

PHOENIX SOLAR PARK



Pre-Application Consultation Report December 2023

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PRE-APPLICATION CONSULTATION REPORT

January 2024

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1 Introduction

1.1 Purpose of This Report

- 1 This Pre-Application Consultation Report has been prepared and submitted by Wessex Solar Energy. It forms part of a suite of documents in support of an application which seeks 'full' planning permission for the development of a solar park located approximately 0.7 kilometres (km) south east of Cosheston, and approximately 2.5 km north east of Pembroke.
- 2 This report seeks to demonstrate compliance with The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016.

1.2 The Site

- 3 The proposed Solar Park is located entirely within the site shown in Figure 1.1, which is centred at Ordnance Survey (OS) Grid Reference 201580, 203280. The site comprises three fields, totalling 13.94 ha.
- 4 The proposed Solar Park site falls within the jurisdiction of the Pembrokeshire County Council, and the relevant community council is Cosheston.
- 5 There are a small number of scattered houses in the vicinity of the proposed Solar Park site.
- 6 No public footpaths or bridleways cross the site.
- 7 The site is flat for the most part, with a north-south slope which is more exaggerated in the northern part of the site. The site altitude varies from approximately 35 m Above Ordnance Datum (AOD) to approximately 20 m AOD.
- 8 Site access would be along the A447, turning onto the access road to Lower Nash Farm and entering the site via an existing access point in the south west corner of the south western most field. Environmental Statement Volume 1; Section 13 (doc ref BL001).
- 9 This Pre-Application Consultation Report should be read alongside the following reports and plans submitted in support of this application:

10 Documents

- Vol 1: ES Main Report (Document Reference: BL001)
- Vol 2: Technical Appendices (Document Reference: BL002)
- Vol 3: Figures (Document Reference: BL003)
- Vol 4: Non-Technical Summary (Document Reference: BL003)

- Non-EIA Technical Assessments (Glint and Glare, Tree Survey Report, Operational Noise Statement) (Document Reference: BL005)
- Planning Statement (Document Reference: BL006)
- Pre-Application Consultation Report (Document Reference: BL007)
- Design Access Statement (Document Reference: BL008)
- Draft Code of Construction Practice and Construction Environmental Management Plan (CEMP) (Document Reference: BL009)

11 In addition to the Figures contained in ES Volume 3 the following plans also form part of the planning application:

12 Plans

- Plan A – Site Boundary and Indicative Layout
- Plan B – Existing and Proposed Elevations
- Plan C – Topographical Survey Plan
- Plan D – Land Ownership Boundary

2 Consultation Process and Responses

- 13 This section seeks to demonstrate compliance with The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 by setting out how owners of adjacent land and neighbouring properties have been consulted to date and how the proposals have been amended to take into account the consultation responses received.
- 14 In addition to the above consultation exercise, previous consultation was completed in 2020 for a larger site than is now proposed. This comprised:
- Formal EIA Screening Request and Pre-application Advice Request were made to PINS Wales and Pembrokeshire County Council in January 2020;
 - Design Consultation with:
 - Pembrokeshire Coast National Park Authority
 - Pembrokeshire County Council
 - CADW
 - Dyfed Archaeological Trust
 - Ongoing consultation with CADW and Dyfed Archaeological Trust regarding the scope of surveys and assessments;
 - Informal consultation with Cosheston Community Council; and
 - The Transport Division at Welsh Government were also consulted on the proposals and provided comments on 3rd August.
 - Consultation during the determination period of the DNS application for the original larger proposed solar park site.
- 15 The details of the responses received and how the various issues are addressed by the planning documents being submitted are included within Table 1 and within each technical chapter of Environmental Statement Volume 1 as appropriate. The details of queries raised during the determination of the DNS application are included in Table 3.

2.1 Consultation Period

- 16 This report will be updated following a 28 day consultation period for the draft application in accordance with The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016.

2.2 Site Notice

- 17 A copy of the site notice which will be displayed on site is provided in Appendix A. The site notices will be displayed throughout the 28 day period.

18 As can be seen from the notice appended, the site notice includes all information required.

2.3 Making Information Available

All supporting draft reports and plans have been made available electronically for the entire consultation period. Access can be obtained using the links below:

- www.wessexsolarenergy.co.uk/PhoenixSolarPark.zip

2.4 Notification of Owners of Adjoining Land

19 A consultation notice will be issued to the landowner of the site to which the application relates. A notice will also be posted to all adjoining landowners.

20 A copy of the notice is provided in Appendix A. As can be seen, it contains all required information.

2.5 Community and Specialist Consultees

21 As part of the pre-application consultation process, community and specialist consultees will be notified of the availability of the draft planning application.

2.5.1 Community Consultees

22 Notification will be sent to Cosheston Community Council via email and to the Councillor representing the electoral ward in which the development is situated. A copy of the notification is provided in Appendix A.

2.5.2 Public Consultation

23 Consultation with the local community and other stakeholders is seen by Wessex Solar Energy as an important part of the development process.

24 The nature of the development is such that it will have relatively localised impacts when compared to a project such as a wind farm which can be seen over many miles.

25 Based on a zone of theoretical visibility (ZTV) and site visits 446 properties were identified which either had potential views of and/or who lived not far from the site.

26 In addition to the required consultation set out in this document, an information booklet will be prepared and sent to the 446 residents along with a feedback form and a pre-paid return envelope. A copy of this booklet can be seen in Appendix D of this document. The booklet and feedback form include options to request a call back by telephone or a reply to any questions by email / in writing to try and ensure that where ever possible we could provide the information that residents might wish to have.

2.5.3 Specialist Consultees

27 In accordance with The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016, the following specialist consultees were formally notified regarding the availability of the draft application:

- The Welsh Ministers (Trunk Road Agent and Transport, CADW)
- Natural Resources Wales
- Local Highways Authority
- Coal Authority
- The Health and Safety Executive
- The Local Planning Authority
- Dyfed Archaeological Trust (DAT)
- Dwr Cymru / Welsh Water

28 In addition to the above, a copy of the notification sent to the Consultees is provided in Appendix C.

2.5.3.1 Responses Received from Specialist Consultees

29 The draft application addresses all of the aspects and issues raised as part of the consultation and determination process for the original larger application site. Details of which parts of the Environmental Statement and supporting documentation have addressed each issues raised are provided within the individual Technical Chapters contained in Environmental Statement Volume 1 (doc ref BL001). A summary of all consultation responses received can be found in Table 1, Table 2 and Table 3 below.

Table 1: Specialist Consultee Responses for the larger Blackberry Lane Solar Park proposals


Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
Pembrokeshire County Council	26 th June 2020	Design Consultation via email	<p>A response was received on 16th September 2020 as follows:</p> <p>In looking at the LVIA which commences at page 55 of their Environmental Assessment Report within appendix 2. A number of observations arise:-</p> <p>1) The consultant states that their appraisal is not for this specific development, which isn't much help really. I copy the disclaimer from their Introduction below:-</p> <p><i>1.2 This is not an assessment of a fixed development proposal; the appraisal defines the existing landscape and visual baseline environments; assesses their sensitivity to change; describes the key landscape and visual related aspects of the development;</i></p>	<p>The LVIA referred to in the response was an initial Landscape and Visual Appraisal that formed part of the Preliminary Environmental Assessment submitted as part of the initial pre-application advice request, ahead of design consultation responses and a fixed proposal. No Change</p> <p>No action taken as this has been superseded by the detailed Landscape and Visual Impact Assessment contained in Environmental Statement Volume 1 Chapter 8. No Change</p>


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			<p><i>describes the nature of the anticipated changes and potential effects arising and potential for mitigation of effects.</i></p> <p>I'm not sure what we should make of this therefore; it makes the right overtures about helping the proposal along but only after an introductory 'get-out' clause. What's the purpose?</p> <p>2) Mitigation. There are numerous references to the hedges being maintained at 4.0m following development, in an effort to screen the development from view. In para 6.29 it refers to the height being 3.5m. This is not a significant difference but the authors might want to be consistent in what they are proposing, and the effects derived there-from.</p>	<p>No action taken as this has been superseded by the detailed Landscape and Visual Impact Assessment contained in Environmental Statement Volume 1 Chapter 8. No Change</p>

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
			<p>3) Cumulative effects. I have not seen an assessment of the effects of this, although the methodology for undertaking it has been described. In this regard I have concerns over the effects on the settlement of Cosheston. Cosheston is a well-nucleated settlement that has numerous qualities, not least the presence of its own Conservation Area and the National Park abutting its northern edge. In addition it has a very evident historic small-scale field pattern, and the high quality artery of the Daugleddau river system extending to its edge and providing the foreground arrival feature to most (assumed) visitors or residents. The difficulty of arriving at the correct measure of cumulative impact is gauging the effect of the existing condition, (referred-to as the 'baseline') what might be predicted by the arrival of the new entity (the</p>	<p>No action taken. The potential cumulative impacts of the proposed solar park alongside the two existing solar parks located in the vicinity are considered in detail in Environmental Statement Volume 1: Chapter 8; Section 8.10. No Change</p>

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
			<p>proposed solar park) and seeking to identify the subtle effects of the combination. The screensnip (below) taken from the Site Context Aerial Photograph Figure LVA 2 of the Landscape and Visual Appraisal shows the context of how Cosheston sits, between two ‘bookends’ of solar parks. Whilst each individually has its own level of visual impact (individually argued to be acceptable by the developer, and the existing one to the west having been deemed acceptable by the LPA) there is the risk that the effect of the proposed solar park will compromise the rural quality of the eastern edge of countryside of about 600 metres leaving it more vulnerable to ‘infill’ type development, should the solar park be approved. Viewpoint 5, and to a lesser extent VP 8 illustrate this case. I do not think the cumulative effects have been</p>	

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			<p>sufficiently explored, particularly in the manner I outline here.</p> <p>4) The photomontages showing the effects of the development at VP's 4 and 7 are made to appear a brown colour; this gives the effect of bare earth e.g. after ploughing. I struggle to believe this is very representative of the actual visual effect. Granted this is from the north and therefore showing the rear of the panels. I think it would be useful to see an actual example of what these panels look like from the rear and from similar distance and angle.</p>	<p>No action taken. The grey/blue colour of the back of the panels shown in the photomontages is based upon real time photographs from other existing solar parks. The photograph below allows a direct comparison between the back of some existing panels at Golden Hill Solar Park, with existing metal structures at the Substation. No Change</p>

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			<p>5) On the matter of appearance, I am concerned about the scale of these elements. We have become accustomed to relatively modest sized panels thus-far in the County but the proposed panels are going to be very large and out of scale with the human form, being 12.48m long x 6.64m wide, set at between 1.0 and 3.5 m high (front/rear respectively) approximating to the size of a bungalow each. This could have a disturbing effect where they are visible, especially from the front or sides. The assessment focuses on the overall effects of the solar park from the stand-point of longer</p>	 <p>This photograph shows that on a sunny day the colour of the panels is similar but slightly darker than that of the exiting substation fencing. With reference to the photomontage from Viewpoint 4, it can be seen that the shading used for the back of the panels is a similar but slightly darker colour than the back of the steel road sign located in the foreground to the left of the image. No Change</p> <p>We feel that this demonstrates that the shading of the panels used within the photomontages is a reasonable representation of how they would be viewed from this location. No Change</p>

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			<p>views, but no mention is made relating to scale and textural effects created.</p> <p>6) Similarly the inverter buildings are quite large, and the control building even larger. These could add to the visual impact and I did not notice any reference to colour or finish or how their visual effect might be mitigated. I did not see the Control Building located on the layout plan, where the inverter buildings were identified.</p>	<p>No action taken. The length of the panel racks (12.48m) is a proposed arrangement for individual panels which are in themselves only 1.13m x 2.21m. As can be seen from the Google Earth image below of the existing Golden Hill Solar Park, the length of the panel racks would not be out of character with other solar development in the area who install shorter racks adjacent to each other creating one continuous row. No Change</p>  <p>The approved panel arrangement across the Golden Hill Solar Park comprises continuous rows with 4 panels in a landscape orientation making the total width approximately 4m. Although less than the 6.64m proposed at Blackberry Lane, the overall appearance of the panels</p>

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				<p>will remain similar, creating a linear pattern of solar panel blocks interspersed with grassland. No Change</p> <p>The control building is located near to the proposed site entrance. The colour and finish can be agreed with the Local Planning Authority and controlled by condition. No Change</p>
Pembrokeshire Coast National Park	26 th June 2020	Design Consultation via email	<p>A response was received on 24th August 2020 as follows:</p> <p><i>'The Pembrokeshire Coast National Park (PCNPA) welcomes the additional information submitted in support of the Landscape and Visual Assessment (LVA); which has responded to comments previously made by the PCNPA. To re-iterate we support the submission of a comprehensive Landscape and Visual Impact Assessment as part of the scope of an Environmental Impact Assessment.'</i></p>	<p>A detailed Landscape and Visual Impact Assessment is provided in Environmental Statement Volume 1 Chapter 8 and Technical Appendices A8.1 – A8.5. No Change</p> <p>All landscape mitigation and viewpoints detailed within the design consultation are included within the LVIA and accompanying figures (Figures 8.1-8.8 and Viewpoints 1-10). No Change</p>

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			<p><i>The inclusion of viewpoints from Carew is welcomed and we note that this demonstrates that the development will be screened from this site. The landscape mitigation and additional information on the nature of the proposed development are also appropriate and should be incorporated into the EIA.</i></p> <p><i>To conclude the PCNPA consider that a Landscape and Visual Impact Assessment should be within the scope of the Environmental Impact Assessment. The additional information that has been submitted addresses points previously raised by the authority and we support its inclusion in the EIA. The LVIA should also fully consider the impact of the development on the Special Qualities of the National Park.'</i></p>	<p>The special qualities of the National Park are considered in detail in Environmental Statement Volume 1 Chapter 8 Section 8.5.5. No Change</p>

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Cadw	26 th June 2020	Design Consultation via email	Following ongoing consultation on the development proposals (detailed in ES Vol 1: Chapter 10 (doc ref BL001), Cadw confirmed on 30 th June 2020 that they did not wish to make any comments on the proposed design.	No Action Required. No Change
Dyfed Archaeological Trust	26 th June 2020	Design Consultation via email	<p>Thank you for sending the files showing detailed proposals for the proposed Blackberry Lane Solar Park development. I have now also received the draft report on the results of the archaeological trenching works. The Red River Archaeology field team (and Will, of course) were very helpful and communicative in allowing me to monitor the works remotely and we are happy that the archaeology within the site boundary has been suitably evaluated.</p> <p>It is good to see that it is proposed to exclude the areas of archaeological significance from the development. Preservation <i>in</i></p>	<p>The AAIs were reviewed, and minor amendments made to ensure that a 10m buffer was included from all known recorded archaeological remains. See Figure 1.2.</p> <p>Results of the walkover survey have been included in the evaluation trenching report, as this was carried out during the evaluation works, which allowed for a thorough walkover to be undertaken. No earthworks of archaeological interest were noted.</p> <p>AAI's are no longer within the proposed Development Boundary.</p>

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			<p><i>situ</i> is always our preferred position. Please could you confirm that these areas will be fenced off and that there will be a buffer of at least 10m from the known archaeological deposits.</p> <p>It is usual practice to see both direct impact on archaeological deposits and visual impact on the setting of historic assets assessed within a DBA but we understand that the settings impact assessment will be presented in a separate report, which we have not yet seen. The photo-views and photomontages are very useful but we still require an experienced, qualified archaeologist to make a field visit to assess these potential visual impacts. We appreciate that this may not have been possible during the height of Covid-19 lockdown when travel in Wales was heavily restricted but hopefully the situation has now</p>	

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			changed sufficiently to make it feasible. We were told that a walkover survey of the proposed development site was not carried out for this same reason and we asked that this should be undertaken by the archaeological contractor in advance of trenching – the results of this should now be included in the DBA.	
Pembrokeshire County Council Ecologist	May 2020	Verbal Communication regarding the scope of breeding bird surveys	It was agreed that breeding bird surveys were not necessarily required providing adequate evidence could be provided to demonstrate this.	ES Volume 1 Chapter 9 assesses the potential impact upon breeding birds and concludes that no breeding bird surveys were required. No Change
Transport Division of Welsh Government	6 th July 2020	Traffic Summary and Access Appraisal issued via email	Response received on 3 rd August 2020: With regard to this site, we would not foresee that the access at this point cannot be used for delivery, although we require significantly more detail in the form of a construction traffic management plan that includes details to allow	A Draft Construction Traffic Management Plan (doc ref BL011) containing the requested information is provided as Appendix A13.1. Additional information is also provided in ES Vol 1; Chapter 13; Section 13.6 (doc ref BL001). Additional measures agreed and have been included with the Draft CTMP and are detailed in Table 3.

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			<p>for management of the turning movements of low loaders to and from the trunk road. The swept path shows considerable swinging out and this needs to be safely managed under traffic management for which we request detail.</p> <p>Also, methods of mitigating for trunk road impacts such as blocking back and reversing from the narrow lane should be provided – schedule and adequate passing places should form part of this.</p>	
Trunk Road Agent and Transport Division of Welsh Government	21 st September 2020	Formal notification of draft application publication issued by email	Receipt acknowledged. No further comments received.	No Action Required. No Change
Cadw	21 st September 2020	Formal notification of draft application	Response received on 5 th November <u>Advice</u>	DAT have already been consulted. No Action Required. No Change

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
		publication issued by email	<p>Based on the information received with this pre-application, Cadw has no objections to the above development.</p> <p><u>Assessment</u></p> <p>The impact of the proposed development on the settings of the designated historic assets listed at Annex B are considered in chapter 10 of the environmental impact assessment based on a detailed assessment carried out by Orion Archaeology.</p> <p>This work identified that the only designated historic asset which would be subject to an adverse effect would be the Church of St Mary, which is situated 225m to the west of the proposed development, as the proposed development may be visible through gaps in the existing hedges. This would have a potential slight adverse impact. However, to mitigate this impact it is proposed to extend the existing hedges across the gaps in them</p>	

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			<p>and it is expected that inside 5 years the new planting will block all views of the solar farm from the church thus reducing the impact of the proposed development to very slight or neutral. Cadw concur with the results of this assessment.</p> <p>As part of the works to produce the environmental impact assessment a desk-based assessment, geophysical survey and archaeological valuation were carried out. These works have identified a potential prehistoric barrow cemetery, a Neolithic or Bronze Age enclosure and an undated enclosure. The areas these site are located in have been removed from the proposed development and will be fenced during the construction of the solar park, in order to prevent accidental damage to them. In our opinion, these are appropriate measures to preserve these archaeological sites.</p>	

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			<p>In conclusion, the impact of the proposed solar farm on the historic environment has been properly assessed in the environmental impact assessment and the proposed mitigation measures that will be introduced into the proposed development will ensure that there are no significant impacts on it.</p> <p>Finally, there may be undesignated historic assets that could be affected by the proposed development and, if you have not already done so, we would advise that you consult the Historic Environment Record held by the Dyfed Archaeological Trust (DAT).</p>	
LQAS	21 st September 2020	Formal notification of draft application publication issued by email	<p>Response received on 23rd October 2020.</p> <p>Advice: Having considered this proposal in light of the Welsh Government's</p>	Wessex Solar Energy responded by issuing a letter via email to LQAS on 27 th October 2020 providing further detail and clarification regarding each of the concerns raised as detailed below.

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
			<p>Planning Policy Wales provision for the protection of BMV agricultural land (paragraphs 3.54 & 3.55); and, TAN 6 (Chapter 6 & Annex B), the Department for Environment, Energy & Rural Affairs advises the applicant that, it would object to an application for planning permission made in the same or substantially the same terms. This is in the long term national agricultural interest for the following reasons:</p> <ol style="list-style-type: none"> 1. The potential loss of 30.50ha of confirmed BMV agricultural land is a matter of national significance. 2. It is considered that the proposal has failed to give considerable weight to protecting BMV agricultural land because of its special importance. 	<ol style="list-style-type: none"> 1. The potential loss of 30.50ha of confirmed BMV agricultural land is a matter of national significance. <p>We would like to clarify that the proposed development will only include the use of 20.75ha of Grade 2 land and 7ha of Grade 3b land, giving a total of 27.75ha of BMV agricultural land. This is detailed within Appendix A5.2 (Agricultural Assessment Report). The figure of 30.50 ha quoted relates to the areas stated within the ALC Report (Appendix A5.1). During the refinement of the site designs, an area of Grade 2 land was removed from the initial development boundary.</p> <p>We understand the desire to avoid the loss of BMV agricultural land and the policy support which this benefits from. However, we would ask that you please consider the additional information below which we feel demonstrates that the current proposals would not result in a nationally significant loss of BMV agricultural land.</p> <p>The proposed development includes the use of 27.75ha of BMV agricultural land. With reference to Predictive Agricultural Land Classification ALC Map¹ and the</p>

¹ <https://lle.gov.wales/catalogue/item/PredictiveAgriculturalLandClassificationALCMap/?lang=en>

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			<p>3. The Department views the search area as insufficient and, therefore, arguments of overriding need and possible alternative sites are not credible.</p> <p>4. No evidence has been presented to demonstrate that once developed, its return to agriculture as best and most versatile agricultural land is practicable.</p>	<p>application of GIS software, the total area of BMV agricultural land in Wales can be calculated to be 354,426 ha. The BMV within the proposed site boundary is therefore equal to approximately 0.0078% of all BMV land in Wales.</p> <p>Furthermore, we would maintain that the land would not be lost, simply used for an alternative type of farming. The proposed development will allow the ongoing agricultural use of the land using regenerative farming techniques.</p> <p><i>“Regenerative Agriculture is a system of farming principles and practices that increases biodiversity, enriches soils, improves watersheds and embraces ecosystem services. It aims to capture carbon in soil and aboveground biomass, reversing current global trends of atmospheric accumulation. At the same time it offers increases in yields, resilience to climate instability and higher health and vitality for farming and ranching communities. The system draws on decades of scientific and applied research by the global communities of organic farming, agroecology, holistic management and agroforestry.”²</i></p>

² www.regenerativeagriculturedefinition.com

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				<p>The proposed solar park development will result in a shift away from intensive arable farming to pasture. Over time this will serve to improve the growing medium, increasing the opportunity for organic matter to coat the mineral particles within the soil, stimulating water holding capacity, and allowing mycorrhizal fungi and bacteria to redevelop within the soil. Such soils are able to store carbon in a way that contemporary, inorganically fertilised and regularly cultivated soils have ceased to be able to do.</p> <p>Furthermore, as set out within the Landscape and Ecological Management Plan (Appendix A9.4), the use of fertilisers and pesticides will cease across the majority of the site, except for use in encouraging the initial growth of newly planted trees, hedgerows and meadow grassland areas.</p> <p>During the 40 year operational lifetime of the proposed solar park the land will serve the dual purpose of agriculture and generating electricity from renewable energy. Indeed, it will provide a material contribution towards meeting renewable energy targets in Wales, while meeting 0.21% of Welsh electricity demand and helping the UK to achieve its net zero target.</p>

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				<p>At the end of the it's lifetime, all electrical apparatus will be removed and the land returned to mixed agricultural use (subject to the chosen form of agricultural at the time).</p> <p>The 40 year period of regenerative agriculture is anticipated to coincide with the optimum period of repair, as projected by Isabella Tree in her book about the rewilding of the Knepp Estate, Sussex.³</p> <p>In conclusion, the soil and land use quality will not be negatively affected by the proposed development. The land will not only remain in agricultural use during the operational lifetime of the solar park but can be rapidly returned to more intensive arable farming once the site is decommissioned. As such, no BMV agricultural land will be lost.</p> <p>2. It is considered that the proposal has failed to give considerable weight to protecting BMV agricultural land because of its special importance.</p>

³ “Wilding – The return of Nature to a British Farm” Picador 2018.

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				<p>As set out in the Alternative Sites Assessment (ES Vol1 Chapter 5), in undertaking our site searches, Wessex made efforts to secure land of lower ALC grades. The site itself was identified as being in an area of Grades 3 and 4 land, as was the vast majority of the search area. It was only after the grid connection capacity had been secured and detailed studies were undertaken that the land was identified to be of a mixture of Grades 2, 3a and 3b. Once this information was known, consideration was given to securing alternative sites. However, at this point no other sites were available with spare capacity on the electricity network. Wessex did, however, refine the site to remove some land that was exclusively Grade 2.</p> <p>Given this, the size of the site, the area of BMV land involved (0.0078% of BMV land in Wales), the retention of the land for agricultural use and the potential for improvement of the quality still further during operation, we would suggest that considerable weight has been given to this asset within our application. The proposed solar park will protect the land from ongoing intensive farming practices, including treatment with fertiliser and pesticides, which could reduce the quality of it in the longer term. As detailed in Appendix A5.2, the proposal does not involve the irreversible development or damage of any BMV agricultural land and it will therefore be</p>

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				<p>conserved as a finite resource for the future. In policy terms, the proposed development will contribute to the resilience, diversification and future viability of the farming business and therefore complies with LDP Policy GN.10 and PPW10.</p> <p>3. The Department views the search area as insufficient and, therefore, arguments of overriding need and possible alternative sites are not credible.</p> <p>As detailed within the Alternative Sites Assessment, there is no formal guidance as to what represents a suitable search area for an alternative sites assessment. Wessex has developed, and continues to develop, solar farm projects across England and Wales. We selected Pembrokeshire – which makes up approximately 8% of the land in Wales – as an appropriate search area on the basis that all local authorities will have to do their bit to assist in meeting the UK's net zero target.</p> <p>As also noted in the Alternative Sites Assessment, since it was identified that the development site was not, as previously thought, made up of Grade 3 and 4 land, but instead Grades 2, 3a and 3b, it became clear that an already congested electricity network had become even</p>

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				<p>more constrained. As such, Wessex has not been able to identify any alternative sites in the entire South Wales region for development. Attached are two extracts from Western Power Distribution’s Network Capacity Map. These show those substations with 22MW (and separately 15MW) of available capacity for electricity generation in South Wales. This indicates a small number of substations in urban Cardiff and Swansea (where there is not sufficient, suitable land), as well as Merthyr Tydfil, where Wessex has been unable to identify a suitable site on other technical and commercial grounds.</p> <p>We would also highlight that, even if Wessex was able to find an alternative site, the need for renewable energy would not cease. It is estimated that as much as 40,000MW of solar energy generation will need to be developed for the UK to meet its net zero target, with only of the order of 12,000MW installed in the last 10 years.</p> <p>4. No evidence has been presented to demonstrate that once developed, its return to agriculture as best and most versatile agricultural land is practicable.</p> <p>As detailed within the Landscape and Ecological Management Plan (Appendix A9.4) during operation of the</p>

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				<p>solar park site the land will be grazed and largely maintained as grassland and wildflower meadow. Neither of these uses prevent the return to BMV land. In addition, at the end of the operational lifetime of the solar park, all electrical apparatus will be removed from site. Foundations and on site access roads will be removed and the land returned to agricultural use. There is no element of the solar park development which would prevent this from taking place. As detailed above due to the application of regenerative farming practices (inherent within the management of the site throughout the operation of the solar park) the land is likely to experience a period of rejuvenation and be of better agricultural quality upon decommissioning than it is currently.</p> <p>The site area has been significantly reduced and therefore contains significantly less BMV agricultural land.</p>
LQAS	26 th October 2020	Further information sent via email in response to initial objection	<p>Response received 13th November 2020:</p> <p>The Department has considered the additional information provided, relating to each of the concerns raised in our response dated 23rd October 2020. I can confirm that the Department</p>	<p>In response to these additional comments, a detailed Land Quality Implications Assessment (Document Reference BL014) and Outline Decommissioning and Restoration Plan (Document Reference BL013) have been prepared for consideration as part of the formal consultation process following the submission of the application to PINS Wales. These documents have been issued to LQAS for their information.</p>

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			<p>maintains its position (as per consultation response dated 23rd October 2020) and that it would object to an application for planning permission made in the same or substantially the same terms.</p> <p>The Department does not accept any of the arguments put forward; however, it wishes to specifically raise the following:</p> <p>1. Thank you for the clarification regarding that the proposed development would involve the loss of 27.75ha of BMV agricultural land (not 30.50ha), as detailed within Appendix A5.2 (Agricultural Assessment Report).</p> <p>The Department considers the case made over the national significance of BMV loss as incorrect. A loss of 20 hectares or more is set in statute and technical advice as the point where the loss</p>	<p>The site area has been significantly reduced and therefore contains significantly less BMV agricultural land.</p>

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			<p>becomes an issue of national importance.</p> <p>2. Planning Policy Wales (para 3.54) requires BMV agricultural land to be conserved as a finite resource of special importance. Considerable weight must be given to protecting it from development. It is acknowledged in TAN6 (6.2.2) that ‘...<i>once agricultural land is developed, even for ‘soft’ uses such as golf courses, its return to agriculture as best and most versatile agricultural land is seldom practicable</i>’. Sufficient evidence has not been provided to the Department to demonstrate that considerable weight has been given to protecting BMV agricultural land because of its special importance. The Department does not consider there to be sufficient detail of soil handling, storage and reinstatement, nor is there a</p>	

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			<p>detailed decommissioning plan supporting the proposal. The level of accompanying infrastructure presents a long term risk to both the land quality and use from disturbance / uncertainty over decommissioning.</p> <p>3. To assist developers in meeting BMV Policy requirements, the Department has produced the 'Predictive Agricultural Land Classification (ALC) Map for Wales (Version 1 in 2017 and Version 2 in 2019)'. The map enables developers make informed decisions regarding agricultural land quality and application of BMV Policy at an early stage in development of proposals. Lower grade agricultural land is available, therefore we are of the opinion that arguments of overriding need are not credible.</p>	

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			<p>In addition, references to ALC grades 3 and 4 appear to be derived from the Provisional ALC Map. TAN6, Chapter 6.2.4 states, <i>“The Agricultural Land Classification (ALC) map for Wales is published at a scale of 1:250,000. This map is produced for use in strategic planning and provides only a generalised indication of the distribution of land quality. The map is not suitable for use in evaluating individual sites. In such cases a resurvey at a larger scale is necessary to obtain a definitive grade”</i>. This should have been taken into account in the site selection process. The indication of Provisional ALC grade 3 should indicate the possibility of BMV land being present through the sub-grading of 3a and 3b.</p> <p>4. The Department does not agree with the statements related to threat posed by <i>“intensive”</i></p>	

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			agriculture, remaining “ <i>in agricultural use</i> ” and “ <i>regenerative farming practices</i> ”; these are erroneous. The Basic Payment Scheme does not allow solar sites to claim agricultural financial support because the land use is primarily for energy generation and not agriculture. The change of use to energy generation means the land could not be farmed to its BMV potential.	
LQAS	1 st December 2020	Additional documents sent via email in response to outstanding objection	<p>Response received 9th December 2020:</p> <p>The Department does not consider these to address Planning Policy Wales.</p> <p>The Department maintains its position that, it would object to an application for planning permission made in the same or substantially</p>	<p>No Further Action Taken.</p> <p>The site area has been significantly reduced and therefore contains significantly less BMV agricultural land.</p>

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			the same terms. This is in the long term national agricultural interest.	
Pembrokeshire County Council	21 st September 2020	Formal notification of draft application publication issued by email	Response received on 21 st October 2020: Pembrokeshire Council Local Planning Authority (LPA) is not a specialist consultee for the purposes of The Developments of National Significance (Procedure) (Wales) Order 2016 (Article 9). You are in receipt of the LPA's pre-application advice of 5 th March 2020 (Ref. NS/0442/19) that was provided in accordance with The Developments of National Significance (Wales) Regulations 2016 (Regulation 7). As you are aware there has since been continued engagement on certain aspects of the proposed development.	No Action Required
Coal Authority	21 st September 2020	Formal notification of draft application	Response Received on 25 th September 2020: I have reviewed the development site boundary and can confirm that	No Action Required.

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		publication issued by email	the site does not fall within the defined coalfield therefore we have no specific comments to make.	Additional pre-application consultation has been undertaken with Pembrokeshire County Council in relation to the reduced site area.
The Health and Safety Executive	21 st September 2020	Formal notification of draft application publication issued by email	<p>Response Received on 14th October 2020:</p> <p><u>HSE's Land Use Planning Advice</u></p> <p><u>Will the proposed development fall within any of HSE's consultation distances?</u></p> <p>With reference to DNS Site Location (Reference: DNS-3245065-000026-Figure 1.1 Site Location PDF), the proposed project/development does not currently fall within the consultation distances of any Major Hazard Installation(s) or Major Accident Hazard Pipeline(s).</p> <p>Please note that, if prior to the granting of a development consent</p>	<p>No Action Required.</p> <p>Wessex Solar Energy can confirm that no Hazardous Substances Consent is not required under the Planning (Hazardous Substances) Act 1990 as amended.</p> <p>No Change</p>

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			<p>order for this proposed development Hazardous Substances Consent is granted for a Major Hazard Installation or there is notification of a Major Accident Hazard Pipeline within or in the vicinity of the development, HSE reserves the right to revise its advice.</p> <p><u>Would Hazardous Substances Consent be needed?</u></p> <p>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</p>	

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			<p>(Hazardous Substances) (Wales) Regulations 2015.</p> <p>Hazardous Substances Consent would be required if the 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.</p> <p>Further information on HSC should be sought from the relevant Hazardous Substances Authority.</p> <p><u>Explosives sites</u></p> <p>There are no licensed explosive sites in the vicinity so HSE has no comment to make in this regard.</p>	
Local Highways Authority	21 st September 2020	Formal notification of draft application	Response received on 6 th October 2020:	1. The requirement for a pre-construction joint condition survey has been included within the Draft Construction Traffic Management Plan and it is expected that this

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		publication issued by email	The access road chosen is an Unclassified Road although was a Byway till just a handful of years ago. It became unsuitable for the traffic use to the Lower Nash Farm Shop, by the Church, and was patched and surfaced with a wearing course to make it suitable to be on the Unclassified Road register. I think that the Trunk Road Highway Authority may chose it as the preferable means of access to the development, and you need to continue to consult the Transportation section at the Cardiff Welsh Assembly. There is a long passing area close to the junction with the TRA477, and the location and visibility appears better. Blackberry Lane, however, is narrow throughout, with very few passing places, although it does link through to the Class 3 Road (Cosheston to Milton), close to Upton Castle Gardens, even if it is not signposted for anything in	<p>would be conditioned as part of any subsequent approval.</p> <p>2. Blackberry Lane will not be used to access the site at any time. We acknowledge the proposed condition which would require the Blackberry Lane access to be blocked up during the construction, operational and decommissioning phases of the proposed development as requested but we would request the inclusion within the condition of wording which would allow the gate access to be reinstated as part of the decommissioning of the solar park so that it is available for use by the farmer once the land is returned to sole agriculture use.</p> <p>3. Noted.</p> <p>4. This requirement has been included within the Draft Construction Traffic Management Plan.</p> <p>Additional measures have been include within the Draft CTMP and are detailed in Table 3.</p>

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			<p>either direction as a discouragement to use.</p> <p>The draft Construction Traffic management Plan and associated appendixes are noted (including the “dilapidation” survey, plan of site compound, parking and laydown areas, and the swept paths of low loaders). I have the following comments to make:-</p> <ol style="list-style-type: none"> 1. It is standard practice to have joint walking Road Condition Survey, after Planning Consent, but before commencement of works on site. The document produced so far can be followed through and amended as agreed at this meeting. There will of course need to be a road inspection at completion 2. If there is any access intended onto Blackberry Lane, either during 	

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			<p>construction, or for operational reasons or maintenance, then this lane needs to be surveyed, with the inevitable construction of new passing places. Otherwise, for the avoidance of doubt, there will be planning conditions recommended that the field access into the site is permanently stopped up and the hedgebanks closed up prior to commencement.</p> <p>3. The plans show significant enough widening of the field access into the site that will need to be covered by License under Section 184 of Highways Act 1980. Our Streetcare section deals with this after Planning consent.</p> <p>4. The lane used for access is generally only single track, so the need for a</p>	

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			“banksmen”, at <u>both</u> the Trunk Road junction and the site entrance, is considered necessary so as to ensure that the larger vehicles do not meet one another. This will add to safety at the Trunk Road junction and help with safe passage of non-construction traffic.	
Dyfed Archaeological Trust (DAT)	21 st September 2020	Formal notification of draft application publication issued by email	<p>Response received 5th October 2020:</p> <p>We have now reviewed the draft report prepared by Red River Archaeology (project code: RRP520, June 2020) on the results of the archaeological trenching works, which broadly confirmed the findings of the geophysics survey undertaken in 2013 and indicates the presence of possible prehistoric (Neolithic</p>	<p>A copy of the Settings Impact Assessment (Appendix A10.4) issued to DAT for consideration on 5th October 2020.</p> <p>No Change</p>

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			<p>and Bronze Age) features considered to be of potential regional importance. Preservation <i>in situ</i> is always our preferred position and we are in favour of the suggested plan to exclude the areas of archaeological significance from the development. We have previously sought confirmation that these areas will be fenced off during construction, using non-intrusive fencing, and that a buffer of at least 10m will be left from the known archaeological deposits and we understand that this has been agreed. Fencing can be removed once the site is established to allow for grazing and reinstated, if necessary, should significant works be required near these sites during operation.</p> <p>We therefore consider that direct impact of the development on</p>	

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			archaeological deposits has been adequately mitigated. However, we've yet to see that the potential visual impact on the historic environment has been fully addressed. As we commented on 16 th July, it is usual practice to see both direct impact on archaeological deposits and visual impact on the setting of historic assets assessed within a DBA but we understand that the settings impact assessment will be presented in a separate report.. We understand from yourself that a site walkover and field visit have both been completed and a settings impact assessment has been prepared and so we await to see the results of these in due course.	
Dyfed Archaeological Trust (DAT)	5 th October 2020	A copy of the Settings Impact Assessment (Appendix A10.4)	Response received 6 th November 2020:	No Action Required. No Change

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		issued to DAT for consideration.	<p>In our previous comments (05th October) we considered that direct impact of the development on archaeological deposits has been adequately mitigated but had not yet seen an assessment of the potential visual impact on the historic environment. We note that the Settings Impact Assessment, prepared by Orion Heritage Ltd (June 2020, updated August 2020) concludes that only one designated historic asset which may be subject to an adverse effect and this impact will be mitigated through hedgerow screening.</p> <p>We are therefore satisfied that the potential visual impact of the development on the historic environment has also been sufficiently addressed.</p>	
Dwr Cymru / Welsh Water	26 th October 2020	Formal notification of	Request received on 6 th November for standalone copies of plans.	Requested plans issued on 6 th November 2020. Follow up email sent on 12 th November 2020.

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		draft application publication issued by email	Email acknowledgement of plans received 12 th November 2020. No further comments received.	No further action taken. No Change
Pembrokeshire Coast National Park Authority	21 st September 2020	Formal notification of draft application publication issued by email	No written response received. Verbal confirmation via telephone conversation that the PCNPA that do not have any significant concerns regarding the proposed development and the potential impacts upon the PCNP, and would not like to raise any objections at this stage.	No Action Required. Some of the fields partially visible from the National Park have been removed from the site boundary.
Pembrokeshire Coast National Park Authority	27 th November 2020	Amended planting scheme, photomontages and information regarding viewpoint 1 issued via email	No response received	No Action Required. No Change

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Natural Resources Wales	21 st September 2020	Formal notification of draft application publication issued by email	<p>Response received 6th November 2020. A summary is provided below.</p> <p>Requirement: Submission of an amended Landscape Management Plan / Landscape Mitigation Plan, which addresses the matters highlighted in this letter.</p> <p>Requirement: Submission of an amended version of the '<i>Code of Construction Practice, incorporating: Part 1 - General Environmental Management Plan / Part 2 (Ref: BL009).</i>'</p>	<p>The LEMP has been amended accordingly</p> <p>The CoCP and CEMP amended accordingly</p> <p>No Change although some comments are addressed by the reduction in the site area.</p>
			<p>Landscape</p> <p>The Pembrokeshire Coast National Park (PCNP) lies approximately 120-metres to the north of the site, while the site itself lies within the setting of the National Park. We note that the proposal is for a large-scale solar</p>	

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			<p>farm of approximately 34.25 hectares.</p> <p>The proposal is a large-scale infrastructure development in the setting of the National Park and would be prominent from some views within the park and looking towards the park.</p> <p>We consider that there would be some significant adverse effects which would detract from the natural beauty of the National Park.</p> <p>Therefore, we currently have significant concerns regarding the likely adverse visual impact in views from the National Park, including from Viewpoints 4 and 7, identified in the LVIA.</p> <p>We consider that visual impacts are likely to be long-term and significant and as such require that further mitigation, in the form of planted buffers to the northern boundaries and within</p>	<p>The proposed planting scheme has been amended to include additional screen planting as follows:</p> <ul style="list-style-type: none"> • Additional tree planting along the northern boundary of the two easternmost fields; • Additional tree planting along the newly proposed hedgerow in the easternmost field

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			<p>the site, to minimise these impacts on the National Park.</p> <p>Additional mitigation would also reduce the impacts in views towards the park (Viewpoints 1 and 5) from within its setting and assist in limiting the cumulative impacts of views of solar farms and other infrastructure from the park.</p> <p>Therefore, we advise that full details of the additional mitigation are provided, along with confirmation of how this will address the visual impact identified above and the submission of an amended Landscape Management Plan / Landscape Mitigation Plan / Landscape Masterplan.</p>	<ul style="list-style-type: none"> A new hedgerow and tree line across the centre of the central field. <p>This additional planting has been incorporated into the photomontages for viewpoints 4 and 7.</p> <p>The LVIA has been updated to include consideration of the benefits of this planting.</p> <p>The Landscape Management Plan, Mitigation Plan and Masterplan have been updated accordingly.</p> <p>No Change although some comments are addressed by the reduction in the site area.</p>
			<p>In addition to the solar panels, the proposal includes 2 km of stoned access tracks, 22 inverter cabins</p>	<p>The scheme has been amended to include only 12 inverter cabins which are only slightly larger in size and are no taller. The LVIA has been updated accordingly.</p>

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			and 1 control building, all of which would add to the visual impact.	The site is now reduced in size with a shorter access track and fewer and other components.
			<u>Landscape Character</u> The site lies within LCA25 Hundleston & Lamphey as defined in the Draft Pembrokeshire County Council Landscape Character Assessment. The LVIA considers the potential effects on this Landscape Character Area to be Moderate/Minor adverse in the vicinity of the site and Minor adverse in the wider LCA. We suggest that the effects on the site and immediate locality are more likely to be at least Moderate adverse and significant, given the scale of the development and change in character from pasture land to infrastructure.	No action taken. This point represents a minor disagreement regarding nonsignificant effects. This LVIA concludes that effects would be greatest in the immediate vicinity of the site and that effects would be Moderate-Moderate/Minor and not significant (see paragraph 474 in ES Volume 1 DRN BL001). Reduced site area reduces this potential impact.
			The site also lies close to LCA28 Daugleddau as defined in the National Park's Landscape Character Assessment. Although	

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			<p>within the National Park, this area is considered of High/Medium sensitivity (due to its enclosed nature with woodland and hedgerows). The LVIA considers the potential effects on this LCA to be Moderate or Moderate/Minor adverse and not significant. We consider that the effects on the landscape character of the park are unlikely to be significant.</p>	<p>No Action Required.</p> <p>Reduced site area reduces this potential impact.</p>
			<p><u>Visual Effects</u> Visual effects are principally experienced from the south east of Cosheston and from minor roads and public footpaths to the north and north east within the National Park. The proposal would be prominent from Viewpoints 4 and 7 within the park and Viewpoints 1 and 5 looking towards the park. With reference to the photomontages, we consider that significant adverse effects (Major/Moderate) would remain at</p>	<p>As per the methodology and explained in Appendix 8.4, we do not assign a significance level to a single viewpoint, but assess effects on receptors i.e. people moving through the landscape.</p> <p>Taking into account extent and duration of effect, the LVIA identifies Moderate levels of effect on receptors groups represented by viewpoints 1, 4 and 7. Further explanation</p>

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			<p>Viewpoints 4 and 7 after 10 years. No photomontages have been provided from Viewpoints 1 and 5. However, we consider that the effects from Viewpoint 1 are likely to remain significant, whereas from Viewpoint 5, potentially not significant.</p> <p>We would also wish to take the opportunity to highlight that within Appendix 4, the Viewpoint Analysis states that the development is not visible from Viewpoint 7, however it is clearly visible, as shown in the photomontage.</p> <p>Furthermore, we wish to highlight that Chapter 8 of the ES (paragraph 493) states that the magnitude and significance of effects would not markedly reduce over time due to the elevation of areas overlooking the site from the National Park.</p>	<p>as to why this is not considered significant is provided where relevant within ES Volume 1 Section 8.8.</p> <p>Viewpoint 1 shows a view across a field gate. The photoview has been used to provide a worst case view. However, it should be noted that this view was taken on private land, with the road and footpath route are located further back from the gate. Photographs provided in Appendix A8.6 provide a more realistic indication of the view from the road and footpath and show that the significance of the views from these public areas is considerably reduced from that which has been assessed initially.</p> <p>The additional planting proposed as shown within the revised photomontages will reduce any potential impacts from viewpoint 4 and 7.</p> <p>No action taken. We note that NRW do not disagree with the assessment of effects on the National Park. The proposed development is located outside, but close to the National Park boundary and the LVIA has regard to the requirement that NRW highlight by considering the effects</p>

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			<p>With regard to the effects on the National Park Purposes and Special Qualities the LVIA considers the effects to be Moderate/Minor adverse and not significant. The requirement to have regard to the purpose to conserve and the enhance natural beauty applies to development within the setting, as well as within the National Park.</p> <p>We consider that there would be some significant adverse visual effects on the National Park in the long-term and a significant adverse effect on the landscape character of this part of its visual setting.</p> <p>ES Chapter 8 (paragraph 472) states that tranquillity would not be affected. However, we consider that there would be some adverse effects on the sense of remoteness, tranquillity and wildness through the addition of</p>	<p>on the special qualities of the National Park in ES Volume 1 Section 8.8.5.</p> <p>Some comments are addressed by the reduction in the site area.</p> <p>Clarification has been provided within the assessment of landscape effects. It is also noted that the LVIA identifies small scale effects on the 'Remoteness, tranquillity and wildness' special quality of the National Park – full assessment is located in ES Volume 1: Section 8.8.5.</p> <p>No Change</p>

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			<p>infrastructure into the view and cumulative effect of views of solar farms from this part of the park. In our opinion, these adverse effects would detract from the natural beauty of the park.</p> <p><u>Cumulative effects</u> There are two existing solar farms to the north-west (West Farm) and south-west (Golden Hill) of the site, in addition to the proposal. Figure 8.8 (Cumulative ZTV) indicates areas within the National Park where all three solar farms would be visible, mainly around Viewpoint 7. Each solar farm would potentially also be visible individually over areas within this part of the park near Cosheston when travelling through the park. A larger area of the National Park would be affected by views of solar farms cumulatively than by each one individually, therefore</p>	<p>For clarity, further detail has been added to the cumulative assessment in Section 8.10 in relation to the visual effects of the two existing solar farms and the Proposed Development from the National Park.</p> <p>No Change</p>

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			there would be an incremental adverse effect.	
			<p>We also note the findings of the Glint and Glare Assessment (Blackberry Lane Solar Park: Non-EIA Technical Assessments - Appendix A), which indicate limited locations (10), including Viewpoint 1, where glint and glare from the solar panels would be experienced and over a limited time period. However, we do not consider these effects are likely to be significant.</p> <p>Pollution Prevention We welcome the submission of the document titled; '<i>Blackberry Lane Solar Park: Code of Construction Practice, incorporating: Part 1 - General Environmental Management Plan / Part 2 - Construction Environmental Management Plan (Ref: BL009)</i>', dated September 2020, by Wessex Solar Energy.</p>	<p>No Action Required. No Change</p> <p>No Action Required No Change</p>

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			<p>Having reviewed the document we are satisfied that it appears to be sufficiently comprehensive and site-specific to afford an adequate level of protection and pollution prevention. We note that key components (<i>such as buffers, silt fencing, topsoil stripping of minimal areas, spillage procedures, etc</i>) have been addressed within the document. Section 6.5 (Appendix C) makes reference to notifying the Environment Agency (EA) and provides their emergency number. Therefore, we advise that his should be corrected to reference Natural Resources Wales (NRW), as well as providing NRW's emergency number, which is 03000 65 3000. We note that the correct number is quoted later in Appendix F.</p>	<p>The CoCP and CEMP have been amended. No Change</p>
			Geoscience	No Action Required

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
			<p>The site is located on karstic Carboniferous Limestone which has been designated as a Principal Aquifer, able to support large abstraction for public water supply. The site is also located within a Source Protection Zone 1 (SPZ1) for a public water supply at Milton.</p> <p>As part of our response to the screening and scoping direction we questioned the use of fluid filled cables at the site. Having reviewed the Environmental Statement (ES), we note that paragraph 1002 (page 240), confirms that; <i>'no fluid filled cables with be installed on site and there are no known existing fluid filled cables with cross the site.'</i></p> <p>Given this confirmation, we have no further comment to make on this aspect of the proposed development.</p>	No Change

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
			<p>We are satisfied that the pollution prevention measures detailed within the Code of Construction Practice are in line with best practice and guidance. Therefore, as the development is located within a Source Protection Zone 1, we would advise the implementation of the pollution prevention measures laid down in that document, to safeguard groundwater.</p> <p>European Protected Species We note from Chapter 9 (paragraph 524), that an Extended Phase 1 Habitat Survey, of the site took place on the 24 June 2019. We also note from Chapter 9 (paragraph 525), that in addition to the original desktop survey, which was undertaken in June 2019, a further review was carried out in June 2020.</p>	<p>No Action Required No Change</p>

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
			<p>In our screening and scoping responses, we requested further information and clarification in relation to a number of protected species and ecological matters. Therefore, we welcome the details provided in Chapter 9.3.2 (Table 9-1), which provides a summary of consultee responses and the proposed actions to the matters raised by NRW.</p> <p>Bats</p> <p>We previously noted that some of the boundary trees <i>contained features that would be considered suitable for use by roosting bats</i>. However, it was unclear whether any of the trees with potential roosting features (PRF's) would be impacted by the development. Therefore, we welcome the confirmation within Table 9-1 (page 134), that all trees will be maintained within the development and no works will be undertaken with the root protection area (RPA)</p>	

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			<p>of any trees on, or adjacent to the site. We also note that no additional lighting will be required during the construction, operational or decommissioning phase of the proposed solar park development.</p> <p>Dormouse</p> <p>Previously we noted that the Preliminary Ecological Appraisal had identified that while the hedgerows on the site were deemed to be of low to moderate quality, they did contain hazel and honeysuckle and were described as having good links to adjacent woodland and hedgerows habitat, which had the potential to support dormouse.</p> <p>Although the desk study did not return any records of dormouse within 3 km of the site, the potential to support dormouse, was indicated in the ecological appraisal. Therefore, we welcome the confirmation provided in Table</p>	

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			<p>9-1 and Section 9.6, that all hedgerows will be retained within the development, along with a minimum stand-off distance of 5-metres from the centre line of all hedgerows.</p> <p>We also welcome the intension to enhance retained hedgerows at the development site through the infilling of gaps with native planting and an additional 350-metres of new hedgerow planting. We also note that the hedgerows will be managed for wildlife, including dormouse, and cut on rotation.</p> <p>We also welcome the confirmation that no additional lighting will be required during the construction, operational or decommissioning phase of the proposed solar park development.</p> <p>Other Protected Species Badger As part of our screening/scoping response, we noted that the</p>	

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
			<p>Preliminary Ecological Appraisal identifies field signs of badger including: tracks snuffle holes and push throughs at fence lines, occasionally throughout the site, along with the presence of a well-used track through a hedgerow at the south site of the site. It is stated that no evidence of setts have been identified within the site, although it is considered likely that the site is used by badger for foraging and commuting.</p> <p>We note that Table 9-1 indicates that a badger survey will be undertaken immediately prior to works commencing in order to determine how the site is being used by the species at that time. It is also stated that should any setts be identified then a method statement will be prepared and a licence applied for.</p> <p>As previously stated, badgers and their setts are protected under the Protection of Badgers Act 1992. It</p>	

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			<p>is an offence to kill, injure or take any badger or to disturb a badger whilst it occupies a sett. It is also an offence to damage, destroy or obstruct access to a badger sett. If development is to take place within 30m of a badger sett then a licence may be required under Section 10 (d) of the Protection of Badgers Act 1992, before any development can proceed.</p> <p>We also welcome the additional proposals listed in Table 9-1 and Chapter 9.6 to include '<i>badger gaps</i>' every 50-meters in the fencing to ensure that badgers (and other small mammals), can continue to access the site for foraging and commuting. We also support the implementation of best practice measures during the construction phase, in relation to excavations, trenches, pits or open pipe systems to safeguard badgers and other small mammals.</p>	

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
			Mitigation, Compensation and Enhancement Measures We welcome the measures which have been proposed in ES Chapter 9.6 and in the separate document titled; ' <i>Blackberry Lane Solar Park: Landscape and Ecological Management Plan (Ref: BI012)</i> ', dated August 2020, by Wessex Solar Energy Ltd.	
Natural Resources Wales	27 th November 2020	Amended planting scheme, photomontages and information regarding viewpoint 1 issued via email	No response received	No Action Required No Change
PINS Wales	6 th October 2020	Provision of draft application documentation as part of a formal pre-application advice request	Response received 28 th October 2020. A summary of points which resulted in changes to documents is provided below: <u>Plans</u>	

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			<p>It is noted that the site location plan is incorporated at figure 1.1 of the ES, but in the interests of clarity a standalone site location plan should be produced so that it can be viewed without the need to refer to the ES.</p> <p><u>DAS</u> Section 4.1 of the DAS refers to ‘...provisions for disabled access for any disabled workers that will be accommodated in the project design’ but does not specify what those provisions are. Further details should be included in order for the DAS to fully address the issue of inclusive access.</p>	<p>This is provided as Plan A within the application documentation. No Change</p> <p>Additional information has been included within Section 4.1 of the DAS (DRN BL008). No Change</p>
			<p><u>The Consultation Report</u> It was identified during the preparation of this advice that the Applicant had not notified one of the specialist consultees (the Water and Sewerage Undertaker). An Officer from the Inspectorate</p>	<p>Dwr Cymru / Welsh Water were consulted on 26th October 2020 with a consultation deadline of 7th December 2020. No Change</p>

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
			<p>contacted the Applicant and agreed that notice should be served as soon as possible, and that the specialist consultee should be given a full 42 days to respond if required. The response should be incorporated into the final Consultation Report (CR) along with any others received (as indicated at paragraph 38 of the draft CR).</p> <p>Article 8(1)(a)(iii) of the DNS Procedure Order requires the applicant to publish a notice in a newspaper circulating in the locality of the application site. The CR must then contain a declaration that publication was carried out and include a copy of the newspaper advert. These have been omitted from the draft CR and should therefore be included in the final version.</p>	<p>A declarations section: Section 2.7 has been added to this report. No Change</p>

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
			<p>Article 11(2)(c) requires that the CR include a list of the addresses of the persons who were given notice of the proposed application in accordance with article 8(1)(a)(ii) and a copy of the notice given to such persons. Although a copy of the notice is included, the list of addresses is not and should therefore be incorporated into the final version of the CR.</p> <p>Details of the site notice required by article 8(1)(a)(i) are included in the draft CR but a clear declaration that the requirements of that article have been met should be included in the final version. The applicant may wish to consider setting out the required declarations under a specific heading, in the interests of clarity.</p> <p><u>Planning Statement</u> The submission of a Planning Statement (PS) is considered a</p>	<p>A list of addresses has been added to Section 2.7.2 of this report. No Change</p> <p>A declarations section: Section 2.7 has been added to this report. No Change</p>

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
			<p>pragmatic way of addressing the relevant planning policy issues as part of the application. However, the draft version of the PS includes reference to the National Planning Policy Framework and National Policy Statements, neither of which are applicable to schemes in Wales that fall under the DNS process.</p> <p>The applicant's attention is also drawn to the emerging Future Wales: The National Plan 2040, which is expected to be adopted in the early part of 2021 and which will then form part of the development plan applicable to DNS applications. It is recommended that the applicant seek to address Future Wales in the PS, as it will likely be part of the relevant policy framework at the time of application and information on schemes' compliance with it has already been sought by Inspectors as part</p>	<p>Reference to the NPPF and NPS has been removed from the Planning Statement (DRN BL006). Additional information has been included regarding The National Plan 2040.</p> <p>No Change</p>

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
			<p>of ongoing DNS examinations. An example can be viewed here.</p> <p><u>Environmental Statement</u> The Site Boundary and indicative layout are shown at Figures 1.2 and 1.2B. 1.2B has been prepared using a non-standard scale. This is useful for understanding the Site context. However, at this scale and A3 size, combined with the use of similar colours to identify specific elements, the plan is difficult to read. The applicant should consider splitting the layout provided at Figure 1.2B into different plans (should the A3 format be maintained).</p> <p>Chapter 16 outlines the potential effects of the Grid Connection which will be the responsibility of Western Power Distribution. The high-level assessment is</p>	<p>A revised Figure 1.2B has been included within the application which splits the site across 2 A3 pages. Figure 1.2B is no longer provided due to the reduced site area.</p>

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			<p>understandable due to the lack of details at this stage. It is recognised that, once completed, the underground Grid connection is unlikely to generate any significant impacts and is not considered likely to give rise to a combined effect with the Proposed Development. However, it is noted that the construction of the Grid Connection is considered in isolation. It is not clear whether the construction of the Grid Connection will be concurrent with, or subsequent to, the main project. The ES does not therefore provide enough information to exclude potential combined effects with the Proposed Development.</p> <p>A Landscape and Visual Impact Assessment (LVIA) is provided at Chapter 8. It is noted that Appendix 8.1 illustrates the methodology used in line with the Guidelines for Landscape and</p>	<p>Consideration of potential cumulative effects of the grid connection works with the Proposed Development has been included in ES Vol 1; Chapter 16; Section 16.8.4.</p> <p>No Change</p>

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
			<p>Visual Impact Assessment (GLVIA3). The methodology is also summarised at Chapter 8 section 5. Chapter 8, Section 6 describes the baseline in terms of visual and landscape receptors. However, it appears there is no discussion of future baselines, diverging from the methodology contained at Appendix 8.1. Whether this omission is intentional as the assessor consider that changes to the landscape are unlikely or not relevant, this should be made explicit.</p> <p>Section 8 of Chapter 8 addresses the potential impacts on visual and landscape receptors. It is noted that moderate adverse effects are not considered significant. The issue of whether moderate effects can be significant was raised at the scoping stage. The ES states that in cases were a moderate</p>	<p>Future baselines would arise where consented proposals, which are not yet present in the landscape, are expected to be constructed. For clarity ES Vol 1: Section 8.5.5; Cumulative, has been updated to explicitly state there are no future baseline scenarios to consider.</p> <p>No Change</p> <p>The scoping stage comments are addressed above. This comment reflects a misinterpretation of the methodology</p>

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			<p>effect is identified, professional judgment should be used. However, it is noted that where moderate adverse effects are identified resulting from Moderate / Slight changes to High / Medium sensitivity receptors, the rationale behind the professional judgement is not provided.</p> <p>It is understood that the LVIA has been conducted considering the measures included in the Landscape and Ecological Management Plan (Appendix 9.4) embedded in the design of the project. As these measures are not essential to the purpose of the project (i.e. the production of renewable energy) but will require direct actions of the interested parties throughout the lifespan of the project, the Inspectorate does not consider them to be 'embedded'.</p>	<p>which states clearly that only Major and Major/moderate effects are considered to be significant, and that: "In some circumstances where 'Moderate' effects are predicted, professional judgement will be applied to ensure that the potential for significant effects arising has been thoroughly considered."</p> <p>No Change</p> <p>This simply means that before setting out a judgement that effects fall just below the threshold of significance (and are Moderate), the assessor will have very carefully considered whether they should be identified as significant (and therefore Major/moderate). The rationales for such judgements are provided within the assessment text.</p> <p>No Change</p> <p>The effects of the development without planting mitigation is considered in the LVIA within the assessment of effects before the planting has matured. However, mitigation proposals included in the LEMP and the landscape masterplan for the project are considered primary mitigation and form an intrinsic component of the project design (in line with Section C.2 on Page 8 of IEMA guide to Shaping Quality Development). It is normal practice for all forms of development, that proposed planting is treated</p>

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
			<p>The assessment itself relies on the management of the hedgerows on site and the strengthening of existing vegetation to conclude that the identified potential impacts are non-significant. Thus, it is unclear whether the project will have a residual impact. The applicant should clarify this point and whether the LEMP is part of the mitigation measures.</p> <p>The LEMP proposes the creation of wildflower areas but those are not shown on Figure 8.6 Landscape Proposal. The LEMP should clarify where areas of planting / enhancement (i.e. proposed wildflower meadows) will be.</p> <p>The inclusion of a monitoring plan in the LEMP is welcomed but it should be expanded to include how the areas will be monitored after the first three years.</p>	<p>as part of the development in EIA as it forms part of the plans to be approved – even though planting always requires some management to establish. The point that some management action is required to maintain the height of existing hedges is valid, however failure to undertake those actions would (inexorably) result in more substantial hedges which would not undermine the effectiveness of the mitigation. EIA guidance also indicates that inexorable (tertiary) mitigation should be included in the assessment of effects.</p> <p>No Change</p> <p>Figure 8.6 Landscape Proposal illustrates areas of hedgerow and tree planting and has been updated to illustrate the grassland areas described within the LEMP.</p> <p>No Change</p>

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy/Update for the Phoenix Solar Park Application
			<u>Minor Corrections</u> <ul style="list-style-type: none"> Table 6.2 at Page 46 of the ES Volume 1 may require re-formatting; Table 15.1 use the abbreviation “EWC”. It would be useful to include it in the List of Abbreviations; Appendix A8.4 viewpoint analysis – paragraph A13 is missing a drawing number 	<p>The monitoring section of the LEMP: Section 3.6 has been expended to include monitoring throughout the operational phase of the Proposed Development.</p> <p>No Change</p> <p>Table reformatted. No Change</p> <p>Abbreviation added to ES Vol 1 abbreviations table.</p> <p>No Change</p> <p>Drawing reference number inserted.</p>

Table 2: Previous Community Consultee Responses

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy
Cosheston Community Council	21 st September 2020	Formal notification of draft application	Response received 30 th October confirming that the Community Council would like a virtual	Microsoft teams meeting subsequently organised for 1 st December 2020.

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy
		publication issued by email followed up with the delivery of a short presentation during a microsoft teams meeting providing details of the proposed Development.	<p>meeting to discuss the proposed Development.</p> <p>Questions sent through for discussion during the meeting:</p> <ol style="list-style-type: none"> 1. What is the life span of these panels? 2. How will they be disposed of when they are no longer working? 3. What sort of chemicals might end up in the soil after it has rained? I believe petroleum is often used in the panels. 4. Do the local villages get any benefit from the energy that is produced? 5. How will this affect the local habitat? Birds, squirrels, hedgehogs. 6. What are the dangers from EMF? 7. Is it possible to ask Wessex Solar if (in lieu of a donation to Cosheston) if they are able to facilitate a safer junction at the 	<p>Answers were emailed as follows and discussed during the call:</p> <ol style="list-style-type: none"> 1. The installed solar panels will be capable of operating for the proposed 40 year operational lifetime of the Blackberry Lane Solar Park, although they will experience a decrease in efficiency over time. 2. The solar panels would be disposed of in accordance with all current regulations and guidance at the time of decommissioning in 40 years time. Currently many manufacturers offer schemes for reuse or disposal, and the panels will be recycled where possible. 3. I can confirm that there is no petroleum within the proposed solar panels. No chemicals will enter the soils as a result of rain upon the solar panels. There are no liquid chemicals within the proposed solar panels. Common components within the panels such as silicon are in their solid state sealed within the glass panel and so will not be released during the construction, operation or on-site decommissioning of the proposed solar park. 4. Yes. We generally agree a community benefit fund with the community council following a discussion regarding possible community projects which we could provide funding towards.

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy
			<p>finger post, making land / finance available?</p> <p>8. Why does good farm land have to be used for solar parks?</p> <p>9. If the park is given permission to go ahead, will screening be put around it to screen it from view on a busy main road?</p>	<p>5. A detailed Ecological Impact Assessment has been completed using survey data obtained from across the site. Due to the buffers which have been built into the design; including those from hedgerows and ditches, no negative impacts upon wildlife and habitats have been identified. The proposed landscape and ecological management plan will see the creation of nearly 500m (now c. 622m) of new hedgerow and trees and the conversion of the fields from arable to permanent grassland for sheep grazing. This will result in an increase in biodiversity over the lifetime of the development. No existing hedgerows or trees will be removed as part of the development proposals.</p> <p>6. Like all electrical and electronic devices, solar panels and inverters give off non-ionising radiation (electromagnetic radiation or EMR). Non-ionising radiation does not have enough energy to damage atoms and molecules, for example visible light is also non-ionising. There is no scientific or anecdotal evidence that EMR (or Electro-magnetic fields) from solar parks pose a potential health risk to individuals working on site or members of the public in the vicinity of the site.</p> <p>7. The site selection process was explained as were the details contained within the Land Quality Implications Assessment (Appendix A5.3).</p>

Consultee	Date Consulted	Method of Consultation	Detailed Consultee Response – Key Points	Action/Response from Wessex Solar Energy
				8. The landscape proposals were reiterated as detailed in Figure 8.6.
County Councillor for Cosheston	21 st September 2020	Formal notification of draft application publication issued by email	Comments made during the meeting with Cosheston Community Council on 1 st December 2020 – Discussion regarding community projects and funding should the proposed Development be approved.	Confirmation provided that a community fund will be made available and that further discussions as to potential community projects is welcome.

Table 3: Additional comments received during the determination period for the larger Blackberry Lane Solar Park DNS Application

Consultee	Method of Consultation	Issues discussed and agreed	Action/Response from Wessex Solar Energy
Trunk Road Agent and Transport Division of Welsh Government	Email and discussion	<ol style="list-style-type: none"> A variety of management and mitigation measures were agreed upon to ensure safe use of the proposed traffic route and access point for construction traffic and other road users: <ol style="list-style-type: none"> A pre-commencement survey of the A477/Lower Nash priority junction and a subsequent scheme for 	These agreed measures have been included within the Draft CTMP

Consultee	Method of Consultation	Issues discussed and agreed	Action/Response from Wessex Solar Energy
		<p>any upgrading or widening works deemed necessary;</p> <p>b) The retention and maintenance of the shared use path;</p> <p>c) Three banksmen to be located along the site entrance, the entrance to Nash Villa and A477/Lower Nash junction during the construction phase of the development;</p> <p>d) A commitment to a pre and post construction condition survey along Nash Lane;</p> <p>e) Details of a traffic management scheme to include positive traffic control and a temporary speed reduction order on the A477 during the construction phase of the development; and</p> <p>f) The provision and agreement of a construction schedule and details of the off-site management of vehicle movements including layover areas.</p>	
Pembrokeshire County Council Ecologist	Email and discussion	<p><i>"Much of the site is made up of species poor improved grassland and it is not anticipated that there would be a loss of any high value ecological habitats. The submitted ecological management scheme is welcomed and should result in an overall biodiversity enhancement for the site. Subject to the following caveats, the Proposal would not</i></p>	Section 9.12 of this EclA confirms no significant effects are anticipated for designated sites, habitats or species as a result of the proposed solar park.

Consultee	Method of Consultation	Issues discussed and agreed	Action/Response from Wessex Solar Energy
		<i>result in unacceptable impact and would accord with policies GN.1 and GN.37 as well as the Biodiversity SPG.”</i>	
		<i>“Badgers – pre-commencement checks for badger setts have been proposed. Any works within 30m of an active sett will require a licence from NRW. Therefore, the pre commencement checks should include anything within 30m of any works.”</i>	Badger have been assessed as a VER (Section 9.4) and are likely to use the site for foraging and commuting. Embedded mitigation (Section 9.6) commits to a pre-commencement survey for badgers and confirm that the survey scope will include all suitable habitat within 30m of any works. Should any setts be identified during the pre-commencement checks that could be affected by the proposed development, then an appropriate mitigation strategy will be prepared and agreed with NRW as part of a licence application.
		<i>“Bats – NRW’s response at pre-application did not anticipate significant impacts upon the Pembrokeshire Bat Sites and Bosherton Lakes Special Area of Conservation. The ES has concluded that the only foraging and commuting habitats are associated with the tree lines and hedgerows on and adjacent the development site. However, there doesn’t appear to have been any consideration for impacts that the presence of the solar panels themselves will have in terms of collision risk. No trees are proposed for removal as part of the proposed development, however should any trees require works or</i>	Section 9.8.2 assesses the potential for collision risk of the solar panels to bats. A study detailed within the European Commission’s Potential Impacts of Solar, Geothermal and Ocean Energy on Habitats and Species Protected Under the Birds And Habitats Directives – Final Report (Lammerant, L., Laureysens, I. and Driesen, K. (2020) Final report under EC Contract ENV.D.3/SER/2017/0002 Project) suggests that although bats may confuse smooth flat

Consultee	Method of Consultation	Issues discussed and agreed	Action/Response from Wessex Solar Energy
		<i>felling at any time these should be subject to a bat survey to assess the potential for bat roosting."</i>	surfaces with water bodies, it seems unlikely that this would have detrimental effects on local bat populations. Solar parks are unlikely to result in significant injury or mortality to bats as a result of collision above and beyond other flat/smooth built developments. Solar panels do not have moving parts and therefore bats should be able to detect them as well as any other man-made objects introduced into the environment. Therefore, Section 9.8.2 of this EclA concludes that a negligible (adverse) impact and a non-significant negligible (adverse) effect is anticipated on bat with regards to collision risk.
		<i>"Tree and hedgerow buffer – to provide further confidence in the maintenance of the Root Protection Area for trees and ensure the hedgerow is adequately buffered, it is recommended that the 5m buffer starts from the edge of the hedgerow and woodland habitats rather than the centre."</i>	Section 9.6 of this EclA sets out the embedded mitigation which has been incorporated into the scheme. This section explains that the centre line of the hedgerows has been used when prescribing the buffer zones for hedgerows as these represent a 'fixed' start point. The hedgerows are currently managed as part of the sites arable use and as such the width of the hedgerows varies throughout the year in line with the current cutting regime. This could introduce some ambiguity when translating the buffer zone from paper onto the ground.

Consultee	Method of Consultation	Issues discussed and agreed	Action/Response from Wessex Solar Energy
		<i>“Lighting – As stated in the ES there must be no external lighting during the construction, operation or decommissioning of the Proposal.”</i>	No external lighting is proposed during the construction, operation or decommissioning of the proposed solar park.
		<i>“CEMP – works must be undertaken in accordance with the CEMP with particular attention being paid to protection of the existing wet drainage ditches on site to ensure there are no impacts upon the Pembrokeshire Marine SAC. Included in the CEMP should be a note on checking for areas of silty run-off during construction and decommissioning during periods of heavy rainfall.”</i>	Silt prevention methods are included within the Construction Environmental Management Plan (CEMP) submitted as part of this application (DRN: BL009). The CEMP includes monitoring by the site manager for the presence of any silt run-off across the site and silt fencing will be installed as appropriate to prevent silt from entering existing watercourses and ditches.
		<i>“Mitigation and Enhancement – All works must be undertaken in accordance with Section 9.6 of the submitted ES, Section 2.3 of the Ecological Mitigation and Management Plan and the Landscape Management Plan. The proposed enhancements are also likely to result in habitat improvements for several species. The addition of hibernacula opportunities as part of the enhancement scheme would be welcomed.”</i>	Section 9.6 of this EclA sets out the embedded mitigation which has been incorporated into the scheme. This includes the creation of six permanent log and stone piles, as well as the collection and piling of arisings generated through hedgerow management activities. The locations of the hibernacula are shown on the Landscape Plan (Figure 8.6).
		<i>“It has been recommended for previous Solar Farm applications that the applicants make contact with the Islands Conservation Advisory Committee (ICAC) of the Wildlife Trust of South and West Wales regarding opportunities to monitor solar park sites for disorientated Manx Shearwater. Manx Shearwater are one of the designating species of the Skomer,</i>	Section 9.8.2 assesses the potential for the proposed solar park to encourage disorientated, young Manx Shearwater into the site. Due to a lack of previous research it is not well known whether young Manx Shearwater would be likely to try to land at the solar park.

Consultee	Method of Consultation	Issues discussed and agreed	Action/Response from Wessex Solar Energy
		<p><i>Skokholm and the Seas off Pembrokeshire Special Protection Area (SPA). At the end of August/September young Manx Shearwaters set off from the Islands for the first time and in certain weather conditions (onshore winds, low clouds and fog) the young birds will end up inland, become disorientated and will think wet roads and tarmac surfaces and rivers are the sea and attempt to land. However without rocky outcrops for them to climb on to and launch from the birds become stranded. They have been recorded in Milford, Spittal, Pembroke and luckily in these locations a member of the public is normally able to help. ICAC think that during these weather conditions the young birds may think the surface of the solar arrays are the sea and possibly try and land on them. Obviously as there will not be much activity in these areas it is unlikely the birds would be found until it was too late. They would be very keen during August/September should such weather conditions occur to be allowed access to solar farms to survey for any stranded birds so they can be released. This would involve one or two individuals surveying the site solely for the purpose of finding any disorientated birds. It would not impact on the use of the farm or reflect badly on the development itself but would be dependent on the land owner allowing access to the site."</i></p>	<p>As part of correspondence for the previous DNS application, Lisa Morgan, Head of Islands and Marine for the Wildlife Trust of South and West Wales, confirmed that in her experience, young birds are more likely to be attracted to well-lit areas than those which could be mistaken for the sea/water.</p> <p>The proposed solar park will not be lit during construction, operation or decommissioning and therefore artificial lighting will not impact young Manx shearwater. However, light reflected from other sources and moonlight could potentially attract the young birds. Therefore, Section 9.8.2 sets out a proposed monitoring program for young Manx Shearwater to determine if they are being mistakenly attracted to the solar park.</p>

2.6 Declarations

The following declarations are provided in accordance with The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016.

2.6.1 Site Notice

- 30 Two site notices will be displayed for not less than 28 days from 8th January 2024.

2.6.2 Notification of Owners of Adjoining Land

- 31 A consultation notice will be issued to any owner or occupier of any land adjoining the land to which the proposed application relates as detailed below:

- DAVID GWYN BRACE and MARY JAYNE BRACE of Coed Parc, Coychurch, Bridgend CF35 5HW;
- DIANE FRANCES EVANS of Dolcoed, Manordeilo, Llandeilo SA19 7BL;
- CATHERINE MARY LOUISE THOMAS of Pancross Farm, Llancarfan, Barry CF62 3AJ;
- DAVID GEORGE KENNIFORD of Green Gables, Upper Lamphey Road, Pembroke, Pembrokeshire;
- ELIZABETH MARY KENNIFORD of Green Gables, Upper Lamphey Road, Pembroke, Pembrokeshire; and
- ROBERT JAMES KENNIFORD of Lower Nash Farm, Pembroke Dock, Pembrokeshire SA72 4SU.

2.6.3 Consultation Period

- 32 This report will be updated following a 28 day consultation period for the draft application.
- 33 A full copy of the draft application will be made available for the 28 day duration of the consultation period as detailed in Section 2.3. The information published satisfied the requirements of The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016).

2.7 Summary

- 34 This report demonstrates that the proposed development has taken account of the consultation responses received in accordance with The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016.

2.8 Conclusion

- 35 This Pre-Application Consultation Report demonstrates full compliance with The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 and will be updated prior to the submission of the final planning application.

**Appendix A Site Notice, Notice Issued to Community
Consultees and Adjoining Landowners**

SCHEDULE 1B

Articles 2C & 2D

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 2C AND 2D

(to be served on owners and/or occupiers of adjoining land and community consultees; and displayed by site notice on or near the location of the proposed development)

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Proposed development at Lower Nash Farm, Pembroke Dock, Pembrokeshire, SA72 4SU

I give notice that Wessex Solar Energy (WSE Pembrokeshire Ltd)

is intending to apply for planning permission to: construct and operate a solar park and associated infrastructure.

You may inspect copies of:

- the proposed application;
- the plans; and
- other supporting documents

online at

www.wessexsolarenergy.co.uk/PhoenixSolarPark.zip

and computer facilities are available to view this information online at Pembrokeshire Library and Information Centre, Commons Road, Pembroke, Pembrokeshire, SA71 4EA, between the hours of 10am and 1pm and 2pm and 5pm Monday - Saturday..

Anyone who wishes to make representations about this proposed development must write to the applicant/agent at info@wessexsolarenergy.co.uk or Barmoor Farm House, Morpeth, Northumberland, NE61 6LB.

by 9th February 2024

Signed: *C. E. Peacock*

Date: ...02/01/2024.....

Appendix B Feedback Received from Residents in relation to the Blackberry Lane Solar Park DNS Application

Comment Number	Comments collected on Feedback Forms	Previous Wessex Solar Energy Comment
1	Although hate to spoil countryside solar panels better than wind turbine. At least not detrimental to animals	Noted. Solar parks have very localised visual impacts compared to other forms of renewable energy generation.
2	Whilst we are very supportive of PV farms in principle this is subject to developments not impacting negatively on the use of the land. The scheme, Blackberry Lane, is depicted as covering a public footpath and as such we would like to be assured the provision of an alternative route is provided or the scheme should be altered.	Rights of way are addressed in Chapter 13 of the Environmental Statement. The path which crosses the site is not an official path on the definitive footpath map and so has not been retained. However, there is a footpath located approximately 80m to the west (at the furthest point) which will be retained and will not be affected by the proposed development.
3	We would like to know exactly where the entrance to the site would be owing to the trouble we had having a tarmac road to "Hash Church" we do not want that road to our church being damaged due to heavy lorries delivering items for the construction to the proposed site.	The site entrance and the means of access are identified in Chapter 13 of the Environmental Statement. A full condition survey of the road will be undertaken prior to the works starting and the road repaired to the existing standard or better following completion of the construction phase. The site access point is located some distance from the church and construction vehicles will have no reason to drive near to the church.
4	It is a shame to see good farmland go under solar panels, but this would be mitigated if the land under them was managed for wildlife e.g. flower meadows. If you could show that you could do this, then the project would have more audible support from many of us.	As identified in Chapter 8, and Chapter 9 of the Environmental Statement and the Landscape and Ecological Management Plan (document reference BL012) there will be a scheme of planting that will enhance the biodiversity of the site and this will subsequently be actively managed to ensure that the biodiversity gains are maintained.

Comment Number	Comments collected on Feedback Forms	Previous Wessex Solar Energy Comment
5	Whilst I agree with the need for green energy, I feel that the proposed area is too large for a small village especially as we already have a solar park in the village.	Noted. The scale of the project is addressed in the Landscape and Visual Impact Assessment.
6	Just like the one already in Cosheston. Why do you have to build them on good productive land, you should be locating at sites with poor agricultural qualities.	The site selection process is summarised in Chapter 5 of the Environmental Statement.
7	Brilliant and an English/British outfit. The last one made a donation to village hall.	Noted and thank you. We will in due course talk with local organisations about any support for projects that might be well received in the local area.
8	Pelling mistake in brochure under sites heading – noise, presume the desired word was quiet not quite.	Thank you, noted.
9	Waste of top-quality agricultural land, on eyesore and a distraction for motorists on the main road.	The site selection process is summarised in Chapter 5 of the Environmental Statement. The glint and glare (document reference BL005) and landscape assessment (ES Volume 1 Chapter 8) address issue of views from main roads and other key viewpoints.
10	Concern that building on fields that produces crops and food for animals where there are many site in wales not suitable for this on the hills and mountains where solar panel farms or wind farms could be situated.	The site selection process is summarised in Chapter 5 of the Environmental Statement.
11	It is sad to use good quality land that could be farmland. But support the need for more solar energy.	The site selection process is summarised in Chapter 5 of the Environmental Statement.
12	We need to be investing in renewable energy due to the climate crisis for more than we currently are. I have no objection – but – for the record – as I live in Carew, I almost never visit Cosheston and therefore my views are less important than the local residents views whom will be impacted to a greater extent should this scheme be approved.	Thank you and noted.

Comment Number	Comments collected on Feedback Forms	Previous Wessex Solar Energy Comment
13	Please advise how the public footpath across the north west of the site will be affected. Please confirm type and height of perimeter fencing. Please confirm that no construction traffic will use Blackberry Lane [road].	Rights of way are addressed in Chapter 13 of the Environmental Statement. The path which crosses the north western field of the site is not an official path on the definitive footpath map and so has not been retained. However, there is a footpath located approximately 80m to the west (at the furthest point) which will be retained and will not be affected by the proposed development. We can confirm that no construction traffic using Blackberry Lane to the east of the site.
14	We are positively in favour of environmentally favourable projects. Our only proviso is that the project uses the road to Nash Farm of Church Road than Blackberry Lane for access during construction.	Thank you and noted. We can confirm that no construction traffic using Blackberry Lane to the east of the site.
15	Very disappointed that the proposed development of solar panels are being considered on Grade 1 land when this should only be used for agriculture. When there is ample poor land around the county. It should definitely not be allowed on grade 1 land.	We can confirm that there is no Grade 1 land within the proposed application boundary. An agricultural land classification survey is included as Technical Appendix A5.1. In addition, the site selection process is summarised in Chapter 5 of the Environmental Statement.
16	Sadly you company is only industrialising the countryside more and more and only standing still no matter how much land is needed by you as the unsustainable population growth continues! On a conservation point, I am in buglife, RSPB + woodland trust every solar farm I've noticed have no wildlife meadows (as promoted in the newspapers at the start) only grass with the same bog basic use of sheep in them.	Full details of the ecological impacts and enhancements are included in Chapter 9 of the Environmental Statement. Chapter 8 and 9 of the Environmental Statement and the Landscape and Ecological Management Plan (document reference BL012 also include details of the planting scheme in the context of the Landscape and Visual Impacts.

Comment Number	Comments collected on Feedback Forms	Previous Wessex Solar Energy Comment
17	Not happy about panels. We have more than our fair share here. Green space is disappearing... conflicting information about recycling of panels or what happens when they are no longer usable. Effects on land and water course. No Benefit to local community in terms of use of energy. Surely there must be an effect on the ecosystem regarding the wildlife in those fields?? Butterflies etc	Impacts on water courses are discussed in Chapter 9 and Chapter 12 of the Environmental Statement. The impacts on ecology and mitigation proposed to ensure biodiversity enhancements on the site are included in Chapter 9.
18	I feel it is criminal to cover some of the best land in Pembrokeshire with unsightly glass which will be visible from everywhere. Why don't you make sure of the hills we have in Wales with the added advantage of being nearer the sun.	The site selection process is summarised in Chapter 5 of the Environmental Statement
19	We have plenty of energy and oil and gas establishments in Pembrokeshire already with pylons and pipelines etc. Why do we have such ugly solar panels on top of everything. Not very happy.	The need for solar energy is addressed in Chapter 3 of the Environmental Statement. The site selection process is summarised in Chapter 5 of the Environmental Statement.
20	Having seen other solar parks they are not very pleasant to the eye I think the land is been better raised by animals which land is meant to be. Wouldn't it be better to place these panels on building rooves out of sight.	Sheep will still be able to graze around the panels. A full Landscape and Visual Impact Assessment is included in Chapter 8 of the Environmental Statement. There is a need for both roof top and ground mounted solar projects if we are to meet the UK's targets of net zero carbon by 2050.

Comment Number	Comments collected on Feedback Forms	Previous Wessex Solar Energy Comment
21	We would like reassurance that this development will not affect rights of way across a number of those fields.	Rights of way are addressed in Chapter 13 of the Environmental Statement. The path which crosses the north western field of the site is not an official path on the definitive footpath map and so has not been retained. However, there is a footpath located approximately 80m to the west (at the furthest point) which will be retained and will not be affected by the proposed development. We can confirm that no construction traffic using Blackberry Lane to the east of the site
22	Our main concern looking at the map provided is that public footpaths crosses the land proposed for the solar farm site. The footpath is used by locals.	Rights of way are addressed in Chapter 13 of the Environmental Statement. The path which crosses the north western field of the site is not an official path on the definitive footpath map and so has not been retained. However, there is a footpath located approximately 80m to the west (at the furthest point) which will be retained and will not be affected by the proposed development. We can confirm that no construction traffic using Blackberry Lane to the east of the site

Comment Number	Comments collected on Feedback Forms	Previous Wessex Solar Energy Comment
23	<p>We will give a short bullet point observation here and will be pleased to talk to your representatives in more detail.</p> <ul style="list-style-type: none"> - We moved to Upper Nash bungalow in March 2019 - We do not want to give a NIMBY reply - We do feel that the farmland being taken is some of the best in Pembrokeshire - We are semi retired farmers from the Pontypridd area and have extensive solar PV experience - Indeed we had a 25 acre site proposed on a farm of ours and proposed to planning but turned down. - Had solar PV on our old farm house at same n/s latitude it is very successful 	<p>An agricultural land classification survey is included as Technical Appendix A5.1. In addition, the site selection process is summarised in Chapter 5 of the Environmental Statement.</p>
24	<p>I am a huge supporter of solar energy but think it would be better on every roof than in fields as a general policy. However I could be more positive about your project if you committed to establish a nature reserve between the panels say for insects / butterflies/ amphibia</p> <p>I would be willing to volunteer as a warden or maintenance for such a reserve + could be sure to recruit others</p>	<p>Thank you for your support. The solar park will be the subject of wildflower sand grassland seeding and significant biodiversity enhancement measures. These are summarised in greater detail in Environmental Statement Volume 1 Chapter 9 and within the Landscape and Ecological Management Plan. The site will be maintained to ensure that this biodiversity gain is maintained throughout the project lifetime. We will consider how volunteers may be able to assist in this though as you will understand this involves reviews of insurances etc to allow volunteers to access the site and in the first instance these duties may best be undertaken by the appointed management team.</p>
25 (by email)	<p>Email 1: Please see below the view from our property in [redacted for confidentiality]. Its outlook was one of the features which attracted us to it.</p>	<p>The following was sent back to the resident by email:</p>

Comment Number	Comments collected on Feedback Forms	Previous Wessex Solar Energy Comment
	<p>As you can see, we will be quite considerably impacted by the proposed development. Whilst we will always favour the use of renewable energy before another nuclear or fossil fuelled power station, we have obvious concerns as to how this will affect the value of our home. It is also matter of concern as to the reflective mirror of the sun from which we will receive full glare.</p> <p>We would appreciate your reassurances on our concerns. ====</p> <p>Email 2: We are aware that this is, very much, at a development stage but do still have concerns as to the viewpoint.</p> <p>Your proposed visual impact assessment will be a point far below the level of our property and, whilst 4m hedge boundaries may help those below us, I fear they will do little to lessen the view we will we have.</p> <p>However, I do reiterate that we would still rather see the development of renewable energy over another nuclear or fossil fuelled power station!</p>	<p>“Thank you for your email. We appreciate your concerns and are happy to provide additional information in relation to the points which you have raised.</p> <p>Firstly, I understand that there may be a misunderstanding locally as to the status of the application. I would like to reassure you that the application is still in the early stages of planning and has not yet been submitted.</p> <p>The development falls under the new Development of National Significance process and so will be considered and decided by the Welsh Inspectorate not the Local Council. Please see below a summary of the upcoming application process:</p> <p>2) Publication of a draft version of the entire planning application for comments by consultees including local residents - likely mid August</p> <p>3) Pre-submission consultation period on draft documents - minimum 42 days (we will write to you and other local residents informing you that the documentation is available to view and where/how you can view it. We will also provide full details of how you can make comments).</p> <p>4) Changes/additional studies will be completed based on the comments received from the consultees and residents - September</p> <p>5) We will formally submit the planning application to the Welsh Inspectorate - October</p>

Comment Number	Comments collected on Feedback Forms	Previous Wessex Solar Energy Comment
		<p>6) The Welsh Inspectorate will register the application which can take up to 42 days</p> <p>7) A post submission consultation exercise will take place organised by the inspectorate - 5 week period once registered.</p> <p>8) Once the application is registered we will again write to you and other local residents to let you know so that you can review the documents and comment if you wish.</p> <p>9) Consideration of the application by the Welsh Inspectorate - up to 36 weeks</p> <p>10) Application approved or refused by the Welsh Inspectorate</p> <p>Please see below and attached some additional information in relation to your concerns regarding visual and glint impacts.</p> <p>As part of our application we intend to include a specific viewpoint assessment not far from your property.</p> <p>For clarity regarding the site boundary, please find attached the relevant draft viewpoint figure which shows the extent of the site edged in a white dashed line.</p> <p>You will be able to review and comment further once the full landscape and visual impact assessment is available in the next couple of weeks, but as you can see we have selected fields further from the road which has reduced the potential visibility.</p>

Comment Number	Comments collected on Feedback Forms	Previous Wessex Solar Energy Comment
		<p>In addition, we are proposing landscape improvements which will include additional planting and maintenance of the existing hedgerows to a height of 4m. This will further screen the panels from your view, although I appreciate that they will still be visible.</p> <p>With regard to glint effects, our application documents will include a specific glint assessment which will look at when glint may be experienced at specific locations. You will be able to review this once the full draft documentation is available. However, I can confirm that due to the nature of reflection angles, glint effects are not experienced south of a solar site and so you would therefore be affected by glint.</p> <p>I apologise that I cannot provide more detail at this stage but we are still preparing our documentation and there is a lot of information contained within our assessments – too much to put into one email.</p> <p>As explained above, we will let you know when the full draft documentation is available for review and please do not hesitate to contact me if you would like to raise additional points once you have had an opportunity to read through the assessments.”</p>
26 (by email)	Please see my comments attached, this is not comprehensive but just some initial thoughts, whilst I agree with the principle	Thank you for your reply.

Comment Number	Comments collected on Feedback Forms	Previous Wessex Solar Energy Comment
	<p>of solar as an alternative energy, this development is at the expense of food production by removing at least 89 acres of prime farmland from productive use! I am quite sure there are alternative south facing sites in Pembrokeshire that are lower quality land where the loss of productivity will have much less impact. A Climate Emergency is not an opportunity to reduce food production resources!</p> <p>It is reckless to propose any development which compromises road safety, in particular your access is proposed from Blackberry Lane located between the Fingerpost junction on the A477 and the single track access to Upper Nash hamlet, both of which have had their share of accidents over the years, It is an absolute certainty that this development will, both during its development and after completion, significantly increase the danger to road users and cyclists using this section of the A477.</p> <p>I fail to see why you don't propose locating this site adjacent to one of the existing solar farms in Cosheston, at least then the visual impact would be lessened by an expansion of an existing facility rather spoiling a pristine site.</p> <p>I have several more points to make about this development but in the interests of brevity I'll save those for the next stage.</p> <p>[There was then an email attachment of a feedback form which noted the following]</p>	<p>An agricultural land classification survey is included as Technical Appendix A5.1. In addition, the site selection process is summarised in Chapter 5 of the Environmental Statement.</p> <p>Road safety and access addressed in Chapter 13 of the Environmental Statement.</p>

Comment Number	Comments collected on Feedback Forms	Previous Wessex Solar Energy Comment
	<ul style="list-style-type: none"> a) Why are you proposing this on Grade A farm land, why not next to one of the existing 2 solar farms in Cosheston b) negative visual impacts to south of the A477 c) Traffic danger next to fingerpost junction which is an accident blackspot anyway d) Creates no local employment e) Compromises existing access to Upper Nash etc 	
27 (by email)	<ul style="list-style-type: none"> 1. What is the life span of these panels? 2. How will they be disposed of when they are no longer working? 3. What sort of chemicals might end up in the soil after it has rained? I believe petroleum is often used in the panels. 4. Do the local villages get any benefit from the energy that is produced? 5. How will this affect the local habitat? Birds, squirrels, hedgehogs. 6. What are the dangers from EMF? 	<p>Reply: Thank you for your email. I apologise for the delayed reply. Please see below a response to each of your queries.</p> <ul style="list-style-type: none"> 1. What is the life span of these panels? <p>The installed solar panels will be capable of operating for the proposed 40 year operational lifetime of the Blackberry Lane Solar Park, although they will experience a decrease in efficiency over time.</p> <ul style="list-style-type: none"> 2. How will they be disposed of when they are no longer working? <p>The solar panels would be disposed of in accordance with all current regulations and guidance at the time of decommissioning in 40 years time. Currently many manufacturers offer schemes for reuse or disposal, and the panels will be recycled where possible.</p>

Comment Number	Comments collected on Feedback Forms	Previous Wessex Solar Energy Comment
		<p>3. What sort of chemicals might end up in the soil after it has rained? I believe petroleum is often used in the panels.</p> <p>I can confirm that there is no petroleum within the proposed solar panels. No chemicals will enter the soils as a result of rain upon the solar panels. There are no liquid chemicals within the proposed solar panels. Common components within the panels such as silicon are in their solid state sealed within the glass panel and so will not be released during the construction, operation or on-site decommissioning of the proposed solar park.</p> <p>4. Do the local villages get any benefit from the energy that is produced?</p> <p>Yes. We generally agree a community benefit fund with the community council. We have a virtual meeting with Cosheston Community Council in the coming weeks to discuss the proposed development and possible community projects which we could provide funding towards.</p> <p>5. How will this affect the local habitat? Birds, squirrels, hedgehogs.</p>

Comment Number	Comments collected on Feedback Forms	Previous Wessex Solar Energy Comment
		<p>A detailed Ecological Impact Assessment has been completed using survey data obtained from across the site. Due to the buffers which have been built into the design; including those from hedgerows and ditches, no negative impacts upon wildlife and habitats have been identified. The proposed landscape and ecological management plan will see the creation of nearly 500m of new hedgerow and trees and the conversion of the fields from arable to permanent grassland for sheep grazing. This will result in an increase in biodiversity over the lifetime of the development. No existing hedgerows or trees will be removed as part of the development proposals.</p> <p>6. What are the dangers from EMF?</p> <p>Like all electrical and electronic devices, solar panels and inverters give off non-ionising radiation (electromagnetic radiation or EMR). Non-ionising radiation does not have enough energy to damage atoms and molecules, for example visible light is also non-ionising. There is no scientific or anecdotal evidence that EMR (or Electro-magnetic fields) from solar parks pose a potential health risk to individuals working on site or members of the public in the vicinity of the site.</p>

Comment Number	Comments collected on Feedback Forms	Previous Wessex Solar Energy Comment
		I hope that the above information is helpful. If you have any additional queries please do not hesitate to contact me.
28 (by email)	Have just received a leaflet in post regarding this. I would just like to say... Having watched David Attenborough's "our planet earth" documentary recently... Based on this alone! You have my blessings!! Good luck!	Noted and thank you !

Appendix C Notice Issued to Specialist Consultees

SCHEDULE 1C

Article 2D

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION Town and Country Planning (Development Management Procedure) (Wales) Order 2012

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLE 2D

(to be served on specialist consultees, as defined by article 2(1) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012

Purpose of this notice : this notice comprises a formal request for a pre-application consultation response under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Proposed development at Lower Nash Farm, Pembroke Dock, Pembrokeshire, SA72 4SU

I give notice that Wessex Solar Energy (WSE Pembrokeshire Ltd)
is intending to apply for planning permission to: construct and operate a solar park and associated infrastructure.

A copy of the proposed application; plans; and other supporting documents are attached/can be viewed online at

www.wessexsolarenergy.co.uk/PhoenixSolarPark.zip

In accordance with the requirements of article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a consultation response must be sent to cep@wessexsolarenergy.co.uk by 9th February 2024.

Signed: *C. E. Peacock*

Date: ...02/01/2024.....

Appendix D Residents Consultation Booklet



Dear Resident,

Proposed Phoenix Solar Park

As you may recall, a number of years ago we wrote to your household about proposals for a solar energy park on land at Lower Nash Farm, Coshaston, Pembrokeshire, SA72 4SU.

We have since revised our proposals reducing the project size.

We are writing to you about the revised planning application that we intend to submit early in 2024. Information on the revised scheme is included in this booklet. A full draft planning application can be viewed on our website via the following link:

<https://www.dropbox.com/scl/fo/mvvn7k4i4lcge598sfnew/h?rlkey=m016vlizbh18sft0yx8bmqpvtq&dl=0>

If you have questions or comments to share with us, then contact details, including an email address and postal address are provided in this booklet.

Yours,

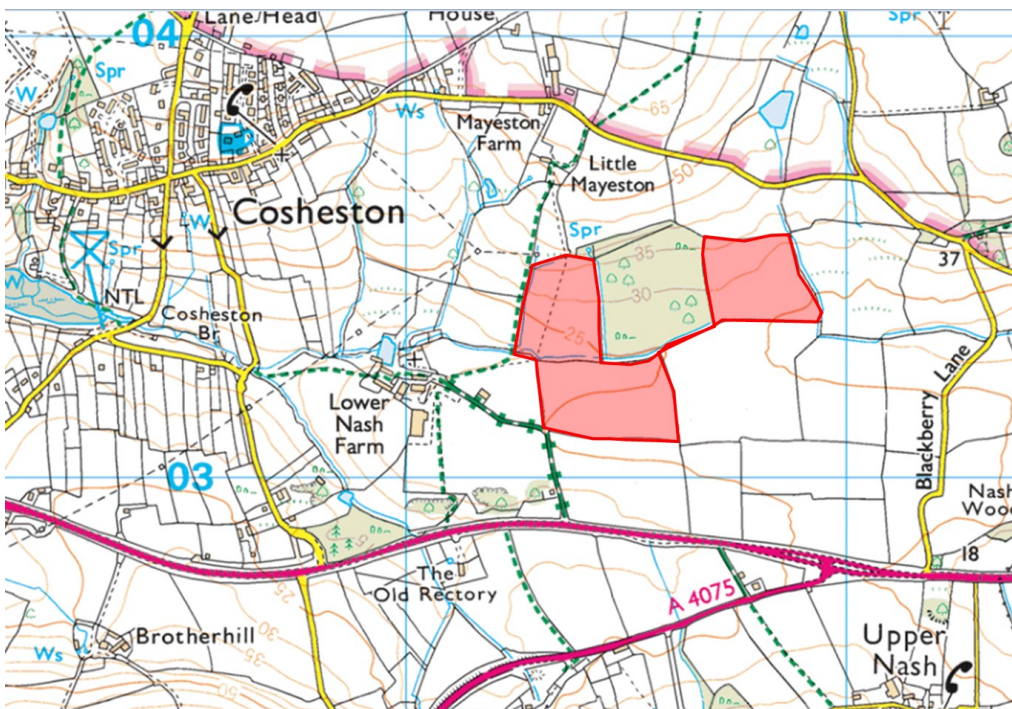
Wessex Solar Energy

THE PROJECT SITE

The proposed solar park site (outlined in red on the map below) is located on land at Lower Nash Farm, about 0.7 kilometres (km) south east of Cosheston, approximately 2.5km north east of Pembroke. The A477 is located about 200m to the south .

The site covers approximately 13.84 hectares comprising 3 fields. The land falls about 15m from north to south.

The site is not located within any Internationally, European or Nationally designated ecological or landscape sites. The Pembroke Coast National Park is located about 120 m to the north of the site at it's nearest point.



THE PROPOSED SOLAR PARK

The proposed Solar Park would be capable of generating about 9.9 MW of electricity at peak times and on average enough power annually to provide for over 3296 homes. It would comprise up to 25,500 panels.

There would also be about 5 small cabin to house inverters and one control building to house electrical equipment to prepare electricity for export to the local electricity network.

Electricity would be exported to the local electricity grid via an underground cable to the existing Golden Hill Substation located 2.3 km to the south west.

Photographs 1-4 show typical site infrastructure

- 1) Front face of a solar panel row
- 2) Rear of a solar panel row showing the steel supports
- 3) Inverter stations as shown would convert DC to AC electricity
- 4) A substation steps up electricity generated to 33kV for export to the grid.



WHAT HAPPENS NEXT?

Depending upon any issues raised on our draft planning documentation it is expected that a full planning application will be made to Pembrokeshire County Council within the next two months.

If and when we have lodged our application we will write to residents again to confirm this and provide details of the application reference number along with further details of the final project design.

The draft planning submission includes significant levels of detail. We hope this document helps to answer any questions that you may have regarding the proposals. However, we are happy to receive comments and questions by e-mail or post.

Our contact details are as follows:

E-mail: info@wessexsolarenergy.co.uk

Post: **Wessex Solar Energy
Barmoor Farm House
Morpeth
NE61 6LB**

Website: www.wessexsolarenergy.com