Rath
PE339 Fort Scoveston

PE476 Burnt Mound 170m S of Jubilee Cottages
PE526 Round Barrow 300m NW of Tallyho
PE572 Jordanston Farm Promontory Fort

Registered Park and Garden

PGW(Dy)19(PEM) Great Harmeston

Registered Historic Landscape

HLW (D) 3 Milford Haven Waterway

Listed Buildings

| | | |
|-------|---|-----|
| 11996 | Church of St Peter | II* |
| | St Botolph's Mansion (previously included with list for | |
| 12930 | Havarford Road) | 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 | |
| 13053 | House, including cartsheds and food processing store | II |
| 21507 | Church of St Ismael | II |
| 82524 | Haystone Bridge (partly in Llanstadwell community) | II |
| 82641 | Pope Hill House | II |
| 82642 | Outbuilding at Pope Hill | II |
| 82696 | Milepost near Redstock Bridge | 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 scoping opinion as to the contents of an Environmental Impact Assessment (EIA) that will be submitted in support of an application for a Great Harmeston Solar Farm.

The request for a scoping opinion is accompanied by a scoping report prepared by Pegasus Group with Chapter 6 explaining the sources of data and the methodologies that will be used to assess the impact of the proposed development on the Cultural Heritage and Archaeology. This chapter ends by asking consultees five questions, shown below along with Cadw's responses: -

- *Do consultees agree that a 1 km Study Area is appropriate for the assessment?*

No. In accordance with the Annex to "The Setting of Historic Assets in Wales" we expect the Study Area for designated historic assets to be 3km. To assist the developer a list of the designated historic assets inside the bare earth zone of theoretical view (ZTV) and inside 3km is given above. It should be noted that the list

of designated historic assets inside 1km of the application area given in section 6.2.9 of the scoping report does not include the registered Great Harmeston historic park and garden. This asset is located in the developer's ZTV and therefore should be included in the study.

• *Does Cadw agree that an ASIDOHL2 is not required for the Proposed Development.*

Yes. The application area is outside the boundary of the registered Milford Haven Waterway Landscape of Outstanding Historic Interest and therefore an ASIDOHL 2 is not required. However, the impact of the proposed development on the setting of the registered historic landscape will still need to be considered and this should be done by following the methodology given in "The Setting of Historic Assets in Wales"

• *Do consultees agree that all guidance relevant to assessment of effects to historic assets has been captured in (what is currently) Para. 6..2.5.*

Yes.

• *Do consultees agree that the approach to assessment of effects, including those effects scoped in and out and the cumulative assessment, is appropriate?*

Yes

• *Do consultees agree that the approach to surveys is appropriate?*

No. The wording of the sentence in section 6.2.17 "A walkover survey of the Scoping boundary will be undertaken" is ambiguous. We assume that the intention is for all of the application area to be the subject of the walkover, not the boundary of the scoping area! We would expect any historic assets identified during the walkover survey to be recorded, not only by photography, but also by a written description, which should also give a preliminary assessment of its function, date and significance. If insufficient information is available to determine the function, date and significance of the historic asset there may be a need for archaeological evaluation to be carried out prior to the completion of the EIA.

It is noted in section 6.2.16 that a geophysical survey of the application area was conducted in October and November 2025. Archaeological features identified in that survey may need archaeological evaluation to determine their function, date and significance. If archaeological evaluation is required, then in order to meet section 6.1.26 of Planning Policy Wales, this will need to be carried out before the completion of the EIA so that the information can be included.

Yours sincerely

Laura Cooper
Historic Environment Inspectorate / Arolygiaeth yr Amgylchedd Hanesyddol



Ref: DNS CAS-04538-H9C9V8

Marloes Holtkamp
Planning Officer
Planning and Environment Decisions Wales
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

By Email: PEDW.Infrastructure@gov.wales

2nd of February 2026.

Dear Marloes Holtkamp,

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

The Department considers the policies and guidance below are applicable to this assessment:

- Technical Advice Note (TAN) 6¹
- Paragraph 3.58 and 3.59 of Planning Policy Wales (PPW)²

¹ <https://www.gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities>

² <https://www.gov.wales/planning-policy-wales>

- Paragraph 6.4.3 (bullet 4) of PPW
- Policy 9 of the National Development Framework (NDF) – Future Wales³
- Policy 17 of NDF Future Wales - states '*all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment*'.
- Policy 18(11) of NDF Future Wales – sets out the requirement for '*...acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration*'.
- DCPO letter – '*BMV agricultural land and solar PV arrays*' – 1st March 2022⁴

2. Agricultural Land Classification (ALC) and BMV Policy:

The Department can confirm that we have previously engaged with the applicants' surveyor to validate the ALC surveys (x2) undertaken of a wider area of land than currently included in the proposed application red-line boundary. A copy of the ALC survey reports are attached for information.

The Department has undertaken a desk-based validation of the ALC surveys against the 'Agricultural Land Classification of England and Wales: Guidelines for grading the quality of agricultural land' (JP069 2025⁵). We can confirm the survey findings can be accepted as an accurate reflection of agricultural land quality.

This confirms the site contains Best and Most Versatile (BMV) agricultural land, as defined in PPW 12 paragraph 3.58.

It is welcome that the applicant has sought to avoid BMV agricultural land from an early stage. However, we are unclear on the figures presented in Section 5.3.3 of the scoping report relating to 'developable area' (15.85ha of BMV from a total of 76.49ha noted). Section 5.3.1 notes the proposed development will involve 128ha of agricultural land.

The DCPO letter (2022) is clear that policy applies to all BMV land identified within a development. From our measurements, there appears to be 20ha or more of BMV agricultural land within the red-line boundary. Clarification of the areas of BMV within the red-line boundary is requested from the applicant for the assessment.

The Department expects the applicant to provide clear evidence in the assessment of how PPW paragraph 3.58 and 3.59 has been addressed in:

- i. how 'considerable weight' is given to protecting BMV land from development.
- ii. demonstrating an 'overriding need' if BMV land needs to be developed, and
- iii. clear application of the sequential test approach.

BMV agricultural land must be scoped into the assessment.

³ <https://www.gov.wales/future-wales-national-plan-2040-0>

⁴ <https://www.gov.wales/best-and-most-versatile-agricultural-land-and-solar-pv-arrays>

⁵ <https://publications.naturalengland.org.uk/publication/6257050620264448>

3. Infrastructure and potential impacts on soil functions (installation and decommissioning).

The type, location and level of infrastructure proposed as part of the development will need to be fully detailed for the assessment. The Assessment should include detailed information on the total number, depth and spacing of piles installed; the extent of cable trenching and if any imported fill materials used (e.g. cement bound sand), track extent type and location, inverter pads number and locations and areas for construction compounds, etc.

The assessment will need to provide detailed information on the methodology for the installation and decommissioning of the infrastructure and, considering the soils on site, how any likely impacts have been assessed and avoided.

4. 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 welcomes that the applicant proposes to prepare a soil management scheme. This must be informed by the baseline ALC report and soil resources / physical characteristics and be considered as part of the ES process.

The Department disagrees with the applicant's statements (Section 5.3.6 and 5.3.7) regarding soil impacts, broad statements on soil health and reversibility of the development at decommissioning as this is not evidenced.

The Department considers that soils, soil functions and services should be scoped into the assessment.

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

Iwan Price
Soil, Peatland & Agricultural Land Use Planning
Welsh Government
Department for Climate Change & Rural Affairs
Landscapes, Nature & Forestry Division
LQAS@gov.wales

Enc. Copy of validated ALC Survey Reports:

Agricultural Land Classification, Great Harmeston – 3rd September 2024 – Issue 3.

Agricultural Land Classification, Haverford West – 24th November 2024 – Issue 2.

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

Eich cyf / Your ref DNS CAS-04538-H9C9V8

Ein cyf / Our ref 25/SW-7867

02 February 2026

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES)
ORDER 2012:**

Land at Great Harmeston

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.

I refer to your consultation of 18th December 2025 regarding the above pre-planning application, and advise that the Welsh Government as highway authority for the A4076 trunk road would require additional information as part of a future application.

The applicant would be required provide the following information to support an application for full planning;

1. Full details of all highway works associated with the improvement of the existing access points onto the trunk road network, to accommodate the worst case design vehicle associate with the proposed development. Detail shall include, but not limited to;



- a. General Arrangement drawings for any required junction works, with significant dimension identified (corner radii, widths, longitudinal falls etc).
- b. Visibility envelopes (junction and mainline Stopping Sight Distance (SSD)) in accordance with the Design Manual for Roads and Bridges CD 109 and CD 123 (including all additional areas of visibility included in section 3 of cd 123).
- c. Swept path analysis for the worst-case design vehicle proposed to access the site, demonstrating they will not encroach on opposing trunk road traffic lanes, with particular emphasis on the left in and left out turning manoeuvres. It should also evidence 2-way movement is achievable on the side road for the initial 20m off the trunk road running lane, or agreeable Traffic Management is in place for deliveries (please see below).

The visibility splays shown on the submitted plans of the proposed access points onto the trunk road shall at all times be kept free of any planting, tree or shrub growth, or any other obstructions, which will impede visibility.

All highway works shall achieve full compliance with the DMRB, which shall be evidenced on drawings.

2. Evidence the solar panels will be positioned and shielded as not to cause any glare or glare to highway users on the adjacent A4076 trunk road.
3. The distance between the edge of the trunk road running lane and the proposed features must be confirmed as greater than 15 metres. If the distance is 15 metres or less, a Risk Assessment (RA) in accordance with the Design Manual for Roads and Bridges (DMRB) CD377 and the Wales National Application Annex (WNAA) will be required. The RA should address factors such as road alignment, Annual Average Daily Flow (AADF), collision history, the nature of hazards being protected (including both existing and proposed on-site hazards), and the proximity to running traffic.

Since the site is located on a section of trunk road with a speed limit greater than 40 mph the full Road Restraint Risk Assessment Process (RRRAP) shall apply. Please refer to the DMRB CD 377 and our Procedure and Advice Guidance (PAG) 119/23: Requirements for Road Restraint Systems – Implementation Guide (available at GOV.WALES), for further information.

Alternately, should the applicant believe the physical features are not within 15m of the trunk road, a drawing quantifying the distance will be required.

4. No drainage from the development site shall be connected to or allowed to discharge into the trunk road drainage system, and the proposed junction shall be constructed such that the access road does not drain onto the trunk road. Evidence will be required either the improved accesses channels surface water away from the trunk road or positive drainage systems are being proposed for our consideration.
5. Drawing should demonstrate the access points shall be constructed to appropriate standards with either concrete or bituminous surfacing for at least the first 20m metres from the running edge of the trunk road carriageway.



6. No development shall take place until a Construction Traffic Management Plan (CTMP) has been submitted to, and approved in writing by, the Local Planning Authority in consultation with the Welsh Government, as the Overseeing Organisation for the Strategic Road Network (SRN). This shall include further information and plans on the following:
 - a. Means of access into site for all vehicles
 - b. Parking for vehicles associated with the works
 - c. Expected trip generation for the construction period
 - d. Delivery timings and control measures to prevent impacts on the trunk road traffic during peak periods
 - e. Loading and unloading of plant and materials
 - f. Storage of plant and materials with plans indication locations
 - g. Erection of hoarding or heras fencing (as appropriate) with appropriate signage
 - h. Measure to prevent the deposit of materials on the highway
 - i. Provision within the curtilage of the site for the parking of all construction vehicles together with a vehicular turning area. The parking and turning area shall be maintained free from obstruction at all times such that all vehicles serving the site may park within the site and both enter and leave in a forward gear.
 - j. Provisions for the construction compound within the curtilage of the site (as appropriate)
 - k. Traffic Management (TM) plans (as appropriate) with any system of temporary road signing in accordance with Chapter 8 of the Traffic Signs Manual and the Safety at Streetworks and Roadworks Code of Practice.

General Notes

1. The Applicant shall commission and pay for a Safety Audit of the scheme, (Stages 1 – 4) in accordance with the Design Manual for Roads and Bridges GG 119. The Applicant shall agree the required measures with the Welsh Government before works commence on site and will be responsible for meeting all costs associated with these works. Should the applicant believe the scheme to be exempt from an RSA, they will need to provide an exemption file note in line with GG 119 appendix A, for our consideration.
2. Section 278 Agreement The applicant shall enter into an Agreement with the Welsh Ministers under Section 278 of the Highways Act 1980 to enable the Applicant to undertake agreed improvement works on the trunk road. This Agreement will contain details of the improvement works, construction conditions and financial arrangements under which agreed measures can be put in place, including indemnifying the Welsh Ministers against third party claims. Without such an agreement in place, any consent that may be granted cannot be implemented.

For further information on this matter please refer to the Welsh Government Procedures & Advice Guidance PAG 109.18: section 38, 184, and 278 Agreements under the Highways Act 1980.



If you have any further queries, please forward to the following Welsh Government Mailbox
Lgc_development_control-south@Gov.Wales

Yours faithfully

Rhodri Thomas



BUDDSODDWR MEWN POBL
INVESTOR IN PEOPLE

Trafnidiaeth
Llywodraeth Cymru
Parc Cathays
Caerdydd

Transport
Welsh Government
Cathays Park
Cardiff





Welsh Government Motorway and Trunk Road Network

‘Pulling Together’ Best Practice for Transporting Abnormal Loads in Wales

Instructions for use:

This guidance document is intended for use by hauliers and developers planning to generate abnormal load movements on Trunk Roads and Motorways in Wales.

It outlines the statutory process for planning and conducting safe and effective abnormal load movements in agreement with all relevant authorities and organisations.

This document supersedes any previous advice issued by the Welsh Government regarding this process.

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1 INTRODUCTION

1.1 Document purpose

Our highways are, in the most part, built to accommodate a certain maximum vehicle size and weight. These vehicle limits are defined and upheld by UK law and most daily movements can be completed within them. However, some particular vehicle types and indivisible freight loads fall outside these limits and so are known as 'abnormal loads'. These typically include:

- Vehicle carrying an oversize or overweight load
- Mobile cranes
- Engineering plant
- Road recovery vehicles

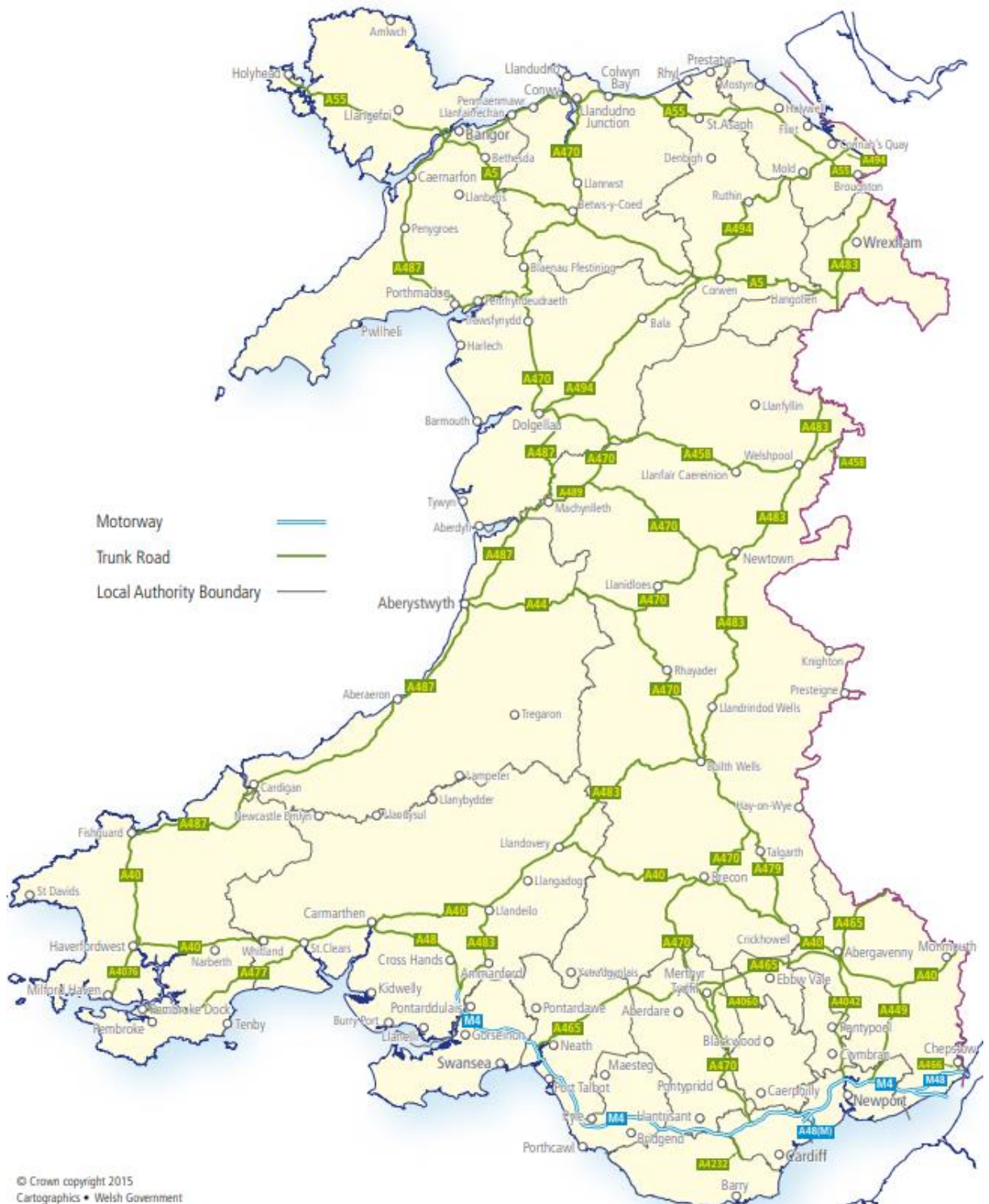


The movement of these types of loads by road is essential for supporting the UK economy, but it is also essential that the movements are carefully planned and executed to ensure they can be safely accommodated by the highway network. Movements of abnormal loads on the Welsh trunk road network (see Figure 1) can include vehicles as large as 8m wide, 55m long and 135te, while many thousand abnormal load movements take place in Wales every year. The consequences of these types of journeys being unplanned or poorly executed can therefore be significant, and include:

- Damage to the network when abnormally wide or heavy loads travel over weak structures or along narrow roads
- Delay to all road users if movement timing or route is poorly planned
- Harm to wider public if mismanaged movement results in an accident

- Delays and cost implications to industry when vehicles unable to complete journey on time

Figure 1 Trunk Road Network Wales (Traffic Wales, 2015)¹



¹ <https://traffic.wales/sites/default/files/2018-10/151021-wales-trunk-roads-map-en.pdf>

To avoid such impacts and their potential legal consequences, those responsible for transporting abnormal loads by road in the UK are required by law to plan and execute each movement in agreement with relevant authorities to ensure the incident-free passage of every load from origin to destination.

Welsh Government is the devolved government for Wales. The Welsh Ministers are the Highway Authority for trunk roads and motorways in Wales under the Highways Act 1980. They are supported by civil servant officials who work across devolved areas that include key areas of public life, including transport and the management of trunk roads and motorways.

This document therefore comprises a Welsh Government Procedure and Advice Guidance (PAG) document which aims to summarise the legal process which must be followed in the planning and execution of all abnormal load movements on trunk roads within Wales and to clarify the roles and responsibilities of the various parties involved.

By pulling together, we make roads in Wales safer and more effective.

1.2 Document structure

The document is structured as follows:

- The legal definition of an abnormal load is discussed in Section 2
- Guidance on vehicle preparation is provided in Section 3
- Guidance on journey preparation is provided in Section 4
- Planning for abnormal loads through the development control process is outlined in Section 5
- A summary of roles and responsibilities is presented in Section 6, and
- A list of useful contacts is provided in Section 7

1.3 Intended audience

This document is primarily addressed at the party responsible for conducting an abnormal load movement on Welsh trunk roads (most commonly the haulier), but is relevant to all parties involved in its safe planning and execution, as follows:

- Consigners/agents
- Hauliers
- Attendants
- Escorting services

- Police
- DVSA
- Highway Authorities and other bridge owners
- Planning authorities
- Developers / agents or consultants
- Statutory utilities

1.4 **List of abbreviations**

The following abbreviations are used throughout this document:

- AIL – Abnormal Indivisible Load
- ALO – Abnormal Loads Officer
- AWR – Road Vehicles (Authorised Weight) Regulations 1998
- STGO – The Road Vehicles (Authorisation of Special Types) (General) Order 2003
- C&U – The Road Vehicles (Construction and Use) Regulations 1986
- DBFO – Design, Build, Finance, Operate companies
- DMRB – Design Manual for Roads and Bridges
- HA&BO – Highway Authorities and other Bridge Owners
- NH – National Highways (*previously Highways England*)
- DVSA – Driver and Vehicle Standards Agency
- LA – Local Authority
- NMWTRA – North and Mid Wales Trunk Road Agent
- SWTRA – South Wales Trunk Road Agent
- TAA – Technical Approval Authority
- TMP – Traffic Management Plan
- TTRO – Temporary Traffic Regulation Order
- WG – Welsh Government

2 CATEGORIES OF ABNORMAL LOAD

Abnormal loads, and the obligations of those moving them, are defined in the UK by legislation. This section provides a summary of the different legal categories of abnormal load and their implications.

2.1 Normal vehicle definition

The maximum size and weight of vehicles which can use the UK road network without journey notification having to be provided to relevant authorities is defined by the following regulations:

- The Road Vehicles (Construction and Use) Regulations 1986 – “C&U”
- Road Vehicles (Authorised Weight) Regulations 1998 – “AWR”

These permit a vehicle and its load to use UK roads without notification as long as the combination falls within the following maximum size and weight limits:

- Rigid length: up to 18.65m
- Width: up to 2.9m
- Weight: up to 44,000kg
- Axle load: up to 10,000kg (or 11,500kg for single driving axle)

If a vehicle and its load lie outside any of these limits, it is referred to as an abnormal load.

There is no legal height limit for vehicles but, wherever possible, the overall height of a vehicle and load should not exceed 4.95m so that the maximum use can be made of the motorway and trunk road network. This will ensure that loads are less than 5.03m in height, which is the minimum maintained headroom requirement on UK highways.

2.2 Categories of abnormal loads

Legal categories of abnormal load vary to cover different combinations of vehicle size and weight. This is because different types of abnormal load have implications for both:

- Vehicle choice, and
- Route choice

The implications in each case are considered in the following subsections.

2.2.1 Abnormal loads and vehicle choice

The size of an abnormal load has implications for the size of the transporting vehicle, with larger loads generally requiring larger vehicles.

In addition, heavier loads put greater demands on a vehicle's chassis, suspension, tyres, brakes and engine, so heavier abnormal loads also require a higher specification of vehicle.

These distinctions between the impacts of size and weight result in the following abnormal load vehicle legal categories:

- C&U/AWR compliant vehicles are permitted within that legislation to carry oversized abnormal indivisible loads up to a limit, but not overweight loads
- Overweight loads, and those beyond C&U size limits, can be carried by three categories of higher specification vehicles designed to standards prescribed by The Road Vehicles (Authorisation of Special Types) (General) Order 2003 ("STGO") and are subject to lower speed limits depending on load weight
- Loads heavier and/or larger than those permitted by STGO require Special Order approval by the UK Secretary of State under Section 44 of the UK Road Traffic Act 1988

The application of these categories to abnormal load sizes and weights is summarised in the following table.

Table 1 Abnormal load legal category by size/weight combination

| Gross weight | Axle weight | Load Dimensions | | | | |
|--------------|-------------|----------------------|----------------------|---------------------|-------------------|-------------------|
| | | W ≤2.9m L ≤18.65m | W >2.9m L >18.65m | W >4.3m L >27.4m | W >5m L >27.4m | W >6.1m L >30m |
| ≤44,000kg | ≤11,500kg | C&U | C&U | STGO Category 1 | STGO Category 1 | Special Order |
| >44,000kg | ≤11,500kg | STGO Category 1 | STGO Category 1 | STGO Category 1 | STGO Category 1 | Special Order |
| >50,000kg | >11,500 | STGO Category 2 | STGO Category 2 | STGO Category 2 | STGO Category 2 | Special Order |
| >80,000kg | >12,500 | STGO Category 3 | STGO Category 3 | STGO Category 3 | STGO Category 3 | Special Order |
| >150,000kg | >16,500kg | Special Order | Special Order | Special Order | Special Order | Special Order |

Key: = Abnormal load legislation

This table highlights that:

- C&U vehicles are limited to carrying abnormal loads which are oversized but not overweight
- STGO categories increase with abnormal load weight up to 150,000kg
- Special Order vehicles are for extra heavy and/or very large abnormal loads

2.2.2 Abnormal loads and route choice

As well as vehicle type implications, abnormal loads also present route choice implications, as follows:




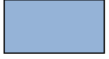


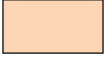
- The wider and longer a load, the greater the potential for conflict with other road users and roadside furniture / structures
- The heavier a load, the greater the potential for damage to underlying infrastructure and for delays to other road users due to slower speeds

The transporting of abnormal loads therefore presents increased road safety, infrastructure damage and traffic management risks to the network which need careful management and mitigation in liaison with relevant authorities. This is required by legislation covering abnormal load movements and the following table summarises:

- The organisations requiring pre-trip notification of the abnormal load journey details, and
- The minimum notification period in each case, where 'd' refers to working days (excluding Sundays and Bank Holidays) and 'w' refers to weeks

Table 2 Pre-journey notification requirements by abnormal load category

| Gross weight | Axle weight | Load Dimensions | | | | |
|--------------|-------------|----------------------|---------------------------|---------------------|-------------------|---------------------------------------|
| | | W ≤2.9m L ≤18.65m | W >2.9m L >18.65m | W >4.3m L >27.4m | W >5m L >27.4m | W >6.1m L >30m |
| ≤44,000kg | ≤11,500kg | N/A | Police – 2d | | Special Order | |
| >44,000kg | ≤11,500kg | HA&BO – 2d | Police – 2d HA&BO – 2d | | | Police – 2d HA&BO – 2d NH – 2w |
| >50,000kg | >11,500 | | | | | |
| >80,000kg | >12,500 | | Police – 2d HA&BO – 5d | | | Police – 2d HA&BO – 5d NH – 2w |
| >150,000kg | >16,500kg | | | | | Police – 5d HA&BO – 5d NH – 10w |

Key:  = Abnormal Load legislation  = VR1 form notice  = C&U
 = STGO C1  = STGO C2  = STGO C3  = Special Order

HA&BO = Highway Authority and other Bridge Owners NH = National Highways

This table highlights that:

- Where just load size increases, only the Police require notification, until the size reaches such that HA&BOs and National Highways require notifying also
- Conversely, where just load weight increases, HA&BOs require notification, until the weight reaches such that the Police and National Highways require notifying also
- For combinations of size and weight increases, both the Police and HA&BOs need notifying, together with National Highways for the largest/heaviest loads
- In all cases, the minimum notification period increases with load size and weight
- For loads over 5m wide, UK Secretary of State approval must be sought through submission of a VR1 form²

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/471962/VR1_form.pdf

- For loads over 6.1m wide, UK Secretary of State approval must be sought through submission of a Special Order form³

The approval of VR1 and Special Order forms has not been devolved by the UK Government to Welsh Government and so currently remains the responsibility of National Highways. However, for Special Order movements which will result in trips on the Welsh trunk road network, and for any other abnormal load movement deemed applicable, Welsh Government may require a Traffic Management Plan (TMP) to be submitted for approval before the proposed journey date. TMP requirements are defined in Section 4.1 below.

VR1 and Special Order load movements should also be planned with due cognisance of Highway England's 'Water preferred policy guidelines'⁴ which require such journeys to be completed as far as possible by either inland or coastal waters wherever it is practical, economic and environmentally desirable to do so.

2.3 Summary

UK law defines abnormal load categories based on the degree of vehicle and route preparation required in each case to ensure a smooth and safe movement, with preparation requirements increasing with load size and weight.

Further guidance on vehicle and route preparation is provided in the following two sections.

³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/503102/BE16_form_revised_Sept_15.pdf

⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/799833/WPP_guidelines_2019_DfT_consultation_revision.pdf

3 VEHICLE PREPARATION

Ensuring that an abnormal load vehicle meets legal requirements and is fit-for-purpose is essential for ensuring safe and reliable journeys. This short section is not intended to cover all legal matters relating to abnormal load vehicle preparation but summarises key requirements that contribute to safe movements through Wales.

3.1 Vehicle choice

Where the carrying of a load causes the vehicle and load to lie outside of normal C&U/AWR size and/or weight limits, the party responsible for its transportation is legally required to divide the load into smaller components wherever possible, except where this would involve undue expense or risk of damage.

Assuming the load cannot be further subdivided and so is considered an abnormal indivisible load, the selected vehicle must comply with the legislation applicable to the dimensions and weight of the combination, as set out in Table 1 above.

3.2 Signage, markings and lighting

It is both a legal requirement and best practice to clearly sign, mark and light an abnormal load vehicle to ensure the visibility of vehicle size and extremities for other road users. For a summary of requirements and best practice, refer to the following documents:

- ‘Special types enforcement guide’, by Gov.UK⁵
- ‘Lighting and marking for abnormal loads vehicles code of practice’, by National Highways⁶

3.3 Attendants

Both C&U and STGO legislation require that an attendant travel with the vehicle where:

- The overall width of the vehicle together with the width of any lateral projection or projections of any load carried on it is 3m or less but the length of any lateral projection of a load carried on it exceeds 305mm.

⁵ <https://www.gov.uk/government/publications/lighting-and-marking-for-abnormal-loads-vehicles-code-of-practice>

⁶ <https://www.gov.uk/government/publications/special-types-enforcement-guide/special-types-enforcement-guide#abnormal-loads>

- The overall width of the vehicle together with the width of any lateral projection or projections of any load carried on it exceeds 3.5m where a rigid unit and any projection of the load exceeds 18.75m in length.
- Special types combination exceeds 25.9m, the length of any forward projection of the load exceeds 2m, the length of any rearward projection of the load exceeds 3.05m.

Where attendants are required on special types vehicles and three or more vehicles are involved travelling in convoy, attendants need only be carried in the first and last vehicles of that convoy.

The attendant's duty is to warn the driver or any other person of any danger likely to be caused by the presence of the vehicle or vehicles on the road and to ensure road signs and notices are complied with.

3.4 Documentation

If UK Secretary of State approval is required and obtained for the journey via either a VR1 or Special Order form, the approval documents must be carried in the vehicle during the approved journey as the means of demonstrating authorised exemption from C&U/AWR regulations.



4 JOURNEY PREPARATION

The key to an effective and safe abnormal load journey is good preparation in liaison with relevant authorities, as required by legislation and by this document. This section provides guidance on the journey planning and notification process.

4.1 Notification requirements

4.1.1 Authorities to be notified

As summarised in Table 2 above, the relevant authorities who require notification of abnormal load movements may include:

- Police
- Highway authorities and other bridge owners
- National Highways

In Wales, highway authorities comprise:

- Local authorities for non-trunk roads, and
- Welsh Government for trunk roads (with functions delegated to NMWTRA/SWTRA and DBFO companies)

Bridge authorities/owners most commonly comprise:

- Local authorities for non-trunk road structures
- Welsh Government for trunk road structures (with functions delegated to NMWTRA/SWTRA and DBFO companies)
- Network Rail for rail bridges
- Canal and River Trust for canal bridges

4.1.2 Notice periods

Notification to relevant authorities must be provided before any abnormal load journeys take place. The minimum notification periods for each authority are summarised by abnormal load category in Table 2 above. Depending on the type of abnormal load, this shows that:

- Each Police force area traversed by the route must be given at least 2 to 5 days' notice

- Each HA&BO area traversed by the route must be given at least 2 to 5 days' notice
- If VR1 form approval is required, National Highways must be given at least 2 weeks' notice
- If Special Order approval is required, National Highways must be given at least 10 weeks' notice

Where a Temporary Traffic Regulation Order is required, it should be noted that this can also take up to 12 weeks to process (see Section 4.3.1.3 below for more information).

The reason for requiring minimum notification periods is to allow due time for notified authorities to assess the proposed journey and for applicants to satisfactorily address any issues raised before the journey takes place. More information on the notification assessment process is provided in Section 4.3 below, but it should be noted that notified journeys can only legally take place:

- If all relevant authorities are notified with sufficient notice period and either no response is received before the journey date or any response received before the journey date is addressed by the applicant to the satisfaction of the responding authority, and
- In the case of VR1 or Special Order movements, explicit written approval is received

In addition, where a TMP has been requested by Welsh Government, Welsh Police forces can request evidence of TMP approval before providing escort support services.

It is important to note that notifications which do not satisfy the legal minimum notice periods will generally not be accepted by authorities unless a movement is required as part of a genuine emergency and the notification is accompanied by a telephone call. Equally, notifications can be submitted earlier than the minimum notice period, while pre-notifications and consultations with authorities are also encouraged where there is uncertainty about whether a journey notification would be accepted.

4.1.3 Information required

4.1.3.1 Statutory notification requirements

The level of notification information required depends on the category of abnormal load being moved, with information requirements increasing with movement size and/or weight. A summary of requirements per movement category is provided in the following table.

Table 3 Information required by notification type

| Information | C&U | STGO | VR1 | Special Order |
|--|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| List of authorities notified | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Operator details | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Movement route, time and date | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Description of load | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Vehicle type and registration | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Vehicle dimensions and laden weight | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Axle weights and spacing | | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> |
| Proof of current indemnity to HW&BO | | <input checked="" type="checkbox"/> | | |
| More detailed journey information | | | <input checked="" type="checkbox"/> | |
| More detailed vehicle and load information | | | | <input checked="" type="checkbox"/> |

4.1.3.2 Traffic Management Plan requirements

Where a TMP is required to be submitted to Welsh Government (see sections 2.2.2 and 4.1.2), the following journey details should be provided:

1. Proposals for transporting AILs from their point of entry to the Welsh trunk road network to the site that minimise any impact on the safety and free flow of trunk road traffic
2. Loaded dimension and weight of AIL
3. Anticipated escort arrangements
4. Methodology for managing trunk road traffic during journey, including identification of passing places and holding areas as necessary
5. Journey contingency plans in the event of incidents or emergencies
6. Estimated journey duration and timings along the route
7. Evidence of trial run that mimics the movement of the AIL along the access route where appropriate, at the discretion of the Highway Authority
8. Swept path analysis modelling at all potential horizontal and vertical constraints along the access route where appropriate, at the discretion of the Highway Authority
9. Proposals for the temporary or permanent modification of any affected street furniture along the access route and details of how this would be managed and reinstated

4.1.4 Notification submission

All relevant notification and indemnity forms can be found on the Gov.UK website⁷ which can be emailed, faxed or posted to relevant authorities.

However, it is recommended that an online notification portal is used to submit C&U and STGO abnormal load notifications. The standard UK system is ESDAL⁸, maintained by National Highways, which allows users to:



- Plan an appropriate route according to vehicle size and weight
- Notify all relevant Police, highway authorities and other bridge owners of the planned journey
- Get advance notice of any possible route problems
- Save vehicle details and routes for future use

Subject to the preferences of individual authorities and Police forces, other online notification portals can also be used, but the applicant should satisfy themselves that any system employed satisfies all legal requirements for making abnormal load journey notifications.

The TMP, if required, should be submitted to the Welsh Government ALO, as detailed in Table 7 below.

4.1.5 Notification dispensations

Dispensations may be issued by Police to hauliers to move abnormal loads through their area without prior notification if they satisfy the following requirements:

- Abnormal loads no wider than 3.5m
- Multiple loads of a like nature on a regular basis
- Routes limited to motorways and selected A roads only

The granting of a dispensation has the potential to significantly reduce the number of notifications hauliers will have to submit. However, the dispensation should reference specific vehicles in the fleet and so are not transferable without prior notice to the Police. Drivers should also carry a copy of the dispensation and present it to an officer on request. Dispensations must be renewed annually on application and are not automatically renewed.

⁷ <https://www.gov.uk/government/publications/abnormal-load-movements-application-and-notification-forms>

⁸ <https://www.gov.uk/esdal-abnormal-load-notification>

Any dispensation granted will not take account of any roadworks commencing during the dispensation period or ongoing at the point of issue and hauliers will still be expected to check their route.

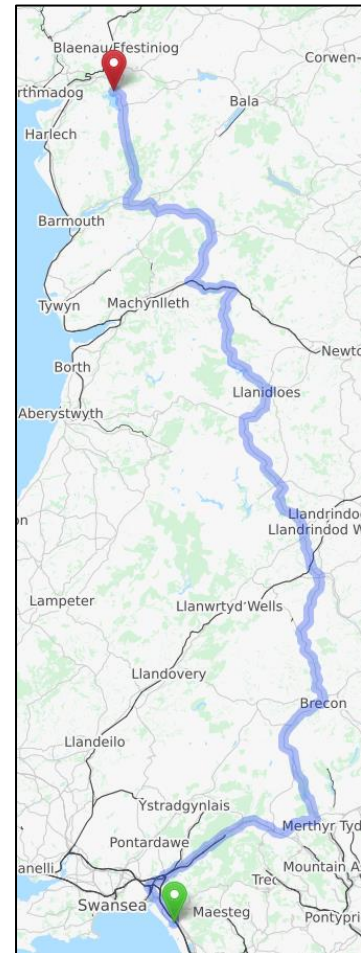
4.2 Route planning guidance

4.2.1 General principles

It is ultimately the haulier's responsibility to identify a route and execute a journey which ensures the legal, safe and least disruptive passage of an abnormal load from trip origin to trip destination. Relevant authorities will provide guidance and, where necessary, require journey amendments, but the legal responsibility and liability for the safe completion of each journey lies with the haulier.

In selecting an appropriate route for inclusion in an abnormal load journey notification, the following general principles should be followed:

- Routing preference should always be given to using the highest classification roads, with as much of the journey as possible being routed along motorways, trunk roads and A-roads. These routes are best equipped to carry large and heavy loads, and are least likely to present size and weight restrictions (the busiest abnormal load routes on the Welsh trunk road network typically include the A55, A494 dual carriageway, A483 dual carriageway and the A5 near Chirk)
- Routes should also avoid passing through population centres wherever possible to minimise conflict with both infrastructure constraints and other road users
- Routes must avoid roads presenting size and/or weight restrictions which fall within the parameters of the vehicle/load combination being transported
- One key advantage of using online journey notification systems like ESDAL is that it allows users to plot a route based on vehicle size and weight based on mapping which contains information on network size and weight restrictions.



Potential applicants should also be aware of Ordnance Survey 'Mastermap Highways Network' products which allow point-to-point route planning and contains a comprehensive and continuously updated national database of:

- Road classification and name
- Height, weight, width and length restrictions
- Turn restrictions
- Access restrictions
- Locations of bollards and traffic calming
- Narrow roads and pinch points
- Maintenance responsibility

In addition, it is recommended that applicants consider potential planned roadworks at the route planning stage using the online resources detailed in Section 4.4.1 below.

In combination with online notification portals, hauliers therefore now have access to route planning tools which maximise the chances of both successful abnormal load notifications and successful abnormal load journeys.

4.2.2 Other considerations

4.2.2.1 Travel timing

In planning an abnormal load route, the following timing related factors should also be considered:

- Journey times which exceed statutory driver working time limits will require a stopping place to be identified along the route which can accommodate abnormal load vehicles
- Journey distances which require vehicle refuelling will require a fuel station to be identified along the route which can accommodate abnormal load vehicles
- During hours of darkness, most Police forces only allow abnormal load movements to take place on motorways and on some lit dual carriageways. Journeys on all other road types which cannot be completed during daylight hours will therefore need to be routed via an abnormal load layby where layover can take place
- Some authorities will not allow abnormal load movements through their area or parts of their area during peak traffic hours. This can affect both route choice and journey timing

For planning stops and/or refuelling, National Highways publish on the Gov.uk website a list⁹ and map¹⁰ of laybys and motorway service stations which can accommodate abnormal loads.

In calculating journey times, typical congestion on the planned day of travel should be taken into account, as well as the speed limit applicable to the abnormal load vehicle type. STGO loads are speed limited by category and road type. The most common categories are limited as follows:

Table 4 STGO speed limits by category and road type

| STGO category | Speed limit | | |
|--|-------------|------------------|-------------|
| | Motorway | Dual carriageway | Other roads |
| Category 1 (width ≤ 4.3m) | 60mph | 50mph | 40mph |
| Category 1 (width > 4.3m) & Categories 2 & 3 | 40mph | 35mph | 30mph |
| Special Order ¹¹ | 20mph | 20mph | 20mph |

Source: Special Types Enforcement Guide

4.2.2.2 Escort considerations

Consideration should also be given during route planning as to whether either a private or Police escort is required to accompany the abnormal load movement.

There is no legal requirement for a vehicle moving under STGO or a Special Order to be accompanied by an escort vehicle, but National Highways advises that the following dimensions may be applied to decide if the movement of an abnormal load requires an escort:

Table 5 National Highways guidelines on escort requirements

| Abnormal load measurement | Motorway | Other |
|---------------------------|----------|--------|
| Width | >4.6m | >4.1m |
| Length | - | >30.5m |
| Weight | 130t | 100t |

Source: Lighting and marking COP for abnormal load self escorting vehicles, National Highways

The above measures are for guidance and may differ between individual Police forces who may wish to vary these requirements. The final decision rests with the Police (see Section 4.3.1.2 below).

See the full National Highways Code of Practice¹² for further details on escorting abnormal load movements.

⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/494606/Location_of_Abnormal_Load_Laybys_-_1143.pdf

¹⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/494607/Lay-by_and_MSA_Map_-_1143.pdf

¹¹For girder frame trailers over 150 tonnes and draw-bar trailers over 250 tonnes, the limit is 12mph

¹²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/503105/Lighting_and_marking_COP_for_abnormal_load_self_escorting_vehicles_HE_rebranding_v1.pdf

4.3 Notification processing

4.3.1 Police notification assessment process

4.3.1.1 Public Safety Risk Assessment

In processing an abnormal load journey notification, the primary concern of the Police is to assess the potential impact of the journey on public safety. The relevant duty officer within the Police will therefore check the notification and carry out a risk assessment based on the agreed 'risk category' levels set out below:

- Low risk notifications – no necessity for further action. General advice provided to the haulier and information on control measures if necessary.
- Medium risk notifications – the Police will check the movement complies with relevant legislation and inform the haulier if the notification is rejected. A decision on the necessity of a Police escort or further traffic management measures will be considered for all notifications considered medium risk.
- High risk notifications – the Police will check the movement complies with relevant legislation and inform the haulier if the notification is rejected. A decision on the necessity of a Police escort or further traffic management measures will be considered for all notifications considered high risk.

Based on this risk assessment, the Police forces may reject or amend any time, date or route that they consider may have an impact on public safety. If a route is deemed unsuitable, the haulier will be notified and will then be responsible for identifying an alternative route or additional traffic management measures sought from local authorities, National Highways or the Police.

4.3.1.2 Escort requirements

If the risk assessment determines that the safety of road users may be compromised to an unacceptable extent, an escort may be specified regardless of the vehicle dimensions specified in Table 5 above. The haulier will therefore be responsible for provision of an escort vehicle which conforms to the type specified by National Highways.

As per ACPO guidance, Police escorts will only be provided if specifically requested by a haulier or if the risk assessment identifies the need for temporary road closures to ensure safe passage of the load through restricted sections of the route. A minimum of 8 days notice will be required for a Police escort. If necessary, charges for Police escorts will be incurred by the haulier at 'Special Policing



Services' rates. For journeys where a TMP has been requested by Welsh Government, Welsh Police forces can request evidence of TMP approval before providing escort support services.

4.3.1.3 Temporary Traffic Regulation Order

If the risk assessment identifies the need for a temporary road closure on any section of the route, the haulier will be required to apply for a Temporary Traffic Regulation Order (TTRO) under the Road Traffic Regulation Act 1984 to allow officers and other Accredited Persons¹³ to stop and direct moving traffic or to suspend on-street parking. Applications for TTROs on the non-trunk road network should be made through the relevant local authority, and through NMWTRA/SWTRA for trunk road applications.

Hauliers should be advised that TTROs can take up to 12 weeks to process.

4.3.2 HA&BO notification assessment process

In processing an abnormal load journey notifications, the primary concern of highway authorities and other bridge owners is to assess the potential impact of the journey on highway structures.

4.3.2.1 Check for height and width restrictions

On receipt of a notification or notification enquiry, the Abnormal Loads Officer (ALO) for each of the affected HA&BOs will use details of the vehicle configuration to undertake audit checks of known height and width restrictions at structures along the route, and any other known structural constraints (temporary or permanent). Alternative routes or configurations may be suggested to avoid any identified structural constraints.

The ALO may request the haulier or enquiring party provides horizontal and/or vertical swept path analysis as necessary, based on topographical survey data. If the submitted swept path analysis is considered inadequate, the ALO may request the haulier or enquiring party undertakes a trial run to mimic the movement of the abnormal load vehicle through the constraint. The trial run vehicle should demonstrate the extent of the load envelope in terms of width and height in a clearly visible manner using a collapsible template. It should be noted that this may require a Police escort.

If the ALO is not satisfied that the constraint can be negotiated by the load, the HA&BO shall inform the haulier or enquiring party, as well as other relevant authorities as appropriate, that the load cannot be moved. WG can also implement Permanent or Temporary Traffic Regulation Orders under the Road Traffic Regulation Act 1984 to limit the maximum gross vehicle weight on a structure if required.

¹³ The Police Reform Act allows DVSA and other agencies to use Policing Powers to be able to replace officers at planned events, under the provisions of the Community Safety Accreditation Scheme (CSAS), as long as they are "employed" by the Accredited Agency to do so.

4.3.2.2 Check for structural capacity

On receipt of a notification or notification enquiry, the ALO will undertake checks referring to existing structural certification along the notified route, in consultation with the HA&BO's structures team if necessary, based on the loading and vehicle configuration.

If checks identify structures which may not be able to carry the load, the haulier may suggest an alternative route which will then need to be submitted to the relevant HA&BO for approval.

Further checks will be undertaken if an alternative route cannot be found. This will be undertaken by the ALO or a structural engineer. If these checks identify structures which would not be able to carry the load, the haulier may propose alternative vehicle configurations until a suitable configuration is found.

If neither a suitable route nor suitable vehicle configuration can be found and the HA&BO rejects the proposal to move on this basis, then the haulier may commission the assessment of route structures by a suitably qualified and experienced consultant at their own expense. All load assessments require Technical Approval according to BD2, 'Technical Approval Of Highway Structures'¹⁴. WG are the Technical Approval Authority (TAA) for Trunk Roads in Wales.



¹⁴ <https://www.croftse.co.uk/wp-content/uploads/2018/04/BD2-12-Highways-Structures-Approval.pdf>

4.4 Post-notification considerations

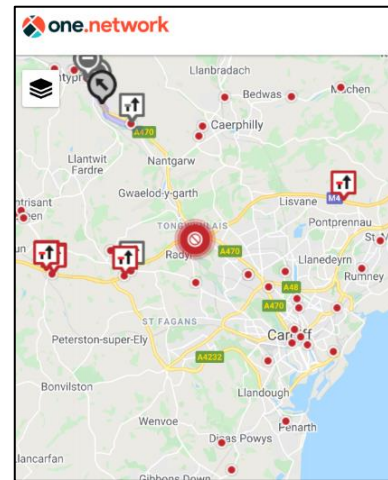
4.4.1 Roadworks and disruptions

The haulier should check for roadworks and disruptions along the route on the day of travel before commencing an agreed journey. Roadworks can particularly affect the passage of wide loads, and national details of live roadworks can be checked at <https://one.network/> or at <https://traffic.wales/> (also see Section 7 for Traffic Wales' contact details).

The haulier should consult in advance with the relevant ALO and the party responsible for the works if there is any doubt about whether the works affect the agreed route for the journey.

In the event where roadworks make the agreed route impassable, an agreement should be reached with the party responsible for the works to make passage possible at an agreed time, if feasible.

If not feasible, or if an unforeseen disruption makes a section of the agreed route impassable, the haulier is expected to assess where it is most appropriate and safe to park up and to contact the Police. If there are no safe areas then traffic management may be required to safely control traffic around the abnormal load vehicle. In addition to Police contact details, all hauliers are also recommended to carry contact details of the relevant local highway authorities and national traffic management firms to aid swift action in case of such an event.



4.4.2 Enforcement considerations

Once in transit, abnormal load vehicles can be subject to enforcement checks by either Police or DVSA officers. The vehicle may be escorted to a safe stopping place if any of the following conditions are met:

- Police have not received notification of movement
- Notification of movement is invalid due to inaccuracies
- Movement is not taking place in accordance with approved notification or authorised amendments
- Abnormal Indivisible Load vehicle or load is incorrectly marked or lit
- Abnormal Indivisible Load vehicle does not have the required attendant

- Abnormal Indivisible Load vehicle does not have the escort vehicle required by Police
- Driver is currently committing a 'driving hours' offence under tachograph regulations or will have committed an offence before reaching next stopping point
- Driver is currently committing an 'insufficient rest' offence under tachograph regulations
- Any C&U offences not exempted by STGO 2003 are evident

Where non-compliance is evident, the driver and operator are liable to prosecution under C&U regulations. Penalties for non-compliance can range from a fine¹⁵ to the temporary restriction or suspension of the haulier's operating licence by the Traffic Commissioner for Wales¹⁶. Officers might also prevent onward travel of the vehicle until any areas of non-compliance are adequately addressed.

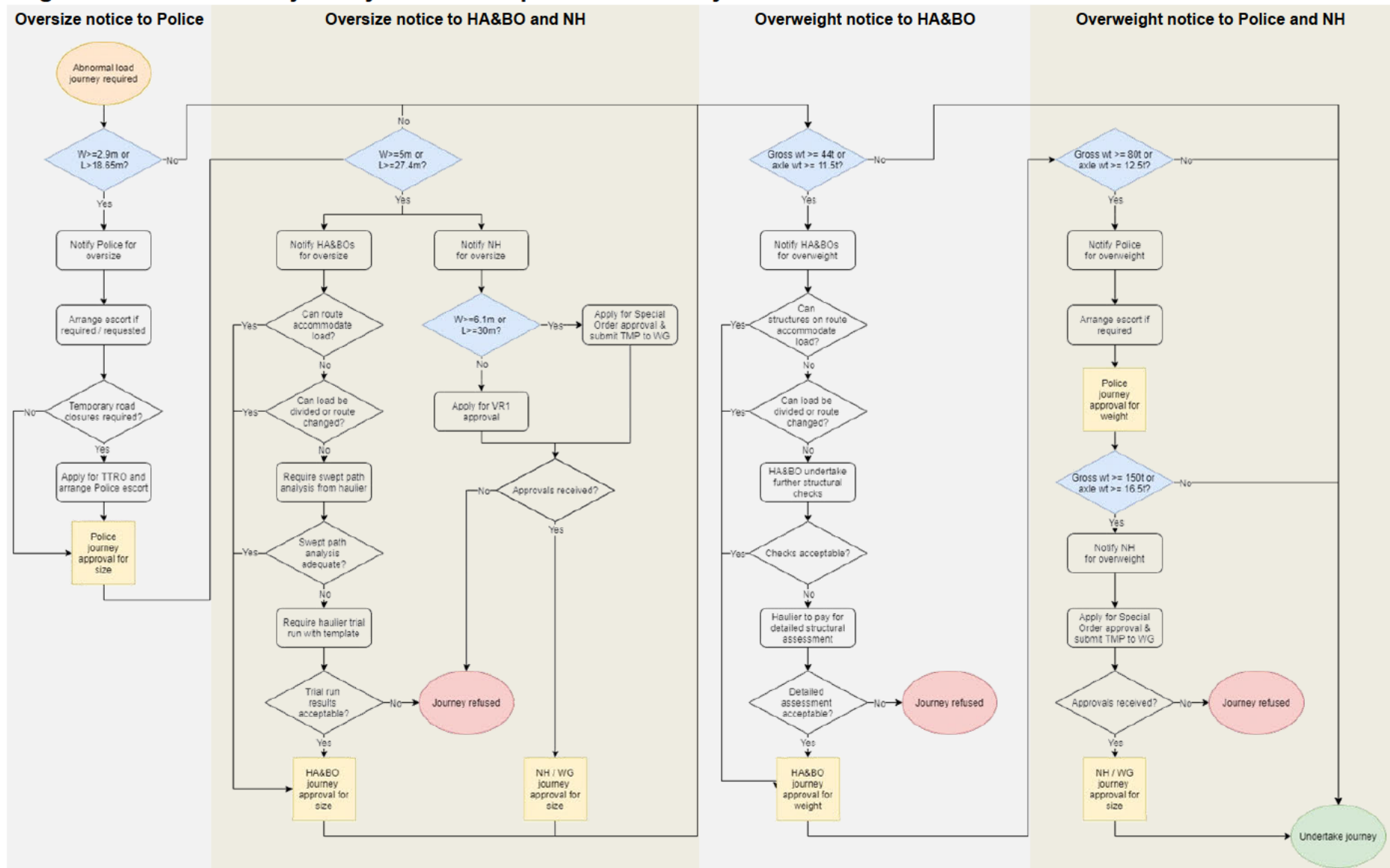
4.5 Process summary

A summary of the main steps in the legally required notification process is shown in the following figure.

¹⁵ <https://www.gov.uk/government/publications/guide-to-graduated-fixed-penalties-financial-deposits/dvsa-roadside-checks-fines-and-financial-deposits>

¹⁶ <https://www.gov.uk/traffic-commissioner/decision-and-penalties>

Figure 2 Abnormal load journey notification process summary



5 ABNORMAL LOADS AND DEVELOPMENT CONTROL

5.1 Planning applications

Planning applications for developments which are likely to generate abnormal load movements, either during construction or operation, may be required to be submitted with a Transport Assessment in accordance with Welsh Government Planning Policy Technical Advice Note 18: Transport¹⁷ Regarding abnormal load movements, the Transport Assessment should identify:

- Estimated movement volumes of abnormal loads to and from the site
- The most appropriate abnormal load routes to and from the site
- Mitigation proposals where necessary for route to safely accommodate load

Failure to demonstrate that the site can be safely accessed by the loads it will generate can be grounds for refusal of planning permission.



5.2 Planning conditions

Where planning permission is granted for a development which will generate abnormal load movements on the Welsh trunk road network, the following planning conditions will be attached.

¹⁷ <https://gov.wales/sites/default/files/publications/2018-09/tan18-transport.pdf>

5.2.1 Structural assessment

No on-site development works shall be undertaken until:

- a. an assessment of the capacity and impact on all structures along those parts of the highway network which shall be utilised during the construction of the development including bridges, culverts, retaining walls, embankments, and
- b. details of any improvement works required to such structures as a result of construction of the development

have been submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The required improvement works identified in the assessment shall be completed prior to the commencement of any Abnormal Indivisible Load (AIL) deliveries to the development site.

5.2.2 Condition surveys

Condition surveys of all highway features along those parts of the highway network which shall be utilised during the construction of the development shall be undertaken prior to, during and on completion of the construction phase of the development. The survey reports shall be submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) within 28 days of the surveys.

5.2.3 Liability for incidental damage

Prior to the commencement of development works, a scheme to provide for the remediation of any incidental damage directly attributable to the development to the parts of the highway network which will be utilised during the construction of the development including street furniture, structures, highway verge and carriageway surfaces shall be submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The scheme shall be implemented as approved throughout the construction phase of the development.

5.2.4 Traffic Management Plan

AILs associated with the development shall be delivered strictly in accordance with a Traffic Management Plan (TMP) as shall be agreed with the relevant highway authority. In this respect, the TMP shall be submitted to and approved in writing by Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of any works. The TMP shall include:

- a. proposals for transporting AILs from their point of entry to the Welsh trunk road network to the site that minimise any impact on the safety and free flow of trunk road traffic
- b. evidence of trial runs that mimic the movement of the worst case AILs along the access route where appropriate, at the discretion of the Highway Authority
- c. number and size of AILs, including loaded dimensions and weights
- d. number and composition of AIL convoys, including anticipated escort arrangements
- e. methodology for managing trunk road traffic during AIL deliveries, including identification of passing places and holding areas as necessary
- f. convoy contingency plans in the event of incidents or emergencies
- g. estimated convoy journey durations and timings along the route, including release of forecast traffic queues
- h. swept path analysis modelling the movement of the worst case AILs at all potential horizontal and vertical constraints along the access route where appropriate, at the discretion of the Highway Authority
- i. proposals for the temporary or permanent modification of any affected street furniture along the access route and details of how this would be managed
- j. plans for the reinstatement of any temporary works after completion of the construction phase
- k. land ownership must be clarified on all drawings showing proposed highway modifications. The developer shall be responsible for the acquisition and reinstatement of all third party land including re-instatement of boundary features
- l. proposals to liaise with all relevant stakeholders and members of the public regarding construction traffic and AIL movements
- m. consideration of the cumulative impact of other abnormal load generating schemes proposing to use all or part of the same access route

AILs associated with the maintenance and decommissioning of the development shall leave the site strictly in accordance with a TMP as shall be agreed with the relevant highway authority. In this respect, the TMP shall be submitted to and approved in writing by Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of any removal, replacement of decommissioning works.

5.2.5 Highway works

No development works shall be undertaken until full details of any highway works associated with the construction of layover areas, passing places and highway improvements as agreed with each relevant highway authority including:

- a. the detailed design of any works
- b. geometric layout
- c. construction methods
- d. drainage, and
- e. street lighting

have been submitted to and approved in writing by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The highway works shall be completed in accordance with the approved details prior to the commencement of any AIL deliveries to the development site.

No development works shall be undertaken until the developer demonstrates rights of access to all proposed works that are not part of the highway network to the satisfaction of the local planning authority.

5.2.6 Road Safety Audit

The applicant shall undertake a Road Safety Audit of the scheme (Stages 1 – 4) in accordance with the Design Manual for Roads and Bridges GG 119¹⁸. The applicant shall agree the required measures with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of works on site.

5.2.7 Section 278 Agreement

The applicant shall enter into an Agreement with the Welsh Ministers under Section 278 of the Highways Act 1980 to enable the Applicant to undertake agreed improvement works on the trunk road. This Agreement will contain details of the improvement works, construction conditions and financial arrangements under which agreed measures can be put in place, including indemnifying the Welsh Ministers against third party claims. Without such an

¹⁸ <http://bailey.persona-pi.com/Public-Inquiries/M4-Newport/C%20-%20Core%20Documents/6.%20Transport%20and%20Engineering/DMRB/vol5/section2/hd1915.pdf>

agreement in place, any consent that may be granted cannot be implemented.

For further information on this matter please refer to Welsh Government Procedure & Advice Guidance PAG 109/18: Section 38, 184, and 278 Agreements under the Highways Act 1980¹⁹.

5.2.8 Access onto the trunk road

Full details of the highway works associated with the proposed new access onto the trunk road shall be submitted by the applicant to WG, as the Welsh trunk road highway authority, prior to the commencement of any works on the development site. Details of proposed highway works should be as indicated on the submitted plans including the detailed design, geometric layout, construction and drainage.

The visibility splays shown on the submitted plans of the proposed new access onto the trunk shall at all times be kept free of any planting, tree or shrub growth, or any other obstruction in excess of 1.05m above the adjoining carriageway.

All highways works shall achieve full compliance with DMRB.



¹⁹ <https://gov.wales/sites/default/files/publications/2018-04/109-18-section-38-184-and-278-agreements-under-the-highways-act-1980.pdf>

6 SUMMARY OF ROLES AND RESPONSIBILITIES

The roles and responsibilities for each party set out in this document are summarised in the following table.

Table 6 Summary of roles and responsibilities of parties involved in abnormal load movements

| Party | Role | Responsibilities |
|-------------------------|---|--|
| Consigners/agents | Generating/commissioning abnormal load movement | <ul style="list-style-type: none"> Commissioning of fully compliant haulier for planning and executing abnormal load movements. Preference should be given to hauliers with FORS accreditation (see https://www.fors-online.org.uk/cms/) |
| Haulier | Preparing and executing abnormal load movement | <ul style="list-style-type: none"> Planning subdivision of loads wherever possible to avoid need for abnormal load movements (see Section 3.1) Ensuring selected vehicle complies with the legislation applicable to the dimensions and weight of the combination (see Table 1) Ensure vehicle and load is clearly signed, marked and lit according to regulations (see Section 3.2) Ensure attendants accompany vehicle if required (see Section 3.3) Carry VR1 or Special Order documents in vehicle where applicable (see Section 3.4) Notify relevant authorities of abnormal load journey with sufficient notice period, including a Traffic Management Plan if required (see Section 4.1.2) Address and, if necessary, pay for any requirements emerging from notification assessment process (see Section 4.3) Undertake/procure structural assessment if required (see Section 4.3.2.2) Accommodate for roadworks and disruptions on day of travel (see Section 4.4.1) Execute journey according to approved notification (see Section 4.4.2) and, where applicable, to approved Traffic Management Plan (see Section 2.2.2) |
| Abnormal load attendant | Accompanying abnormal load on journey where required | <ul style="list-style-type: none"> Accompany abnormal load vehicle for full journey where legislation requires Warn the driver or any other person of any danger likely to be caused by the presence of the vehicle or vehicles on the road (see Section 3.3) |
| Abnormal load escort | Escorting abnormal load on journey where required | <ul style="list-style-type: none"> Comply with National Highways guidance in vehicle preparation and abnormal load escort protocol (see Section 4.2.2.2) Comply with any specific instructions provided by Police (see Section 4.3.1.2) |
| Police | Assessing public safety impacts of abnormal load notifications, escorting where required and enforcing regulations in transit | <ul style="list-style-type: none"> Undertake public safety risk assessment for all abnormal load notifications (see Section 4.3.1.1) Advise haulier with sufficient notice if any amendments required to notified journey or if notification refused (see Section 4.3.1.1) Advise haulier with sufficient notice if private or Police escort required and if TTRO required (see Section 4.3.1.2 and 4.3.1.3) Resource the Police escort, as required (see Section 4.3.1.2) Enforce abnormal load regulations in transit for public safety (see Section 4.4.2) |
| DVSA | Vehicle standards, licencing and enforcement | <ul style="list-style-type: none"> Enforce abnormal load regulations in transit for public safety (see Section 4.4.2) |
| HB&BOs | Assessing infrastructure impacts of abnormal load notifications | <ul style="list-style-type: none"> Assess relevant journey notifications in terms of capacity of route infrastructure to accommodate proposed abnormal load dimensions and weight (see Section 4.3.2) Advise haulier if journey notification is rejected or approved (see Section 4.3.2 Error! Reference source not found.) |
| Planning authorities | Determining planning applications for abnormal load generating developments | <ul style="list-style-type: none"> Ensure planning applications consider abnormal load trip generation and demonstrate suitable routeing and, where necessary, mitigation (see Section 5.1) Apply planning conditions where necessary to ensure abnormal load routes are fully planned and approved and that all journeys are undertaken according to an approved Traffic Management Plan (see Section 5.2) |
| Developers | Seeking planning consent for abnormal load generating developments | <ul style="list-style-type: none"> Submit Transport Assessment with planning application to identify abnormal load trip generation, suitable routeing and, where necessary, mitigation (see Section 5.1) Discharge planning conditions, where applicable, by ensuring abnormal load routes are fully planned and approved and by committing to all journeys being undertaken according to an approved Traffic Management Plan (see Section 5.2) |

7 USEFUL CONTACTS

The process outlined in the above sections requires input from and contact with a number of organisations in order to ensure all relevant authorities are notified, and that abnormal load movements occur safely and without causing disruption to the network.

The following table provides a list of key contacts and contact details for queries associated with the movement of abnormal loads in Wales.

Table 7 Useful contacts for abnormal load related queries

| Organisation | Contact details |
|--------------------------------------|-----------------|
| Welsh Government ALO | [REDACTED] |
| Dyfed-Powys Police | [REDACTED] |
| Gwent Police | [REDACTED] |
| North Wales Police | [REDACTED] |
| South Wales Police | [REDACTED] |
| NMWTRA | [REDACTED] |
| SWTRA | [REDACTED] |
| Traffic Wales | [REDACTED] |
| National Highways Abnormal Loads Tea | [REDACTED] |
| Network Rail Abnormal Loads Team | [REDACTED] |
| Blaenau Gwent County Borough Council | [REDACTED] |
| Bridgend County Borough Council | [REDACTED] |
| Caerphilly County Borough Council | [REDACTED] |
| Cardiff City & County Council | [REDACTED] |
| Carmarthenshire County Council | [REDACTED] |
| Ceredigion County Council | [REDACTED] |
| Conwy County Borough Council | [REDACTED] |
| Denbighshire County Council | [REDACTED] |
| Flintshire County Council | [REDACTED] |
| Gwynedd County Council | [REDACTED] |
| Isle of Anglesey County Council | [REDACTED] |

Organisation**Contact details**

Merthyr Tydfil County and Borough Council

Monmouthshire Council

Neath Port Talbot County Borough Council

Newport City Council

Pembrokeshire County Council

Powys County Council

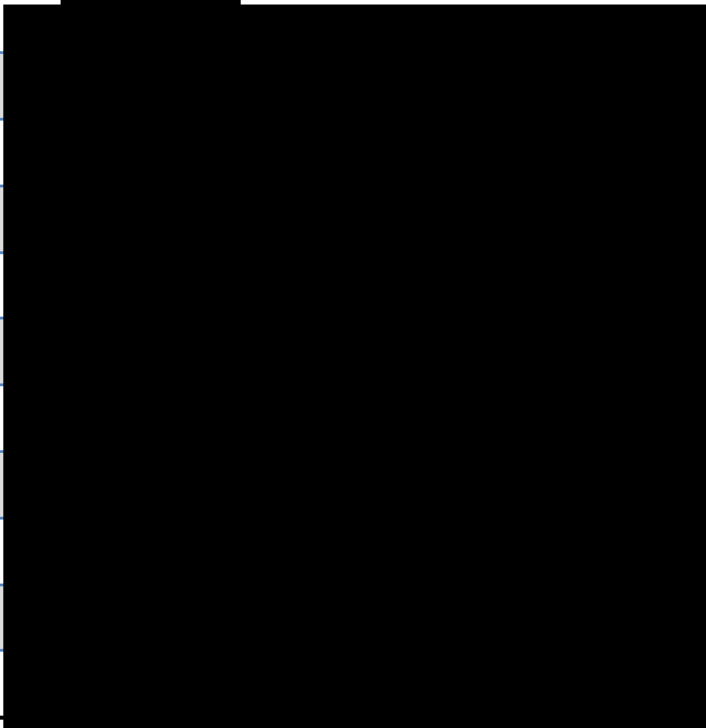
Rhondda Cynon Taf County Borough Council

Swansea Council

Torfaen County and Borough Council

Vale of Glamorgan Council

Wrexham County Borough Council



Good morning,

Following an internal review of the infrastructure project titled 'Great Harmeston Solar Farm' (DNS CAS-04538-H9C9V8), I can confirm we have no comments on the scoping report at this stage but would welcome consultation by the applicant with TfW and Network Rail at the next stage of the planning process.

Thanks,

Joshua Majer

Syrfewr Portfollio | Portfolio Surveyor

Trafnidiaeth Cymru | Transport for Wales



3 Llys Cadwyn, Pontypridd, Rhondda Cynon Taf, CF37 4TH

From: Grace Lewis [REDACTED]
Sent: 05 January 2026 14:54
To: PEDW – Seilwaith / Infrastructure <pedw.infrastructure@gov.wales>
Subject: CAS-04538-H9C9V8 - Great Harmeston Solar Farm

OFFICIAL



Network Rail
1st Floor
Bristol Temple
Point
Bristol
BS1 6NL

My Ref: P/TP25/267

Your Ref: CAS-04538-H9C9V8

Date: 5 December 2026

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

APPLICATION NO: CAS-04538-H9C9V8

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.

LOCATION: Great Harmeston Solar Farm

Dear Sir/Madam,

Thank you for your email dated **18 December 2025** together with the opportunity to comment on this proposal.

Network Rail has no objection in principle to the above proposal but due to the proposal being next to Network Rail land and our infrastructure and to ensure that no part of the development adversely impacts the safety, operation and integrity of the operational railway we have included asset protection comments which the applicant is strongly recommended to action should the proposal be granted planning permission.

Any works on this land will need to be undertaken following engagement with Asset Protection to determine the interface with Network Rail assets, buried or otherwise and by entering into a Basic Asset Protection Agreement, if required, with a minimum of 3months notice before works start. Initially the outside party should contact assetprotectionwales@networkrail.co.uk.

DRAINAGE

Soakaways / attenuation ponds / septic tanks etc, as a means of storm/surface water disposal must not be constructed near/within 5 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property/infrastructure. Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains. Network Rail's drainage system(s) are not to be compromised by any work(s). Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property / infrastructure. Ground levels – if altered, to be such that water flows away from the railway. Drainage does not show up on Buried service checks.

SOLAR PANELS

We would advise that the provision of any reflective material used in the solar collecting equipment should not interfere with the line of sight of train drivers and the potential for glare or reflection of light from the panels that may impact upon signalling **must** be eliminated. Other matters that need to be taken into consideration is the distance

between panels and the railway boundary; construction traffic; and any requirements for edge landscaping requested by the planning authority.

LANDSCAPING

Where trees/shrubs are to be planted adjacent to the railway boundary these shrubs should be positioned at a minimum distance greater than their predicted mature height from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary. We would wish to be involved in the approval of any landscaping scheme adjacent to the railway. Where landscaping is proposed as part of an application adjacent to the railway it will be necessary for details of the landscaping to be known and approved to ensure it does not impact upon the railway infrastructure. Any hedge planted adjacent to Network Rail's boundary fencing for screening purposes should be so placed that when fully grown it does not damage the fencing or provide a means of scaling it. No hedge should prevent Network Rail from maintaining its boundary fence. Lists of trees that are permitted and those that are not are provided below and these should be added to any tree planting conditions:

Permitted:

Birch (Betula), Crab Apple (Malus Sylvestris), Field Maple (Acer Campestre), Bird Cherry (Prunus Padus), Wild Pear (Pyrus Communis), Fir Trees – Pines (Pinus), Hawthorne (Cretaeagus), Mountain Ash – Whitebeams (Sorbus), False Acacia (Robinia), Willow Shrubs (Shrubby Salix), Thuja Plicatata "Zebrina"

Not Permitted:

Alder (Alnus Glutinosa), Aspen – Poplar (Populus), Beech (Fagus Sylvatica), Wild Cherry (Prunus Avium), Hornbeam (Carpinus Betulus), Small-leaved Lime (Tilia Cordata), Oak (Quercus), Willows (Salix Willow), Sycamore – Norway Maple (Acer), Horse Chestnut (Aesculus Hippocastanum), Sweet Chestnut (Castanea Sativa), London Plane (Platanus Hispanica).

LIGHTING

Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway.

Yours Sincerely,

Grace Lewis MRTPI

Town Planner (Wales and Western)

Network Rail

Temple Point, Redcliffe Way, Bristol, BS1 6NL

www.networkrail.co.uk/property

From: NSIP Applications <NSIP.Applications@hse.gov.uk>
Sent: 19 December 2025 12:50
To: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>
Cc: NSIP Applications <NSIP.Applications@hse.gov.uk>
Subject: NSIP - Great Harmeston Solar Farm - DNS CAS-04538-H9C9V8 - EIA Scoping Consultation - 4.2.1.7431. - HSE's response

Dear Marloes,

Thank you for your email dated **18th December 2025** consulting HSE on the Proposed **Great Harmeston Solar Farm** - Development of National Significance (DNS). Please find HSE's advice below.

HSE's land use planning advice

-

HSE's Land Use Planning Advice (CEM HD5 Contribution)

Will the proposed development fall within any of HSE's consultation distances?

CEMHD5 Contribution to Consultation

Will the proposed development fall within any of HSE's consultation distances?

1. With reference to the pdf with title **Site Location Plan** found in <https://planningcasework.service.gov.wales/case/CAS-04538-H9C9V8> **Reference: DNS CAS-04538-H9C9V8 - Great Harmeston Solar Farm, PDF: 2025-11-20 - NOTIFF001 - Site Location Plan** on which is shown **Red Line Boundary (PLNG Scpng- 128.57Ha)**, the proposed development falls within HSE public safety consultation zones associated with Major Accident Hazard Pipeline(s):
 - a. Haverfordwest / Thornton (HW025) [HSE ref: 7333, Transco ref: 1598] - Wales and West Utilities
 - b. Haverfordwest / Thornton (HW050) [HSE ref: 7360, Transco ref: 1619] - Wales and West Utilities
 - c. Neyland Branch (HW051) [HSE ref: 7361, Transco ref: 1620] - Wales and West Utilities
 - d. 28 Feeder Herbrandston to Aberdulais pipeline [HSE ref: 14315, Transco ref: 2768] – National Gas
2. The **Red Line Boundary (PLNG Scpng- 128.57Ha)** does not currently fall within

the consultation distance of Major Accident Hazard Installation(s).

3. HSE will not advise against the proposed development, providing no population(s), either temporary or permanent, is introduced within any of HSE's public safety zones*

* HSE's Land Use Planning Methodology

<https://www.hse.gov.uk/landuseplanning/methodology.htm>

4. Please note if at any time a new Major Accident Hazard Pipeline is introduced or existing Pipeline modified prior to the determination of a future application, the HSE reserves the right to revise its advice.
5. Likewise, if prior to the determination of a future application, a Hazardous Substances Consent is granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed project, again the HSE reserves the right to revise its advice.

Would Hazardous Substances Consent be needed?

6. The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) (Wales) Regulations 2015.
7. Hazardous Substances Consent would be required if the proposed development site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.
8. Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Would Hazardous Substances Consent be needed?

-

Explosives sites

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

Regards

Nicki

Nicki Woodruff | Business Support Team

Health and Safety Executive | Chemical, Explosives and Microbiological Hazards
Division

NSIP.Applications@hse.gov.uk





Gwasanaeth Tân ac Achub
Canolbarth a Gorllewin Cymru
Mid and West Wales
Fire and Rescue Service

Prif Swyddog Tân | Chief Fire Officer

Craig Flannery

Y Pencadlys, Lôn Pisgwydd,
Caerfyrddin, Sir Gâr, SA31 1SP
post@tancgc.gov.uk | tancgc.gov.uk

Headquarters, Lime Grove Avenue,
Carmarthen, Carmarthenshire, SA31 1SP
mail@mawwfire.gov.uk | mawwfire.gov.uk

0370 60 60 699

PEDW
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

*Gofynner am/
Please ask for:*

Watch Manager A. Thicker

Rhif Est/Extn. No.

E-bost/E-mail:

bregs@mawwfire.gov.uk

Fy Nghyf/My Ref:

AT/KDT/00361604

Dyddiad/Date:

08 January 2026

Dear Sir / Madam,

**THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(WALES) ORDER 2012**

THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016

**DEVELOPMENT PROCEDURE (CONSULTEES) (WALES) (MISCELLANEOUS AMENDMENTS)
ORDER 2021 – FIRE AND RESCUE AUTHORITIES**

RE: 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 Land at Great Harmeston, Pembrokeshire SA62 3HN

REFERENCE NUMBER: DNS CAS-04538-H9C9V8

I acknowledge receipt of the notification to the Mid and West Wales Fire and Rescue Authority in relation to the above application.

The site plan(s) of the above proposal has been examined, and the Fire and Rescue Authority would wish the following comments to be brought to the attention of the planning committee/applicant. It is important that these matters are dealt with early on in any proposed development.

- The Fire Authority has no objection to the proposed development and refers the Local Planning Authority to any current standing advice by the Fire Authority about the consultation.

The developer should consider the need to provide adequate water supplies and vehicle access for firefighting purposes on the site and general guidance on this matter is given in the attached Appendix and the following links:

<https://www.water.org.uk/national-guidance-document-provision-water-firefighting>

Rydym yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg
- byddem yn ymateb yn gyfartal i'r ddau ac yn ateb yn eich
dewis iaith heb oedi.

Rydym yn croesawu galwadau yn y Gymraeg a'r Saesneg.

We welcome correspondence in Welsh and English -
we will respond equally to both and will reply in your
language of choice without delay.

We welcome calls in Welsh and English.

EIN GWELEDIGAETH

I ddarparu'r Gwasanaeth gorau posibl i
gymunedau canolbarth a gorllewin Cymru.

OUR VISION

To deliver the best possible service for
the communities of mid and west Wales.

#eichgtacgc

#yourmawwfrs

100% wedi'i ailgylchu | recycled



Gwasanaeth Tân ac Achub
Canolbarth a Gorllewin Cymru

Mid and West Wales
Fire and Rescue Service

Furthermore, the applicant should be advised to contact the appropriate Authority responsible for ensuring safety and compliance for these types of developments i.e., Health & Safety Executive / Local Authority Building Control.

The plan(s) has been retained for record purposes.

Yours faithfully



Watch Manager A. Thicker
Authorised Fire Safety Inspector
On behalf of the Mid and West Wales Fire and Rescue Authority

Encs.

Rydym yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg
- byddwn yn ymateb yn gyfartal i'r ddau ac yn ateb yn eich
dewis iaith heb oedi.

Rydym yn croesawu galwadau yn y Gymraeg a'r Saesneg.

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#yourmawwfrs



MID AND WEST WALES FIRE AND RESCUE SERVICE

Advice on Water Supplies

1. WATER SUPPLIES FOR FIREFIGHTING

The existing output of the statutory water supply network may need to be upgraded in certain parts of the local plan area to care for firefighting needs of new developments. It is recommended that this provision be a condition of planning consent.

Reference to the National Guidance Document on the Provision of Water for Fire Fighting 2007.

Access to Open Water Supplies

Where development of water-front sites takes place, the need for permanent and unobstructed access for firefighting appliances to the water should be made a condition of any planning consent.

Consultation must take place with the Fire and Rescue Authority during the earliest planning stages of any development to ensure access for fire pumping appliances is satisfactory.

1.1. HOUSING

Minimum main size 100 millimetres. Housing developments of units of detached or semi-detached houses of not more than two floors should have a water supply capable of delivering a minimum of eight litres per second through any hydrant on the development.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.2. TRANSPORTATION

Lorry/Coach Parks - Multi-Storey Car Parks-Service Stations

Minimum main size 100 millimetres. All of these amenities should have a water supply capable of delivering a minimum of 25 litres per second through any hydrant on the development or within a vehicular distance of 90 metres from the complex.

1.3. INDUSTRY

In order that an adequate supply of water is available for use by the Fire and Rescue Authority in case of fire, it is recommended that the water supply infrastructure to any commercial industrial estate is as follows:

Light Industrial/Commercial

Up to one hectare, 20 litres per second - Minimum Main Size 100 millimetres

Up to two hectares, 35 litres per second - Minimum Main Size 150 millimetres



High Risk Industrial

Up to three hectares 50 litres per second - Minimum Main Size 150 millimetres

Over three hectares, 75 litres per second - Minimum Main Size 150 millimetres

In rural areas it may not be possible to provide sufficient mains water. To overcome this, static or river supplies would be considered on site if they are capable of supplying the above flow rates for at least one hour.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements, as high-risk premises may require a greater flow.

1.4. SHOPPING, OFFICES, RECREATION AND TOURISM

Commercial developments of this type should have a water supply capable of delivering a minimum of 20 to 75 litres per second to the development site. The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.5. EDUCATION, HEALTH AND COMMUNITY FACILITIES

Village Halls

Should have a water supply capable of delivering a minimum of 15 litres per second through any hydrant on the development or within a vehicular distance of 100 metres from the complex.

Primary Schools and Single Storey Health Centres

Should have a water supply capable of delivering a minimum of 20 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

Secondary Schools, Colleges, Large Health and Community Facilities

Should have a water supply capable of delivering a minimum of 35 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.





1.6. DISTANCES BETWEEN FIRE HYDRANTS

The distance between fire hydrants should not exceed the following:

| | | |
|--|---|--------------------|
| Residential areas | - | 200 metres |
| Industrial Estates | - | 150 metres |
| Town Centre Areas | - | 90 metres |
| Commercial (Offices & Shops) | - | 100 metres |
| Residential Hostels | - | Adjacent to access |
| Hotels | - | Adjacent to access |
| Institutional (Hospitals & Old Persons Home) | - | Adjacent to access |
| Old Persons Home | - | Adjacent to access |
| Educational (Schools & Colleges) | - | Adjacent to access |

1.7. CONCLUSION

Developers should hold joint discussions with the relevant Water Authority or the Environmental Agency and the Fire and Rescue Authority to ensure that adequate water supplies are available in case of fire.

The Fire and Rescue Authority reserve the right to ask for static water supplies for firefighting on site, as a condition of planning consent, if the supply infrastructure is inadequate for any given risk.



PEDW
Crown Buildings
Cathays Park
Cardiff
Cardiff
CF10 3NQ

Date: 25/02/2026
Our Ref: PPA0009938

Dear Sir/Madam

Grid Ref: 192495 209179

Site Address: Great Harmeston Solar Farm Land at Great Harmeston

Development: DNS - CAS-04538-H9C9V8 - The installation and operation of a renewable energy generating station

I refer to your consultation documents received in accordance with regulation 33(7) of the 2017 Regulations for the installation and operation of a renewable energy generating station and all associated works

We welcome the opportunity to comment on the proposal under regulation 33(7) of the 2017 Regulations and would offer the following standing advice which should be taken into account within any future application:

SEWERAGE

It appears the application does not propose to connect any foul water flows to the public sewerage system, and therefore Dwr Cymru Welsh Water has no objections in principle. However, should circumstances change and a connection to the public sewerage system/public sewage treatment works is preferred we must be re-consulted on this application.

As of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. It is therefore recommended that the developer engage in consultation with Ceredigion/Carmarthenshire Council, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features.

The applicant is also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

WATER ASSET

This site is crossed by a 27", 24" and 8" public watermains with their approximate position being marked on the attached Statutory Public Watermain Record. In accordance with the Water Industry Act 1991, Dwr Cymru Welsh Water requires access to its apparatus at all times in order to carry out maintenance and repairs. However, having regard to the Indicative Site Layout Plan, it appears the proposed development would be situated within the protection zone of the public watermains measured 11.6 metres either side of the centreline of the 27" & 24" mains and 10 metres either side of the centreline of the 8" main. Please note, the distance specified for this protection zone is indicative and based on industry standard guidelines. However, the depth of the asset will need to be verified on site which may infer a greater protection zone. For completeness, we recommend the developer refer to their title deeds to confirm if there are any covenants or restrictions associated with the assets crossing the proposed development site.

Our strong recommendation is that your site layout is amended to take into account the location of the assets crossing the site and should be referred to in any master-planning exercises or site layout plans submitted as part of any subsequent planning application. Alternatively, it may be possible to divert the watermains if the developer applies under Section 185 of the Water Industry Act 1991, albeit this may prove unviable for the purposes of this development, given the size of the watermains, and therefore recommend the proposed development is repositioned to accommodate for the required protection zone.

Accordingly, it is recommended that the developer contact our Plan and Protect team (PlanandProtect@dwrcymru.com) to carry out a survey to verify the location of this asset and establish its relationship to the proposed development. Further information regarding Asset Protection is provided in the attached Advice & Guidance note as well as our Developer Services website, which offers guidance on building SuDS features over or near to our assets at <https://developers.dwrcymru.com/en/help-advice/regulation-to-be-aware-of/sustainable-drainage-systems>



WATER SUPPLY

We anticipate this development will require the installation of a new single water connection to serve the new premise. The provisions of Section 45 of the Water industry Act 1991 apply. We therefore rely on the Local Planning Authority to control the delivery of any required reinforcement or offsite works by way of planning condition at planning application stage. Capacity is currently available in the water supply system to accommodate the development.

We reserve the right however to reassess our position at planning application stage to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.

We trust that you'll find our comments of assistance for the purposes of this consultation, and we respectfully reserve the right to comment further on any matters and issues arising from ongoing and future consultation. We look forward to continuing our engagement on the project prior to and during the submission of an application to the Planning Inspectorate.

If you have any questions about the above response, please contact Clare Powell who is the Development Planning Officer for Pembrokeshire at developer.services@dwrcymru.com or on 0800 917 2652. They will be happy to assist you further.

Please quote our reference number in all communications and correspondence.

Yours faithfully,

Matthew Lord
Planning Liaison Manager
Developer Services

Please Note that demands upon the water and sewerage systems change continually; consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in
Welsh and English

Dŵr Cymru Cyf, a limited company registered in
Wales no 2366777. Registered office: Pentwyn Road,
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

PPA0009938

CONDITIONS FOR DEVELOPMENT NEAR WATER MAINS

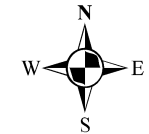
Location: **Great Harmeston Solar Farm Land at Great Harmeston**

Date: 26 February 2026

The development of the site with our water main located as shown on the attached plan will involve certain conditions which must be strictly adhered to. These are:-

1. No structure is to be sited within a minimum distance of **11.6 metres** either side of the centreline of the 27" & 24" mains and **10 metres** either side of the centreline of the 8" main. The pipeline must therefore be located and marked up accurately at an early stage so that the Developer or others understand clearly the limits to which they are confined with respect to the Company's apparatus. Arrangements can be made for Company staff to trace and peg out such water mains on request of the Developer.
2. Adequate precautions are to be taken to ensure the protection of the water main during the course of site development.
3. If heavy earthmoving machinery is to be employed, then the routes to be used in moving plant around the site should be clearly indicated. Suitable ramps or other protection will need to be provided to protect the water main from heavy plant.
4. The water main is to be kept free from all temporary buildings, building material and spoil heaps etc.
5. The existing ground cover on the water main should not be increased or decreased.
6. All chambers, covers, marker posts etc. are to be preserved in their present position.
7. Access to the Company's apparatus must be maintained at all times for inspection and maintenance purposes and must not be restricted in any way as a result of the development.
8. No work is to be carried out before this Company has approved the final plans and sections.

These are general conditions only and where appropriate, will be applied in conjunction with specific terms and conditions provided with our quotation and other associated documentation relating to this development.



LEGEND

| | | | |
|-----------------------|-------------------------|--|-----------------------|
| Clean network: | | | |
| | Sluice valve | | Stop tap |
| | Pressure reducing valve | | Water Treatment Works |
| | Meter | | Water Pumping Station |
| | Bulk meter | | Existing main |
| | Hydrant | | Non-operational main |
| | Cap end | | Raw Water |
| | Air valve | | |
| | | NB: Water main symbol colour indicates the type. | |
| | | LIGHT BLUE | - Trunk |
| | | DARK BLUE | - Distribution |
| | | YELLOW | - Raw Water |

Notes:

Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets, there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre) may be found to be asbestos cement (AC) or Pitch Fibre (PF). It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation.

Dŵr Cymru Cŷffwrdd (the Company) gives this information as to the position of its underground apparatus by way of general guidance only and on the understanding that it is based on the best information available and its warranty as to its correctness is relied upon in the event of excavations or other works made in the vicinity of the company's apparatus. This level of warning appears before carrying out any excavations made entirely on site. The information which is supplied by the Company is done so in accordance with statutory requirements of sections 105 and 109 of the Water Industry Act 1991 which is based upon the best information available and, in particular, but without prejudice to the generality of the foregoing, it should be noted that the records that are available to the Company may not disclose the existence of a water main, service pipe, service meter or other apparatus not any associated apparatus, but before 1 September 1992, or if any of the apparatus described in this position statement may not be accurate. It should be understood that the furnishing of this information is made without prejudice to the provisions of the New Roads and Street Works Act 1991 and the Company's right to be compensated for any damage to its apparatus. Service pipes are not generally shown but their presence should be anticipated.

EXACT LOCATIONS OF ALL APPARATUS TO BE DETERMINED ON SITE.

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Map Ref: 192464.209203
 Map scale: 1:3200
 Printed by: Jeremy Hackman
 Printed on: 26 Feb 2026



Planning and new development

What you should do, and how we can help





Whether you're a homeowner with plans to extend your home, a builder working on a new house or a developer working on a new housing site, you need to involve us in the planning process. Even if you are just thinking about building, getting us involved early can help your project run smoothly and address any water and drainage matters as early as possible in the development process.

How can we help?

As water and waste services are at the forefront of public health and protection of the environment, we play a key part in the town and country planning process.

If you're planning on building new houses, our team of dedicated planning officers can give you advice and guidance at all stages of the process, including pre-application, planning application and discharge of condition.

When it comes to your new development, by getting us involved in the planning stages, we can:

- Assess whether the current local water and sewerage networks have capacity to service your new site (and if they can't, then identify whether the network can be reinforced to support your new site)
- Mitigate any potential negative impact that the new development could have on the performance of our infrastructure, the service we provide to customers, and the wider environment
- Identify where new development and growth is planned so that we can target investment in our existing infrastructure within these areas
- Provide advice on making new water and waste connections to our networks once your development is complete and ready to be occupied
- Identify any existing water or waste pipes in or near to the site, so we can advise on their location and let you know your options for protecting and/or diverting our assets for the lifetime of the development





Step 1: Use our pre-planning service

What is our pre-planning service?

We encourage all developers to engage with us as early as possible to ensure any water and drainage matters that might arise during the planning process are identified and addressed early on. In order to facilitate this, you can engage with us via our dedicated pre-planning service, which will provide:

- An assessment of the impact of your proposed development and whether our local water and waste networks can support it
- Confirmation of whether off-site water mains and/or sewers will need to be provided, and
- Water main and sewer plans indicating the location of our assets crossing the site or located in close proximity. *Please note that these are for general guidance only and all assets need to be accurately located on site before any excavation works begin.*

How can I access it?

You can submit a 'pre-planning advice' application online via our website. To make sure that we can provide you with the most comprehensive advice, you should include the following information:

- Site location plan
- Details of the proposed development
- Proposed points of communication to our local network of sewers and/or water mains (if known)
- Relevant planning history relating to the site e.g. any previous permissions granted or status within the council's development plan

You can see how much this service will cost on our website, and we'll aim to get back to you with a written **response within 21 days** of your application. The advice provided will be valid for 12 months and help inform our response when consulted on your planning application by the local planning authority (LPA).

For larger developments in Wales:

- You have to undertake pre-application consultation as set out in Schedule 4 of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 for any developments that:
 - Include 10 dwellings or larger
 - Have 1000sqm or larger non-residential floor space or
 - Have a site area that's 1 hectare or larger
- This means you need to consult with us and we will **respond within 28 days**.
- While there's no charge for this service, as it's a statutory requirement, we do recommend that you apply for our pre-planning service in advance of this consultation, as it will help to identify any potential issues that need to be addressed in advance of your planning application.





Step 2: Once you have our pre-planning advice



Locate our assets

Before you build, it's important to identify if any of our pipes, water mains or sewers are underneath the ground in or adjacent to your development site. Under section 159 of the Water Industry Act 1991, we have the rights of access to inspect, maintain, adjust, repair or alter any asset or apparatus at all times.

If your land does contain assets

If your land does indeed contain some of our assets, then this will have an impact on the layout and general arrangement of the new development site. We strongly recommend that you contact us to discuss accurately locating our assets to ensure that they are protected during and after construction. Please contact our Plan and Protect team via planandprotect@dwrcymru.com or 08009172652 to discuss further.

If you want to divert or remove the assets contained in your land

If you decide the asset located within or adjacent to your site can't be incorporated within the layout of the new development, or our rights of access to the asset may be hindered by your proposal, you can ask us to alter, divert or remove it in accordance with section 185 of the Water Industry Act 1991. You can find the application forms on our website.

How will you manage surface water?

As with all new development sites, you'll need to think about how to deal with surface water runoff from any new buildings and hard standings. Legislation in both England and Wales now actively encourages the use of sustainable urban drainage systems (SUDS). This approach manages surface water runoff by imitating natural drainage systems and retaining water on or near the site.

There are such a variety of SUDS techniques including green roofs, rainwater harvesting and permeable pavements that any development should be able to include a SUDS scheme. There would need to be good justification not to incorporate a SUDS scheme on your site.

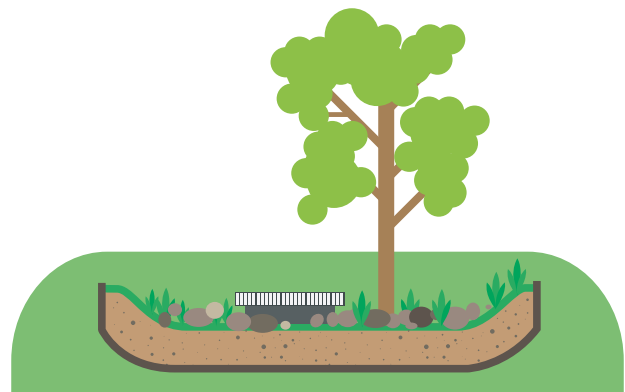
SUDS in Wales

All new development of more than one building or a construction area of 100m² or more will require consent from the sustainable drainage system (SUDS) approval body (also known as a SAB) for any new SUDS features, as required by Schedule 3 of the Flood and Water Management Act 2010. SABs are delivered by local authorities across Wales.

In accordance with this and the Welsh Government 'Statutory standards for sustainable drainage systems', you need to explore and fully exhaust all surface water drainage options, using discharge to a combined sewer only as a last resort.

SUDS in England

Even if your new development is based in England, it's important to keep Part H of the 'Building Regulations 2000' in mind. On this basis, all new developments in England will also be expected to consider surface water management techniques and demonstrate all technical options have been explored and exhausted, in liaison with the land drainage authority and/or the Environment Agency. You need to consider the management of highway or land drainage runoff as these flows won't be allowed to discharge directly or indirectly into the public sewerage system.



Step 3: The planning application process

Once you've used our pre-planning service and identified any potential issues before building, it's time to incorporate our advice into your proposals to your local planning authority (LPA).

As part of the planning application consultation process we will provide similar advice to that provided in our pre-application **response within 21 days**. It's important to note that while we share our expert opinion during this process, the ultimate decision to grant planning permission is the LPA's.

What are the options if we can't currently support your development?

Network hydraulic modelling/WwTW feasibility studies

As our aim is to support economic development and growth, we do not want to resist new development where possible. However, we must take the capacity of our existing assets, the service we are providing to existing customers and the environment into account. In areas where there are capacity constraints either on our networks or at the wastewater treatment works (WwTW), we may well already have proposals in place to deliver reinforcement works and to create capacity for new developments.

That being said, you may want to develop your site in advance of us undertaking these works. If this is the case, to ensure there's no detriment to our existing customers, you may be required to implement solutions identified by an assessment of either the network or WwTW. It's important to note that you won't be expected to resolve any existing operational issues.

Where further assessments are recommended, you will need to allow sufficient time in your development programme for these studies to be carried out and any reinforcement works to be delivered, as in some circumstances we won't permit a communication to our networks until these works are completed. The delivery of the works will need to align with occupation rather than construction.

Where possible, we will control the delivery of any solutions as part of the planning process. Dependent on the progress of the assessment, we may be in a position to recommend appropriate planning conditions so that the outcomes of the assessment can be delivered as part of any planning permission.

This approach allows us to support the progression of the site through the planning process, however in the absence of a completed assessment and known solutions we may need to work with you and the LPA until the assessment is completed and the outcomes are known.

Step 4: Connecting to our network

If you've had the green light from us and planning permission has been granted for your development, then it's time to start thinking about the different ways you'll need to connect to our network.

On our website you can find detailed guidance around applying for new water connections, new water mains, new public sewers and new sewer connections.

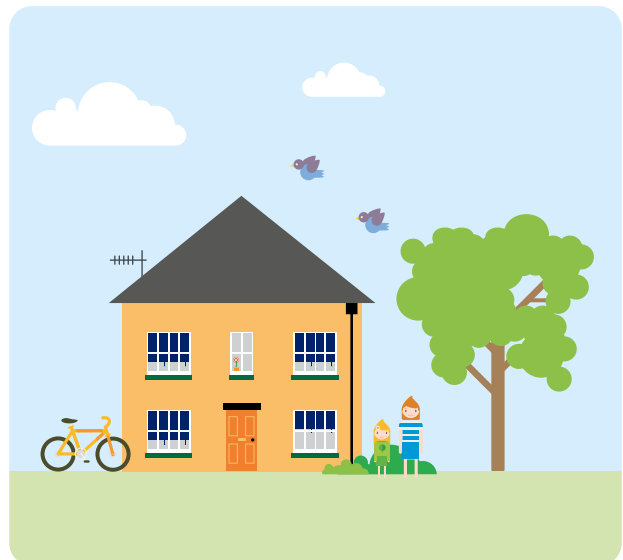
Contact us

If you've still got any questions or queries, then feel free to contact us:

Email: developer.services@dwrcymru.com

Visit: www.dwrcymru.com

Tel: 0800 917 2652





Contact Us:

If you've got any questions or queries,
then feel free to contact us:

Call

0800 917 2652

Email

developer.services@dwrcymru.com

Visit

www.dwrcymru.com



@dwrcymru



/dwrcymruwelshwater