

PHOENIX SOLAR PARK



Planning Statement

December 2023

Document Reference Number: P006

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List of Abbreviations

AC	Alternating Current
AOD	Above Ordnance Datum
DNS	Development of National Significance
EIA	Environmental Impact Assessment
ES	Environmental Statement
ha	hectares
HGV	Heavy Goods Vehicle
km	kilometres
kV	kilovolt
kWh	kilowatt hours
LDP	Local Development Plan
m	metres
mm	millimetre
MW	Megawatts
NO_x	oxides of nitrogen
PM₁₀	particulate matter of less than 10 microns
PV	photovoltaic
PPW	Planning Policy Wales
SAC	Special Area of Conservation
SIA	Settings Impact Assessment
SPG	Supplementary Planning Guidance
SSSI	Site of Special Scientific Interest
SO₂	sulphur dioxide
TAN	Technical Advice Notes
UK	United Kingdom
VOCs	Volatile Organic Compounds
WSE	Wessex Solar Energy
ZVI	theoretical visual influence

1 Planning Statement

1. This document provides a summary of the relevant planning policy and material planning matters that relate to the proposed Phoenix Solar Park. To the extent that is practical the document does not repeat significant amounts of information can be found elsewhere in the planning application documentation. It should therefore be read in conjunction with the full set of documents that form the planning application.

1.1 Introduction to the project

2. Wessex Solar Energy proposes to construct a solar park capable of exporting up to 9.99 Megawatts (MW) at Alternating Current (AC) of clean, renewable electricity in a sustainable manner. The Solar Park will be located approximately 0.7 kilometres (km) south east of Cosheston, and approximately 2.5 km north east of Pembroke.
3. The site has previously been the subject of a planning application for a larger scheme with a capacity of 22 MW. The proposals now made are for a reduced scheme on some of the same land as the previous planning application. This is discussed further in ES Volume 1 Chapter 7.
4. Solar energy is an unlimited energy resource. Solar radiation can be harnessed either to produce hot water, known as a 'solar thermal', or electricity. Electricity can be generated using either photovoltaic (PV) cells or by arranging reflective surfaces which focus the sunlight onto a single point, which then heats water to produce steam to drive steam turbines.
5. For the purposes of the proposed development, PV cells represent the preferred technology.
6. To ensure that the project has taken into consideration the potential environmental and social issues associated with the development, Wessex Solar Energy (WSE) has undertaken an Environmental Impact Assessment (EIA) and other associated studies for the project.
7. This document provides details of planning policy and material planning considerations that are relevant to the proposed development.

1.2 Community Involvement

8. Consultation with the local community and other stakeholders is seen by WSE as an important part of the development process. 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.
9. This site has previously been the subject of a consultation exercise for a much larger scheme. As a result of that work WSE are very much aware of the general issues that are considered to be important by residents and stakeholders.

10. Based on a zone of theoretical visibility (ZTV) (ES Vol 3: Figure 8.5) and site visits 446 properties were identified which either had potential views of and/or who lived not far from the site.
11. An information booklet was prepared. A copy of this booklet is provided within the Pre-Application Consultation Report (PAC: DRN BL007).
12. The booklet was sent to the 446 properties along with a feedback form and a pre-paid return envelope. The booklet and feedback form included 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.
13. Further to the above consultation with residents WSE contacted Cosheston Community Council to introduce the proposed Development.
14. Wessex Solar Energy's consultations will be ongoing throughout the determination phase of the development and community consultee will be informed once the application has been formally submitted.

1.3 Planning History

15. The proposal is classed as 'major development' under The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 and the application will be submitted to Pembrokeshire County Council for determination.
16. Solar Farm developments are not specifically listed under either Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017, referred to as the EIA Regulations. However, the regulations do state that energy development, including "industrial installations for the production of electricity" covering an area exceeding 0.5 ha, are considered to be Schedule 2 developments.
17. An EIA Screening Direction was issued by PINS Wales on 7th February 2020 for a larger site at the same location which was subsequently the subject of an application under The Development of National Significance (Wales) Regulation 2016. The direction was that due to the size of the proposals, the proposed Development was considered to be EIA development under the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017. A Scoping Direction was subsequently issued by PINS Wales, dated 11th March 2020 (Appendix A1.1).
18. The Solar Park development now proposed is considerably smaller than that originally proposed, being 13.84 hectares as opposed to 34.25hecatres.
19. Pre-Application advice was issued by Pembrokeshire County Council for the smaller development. A formal request for an EIA Screening Opinion was submitted to Pembrokeshire County Council in December 2023 but has not yet been received. Although the proposed development may no longer be considered to formally represent EIA development under the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017, a thorough approach has been taken to identifying any potential environmental impacts. As such the Scoping Direction issued for the larger development in 2020 has been used to define the scope of the application and assessments prepared for the now smaller development which is proposed. An Environmental Statement (ES) has therefore been prepared as part of the planning application.

1.4 Site Description

20. The Solar Park will be located approximately 0.7 kilometres (km) south east of Cosheston, and approximately 2.5 km north east of Pembroke. There are a small number of scattered houses in the vicinity of the proposed Solar Park site. The closest of these is Nash Villa (located approximately 130 metres (m) south west of the proposed site boundary at the nearest point).
21. The location of the proposed Solar Park site is shown in ES Vol 3: Figure 1.1, and the site boundary (and indicative site layout) is shown in ES Vol 3: Figure 1.2. The proposed Solar Park site is centred at Ordnance Survey Grid Reference 201580, 203280. The proposed site comprises 3 fields (arable), covering a total area of approximately 13.84 hectares (ha). Further details regarding the agricultural activity across the site are provided within the Agricultural Assessment Report which is provided in separate documentation.
22. There are no public footpaths or bridleways that cross the proposed site. The nearest footpaths form the western site boundary. Further details of nearby public rights of way are provided in ES Volume 1 Chapter 8: Landscape and Visual.
23. 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 38 m Above Ordnance Datum (AOD) to approximately 25 m AOD.
24. The nearest landscape designation (or at least designation with landscape implications) is the Pembrokeshire Coast National Park, located approximately 120 m to the north of the proposed site. Further information on potential landscape and visual impacts is provided in ES Volume 1 Chapter 8 (Landscape and Visual).
25. The proposed Solar Park site is not located within any internationally, European or nationally designated ecological sites. The closest are the Pembrokeshire Marine / Sir Benfro Forol Special Area of Conservation (SAC) (approximately 1 km to the west at its nearest point) and the Milford Haven Waterway Site of Special Scientific Interest (SSSI) (approximately 870 m to the east and 1km to the west. Further information on ecology and ornithology is provided in Chapter 9 (Ecology and Ornithology).
26. There are no World Heritage Sites within 5 km of the proposed site. There is a Registered Park / Garden located approximately 510 m to the north east of the proposed site. There are no Scheduled Ancient Monuments within the proposed Solar Park site boundary. The closest Scheduled Ancient Monument is located approximately 1.5 km to the south. Further information on cultural heritage / archaeology is provided in ES Volume 1 Chapter 10 (Cultural Heritage / Archaeology).
27. 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. These roads are used frequently by large farm vehicles and HGVs.

1.5 The Proposed Development

28. The full details of the proposed development are set out in the ES and to avoid repetition are not replicated here in full. The key elements of the proposed Solar Park are as follows:

Table 1.1: Key Elements of Proposed Solar Park Project

Element of Proposed Scheme	Details
Approximate Number of PV Panels (PV Cells)	25,500
Panel Size	2210mm x 1200mm
Panel Angle	Up to 22 degrees
Number of Inverters	Up to 5
Number of Transformers	Up to 5
Inverter / Transformer Cabin Dimensions (m)	10.4 m (length) by 2.6 m (width), and 3.18 m (height).
Control Building Dimensions (m)	7 m (length) by 3 m (width), and 4 m (height).
Perimeter Fence (m)	2.5 m (height)
Electrical Connection	<p>The PV Cells will require interconnection within the proposed Solar Park site to Inverters that will convert the low voltage DC to low voltage AC. In turn, the Inverters will connect to Transformers that will convert the low voltage AC to higher voltage AC (33 kV) for export to the regional electricity grid.</p> <p>Electricity will be exported to the regional electricity grid via an underground cable to the existing Golden Hill 33 / 132 kV Substation located approximately 2.3 km to the south west. This is operated by NGED, the local distribution network operator. Details of the off-site connection works are provided in Chapter 16.</p>
Onsite Access Track	The onsite access track would be constructed from compacted stone or aggregate. The total length of the onsite access track will be approximately 865m.

Element of Proposed Scheme	Details
Temporary Site Compound / Laydown Area	The Temporary Site Compound / Laydown Area would be approximately 1600 m ² , and would include an area of hard standing / gravel which will house a temporary office and welfare facility (including a port-a-loo). This Compound / Area will also be used for the parking of staff vehicles and the storage of construction equipment / vehicles / materials. An additional HGV turning area will also be incorporated into the designated compound area as shown in ES Vol 3: Figure 6.6.

1.5.1 Project Layout

29. Throughout the development of the proposed Development design, WSE has sought to minimise the impact of the Solar Park, especially with regard to the impacts associated with landscape and visual amenity and ecology. Further information on how this was done is provided in ES Volume 1 Chapter 8.
30. Figure 1.2 of the Environmental Statement Volume 3 illustrates the proposed general site layout of the key elements as envisaged, subject to any minor micro-siting. These include: the PV panels, the inverter and transformer buildings, the control building and the proposed access track.

1.5.2 Site Access

31. The exact location of the PV panel and Inverter / Transformer manufacturers will not be known until the receipt of planning permission and award of the construction contracts. However, from the motorway network, access to the proposed Solar Park site would be achieved from the M4. Deliveries are anticipated to approach the site along the M4, A48, A40, A447, turning onto the access track to Lower Nash Farm, all of which are frequently used by large vehicles.
32. Access onto the proposed Solar Park site would be through an existing site access point located in the south west corner of the proposed site.

1.5.3 Construction of the Project

33. Following receipt of the planning permission and award of construction contracts, it is anticipated that it could take as little as 4 months to construct the Solar Park.
34. Full details of the construction works, phasing etc are included in the Environmental Statement but are not reproduced in this document to avoid duplication.
35. Construction working hours will be restricted to the following, with no working on Saturdays, Sundays or Bank Holidays:

Monday to Friday 08:00 to 18:00
36. Any deviations from these times will be agreed in advance with the Local Authority.

37. The principal activities during the construction of the Solar Park include:
- Constructing the limited site access road and site compound / laydown area (plus any other enabling works);
 - Installation of perimeter fencing;
 - Excavating and constructing the electrical buildings foundations / skid mounts;
 - Constructing and installing of the inverter and transformer / electrical buildings, and installation of PV panel support structures;
 - Transporting and assembling the panel mounting systems;
 - Mounting the PV panels on the mounting systems;
 - Installing the electrical collection system (cables etc);
 - Commissioning and energising the Solar Park; and
 - Site re-instatement and any enhancement measures.

2 Planning Policy Context

2.1 Introduction

38. This Section provides the planning policy context relevant to the development of the proposed Solar Park. This Section covers:

- The Planning Framework;
- National Planning Policy; and,
- Local Planning Policy.

2.2 The Planning Framework

39. The Planning and Compulsory Purchase Act 2004 requires that all planning decisions are 'plan led'. The Act also provides the statutory basis for the 'plan led' system and is particularly important in that it establishes a statutory purpose for planning, namely the achievement of sustainable development. Section 38(6) of the Act states that:

"...if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

40. In essence, any consideration which relates to the use and development of land is capable of being 'material'.

41. The Act also outlines in detail in Part 6 the requirements of the Welsh Government in terms of putting Planning Policy in place in terms of the "National Development Framework for Wales". Parts of the framework relevant to the proposed development are discussed further later in this document as appropriate.

2.3 National Planning Policy & Guidance

42. There are a number of documents that are relevant to the project in terms of national planning policy and guidance in Wales. These are addressed below and include:

- Future Wales: The National Plan (2040)
- Planning Policy Wales (edition 11, February 2021)
- Various Technical Advice Notes (TAN)

2.3.1 Future Wales: The National Plan 2040

43. The National Plan sets out where the Welsh Government think country should try to grow and the types of development needed over the next twenty years to help Wales be a sustainable and prosperous society. It also confirmed that the Welsh Government seeks to reach net zero by 2050.

44. In the introduction to the document the Government state.... *"We face a climate emergency which is actively changing our environment and directly affecting communities; we have an ecological emergency, where the behaviours and decisions of the human race are causing harm to the resilience of ecosystems and species; we have suffered the effects of a global health pandemic and must re-energise our economy in a sustainable way, demonstrating that we have learnt from previous excesses that have resulted in inequitable wealth and access to services. The Welsh*

Government will face these challenges and find the opportunities for a better Wales with every mechanism at our disposal. Our national development framework, in this context, is an important lever to deliver the change we need.”

45. With specific regard to climate change the plan states that.... *“It is vital that we reduce our emissions to protect our own well-being and to demonstrate our global responsibility. Future Wales together with Planning Policy Wales will ensure the planning system focuses on delivering a decarbonised and resilient Wales through the places we create, the energy we generate, the natural resources and materials we use and how we live and travel.*
46. Regarding Renewable Energy the document states..... *“Wales can become a world leader in renewable energy technologies. Our wind and tidal resources, our potential for solar generation, our support for both large and community scaled projects and our commitment to ensuring the planning system provides a strong lead for renewable energy development, mean we are well placed to support the renewable sector, attract new investment and reduce carbon emissions.”*
47. Naturally as a national level document the content is relevant mostly in broad terms. Of particular relevance to the Phoenix Solar Park project are the following policies which are replicated in full in Appendix A:
- Policy 17 – “Renewable and Low Carbon Energy and Associated Infrastructure”;
 - Policy 18 – Renewable and Low Carbon Energy Developments of National Significance
48. It is considered that the project is supported by these policies which require that projects do not give rise to unacceptable environmental impacts, something which is demonstrated by the various studies that are reported within the Environmental Statement.

2.3.2 Planning Policy Wales Edition 11 (2021)

49. The Planning Policy Wales (PPW11) edition 11 sets out the land use planning policies of the Welsh Government.
50. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales. PPW, the TANs, MTANs and policy clarification letters comprise national planning policy. These various support documents are already referenced where relevant in the
51. It contains land use planning policies for Wales and sets out the framework for Local Authorities to prepare their development plans and is a material consideration in the determination of planning applications.
52. The document makes significant references to the need to move to a low carbon, renewable energy-based economy in Wales and strongly recognises the issues associated with our changing climate.

53. It also sets a renewable energy target for Wales to generate 70 per cent of its electricity consumption from renewable energy by 2030, something that will require rapid deployment of projects such as the proposed Solar Park if it is to be achieved.
54. The document identifies the benefits of renewable and low carbon energy, as part of the overall commitment to tackle climate change and increase energy security recognising it to be of “paramount importance”. It goes on to say that:

“The planning system should:

- integrate development with the provision of additional electricity grid network infrastructure;*
- optimise energy storage;*
- facilitate the integration of sustainable building design principles in new development:*
 - optimise the location of new developments to allow for efficient use of resources;*
 - maximise renewable and low carbon energy generation;*
 - maximise the use of local energy sources, such as district heating networks;*
 - minimise the carbon impact of other energy generation; and*
 - move away from the extraction of energy minerals, the burning of which is carbon intensive.”*

55. With specific regard to renewable energy the document starts that: *“Local authorities should facilitate all forms of renewable and low carbon energy development and should seek cross-department co-operation to achieve this. In doing so, planning authorities should seek to ensure their area’s full potential for renewable and low carbon energy generation is maximised and renewable energy targets are achieved. Planning authorities should seek to maximise the potential of renewable energy by linking the development plan with other local authority strategies, including Local Well-being plans and Economic/ Regeneration strategies.*

.....In order to facilitate local and regional energy planning, local authorities must develop an evidence base (which can include LAEP) to inform the development of renewable and low carbon energy policies. Planning authorities should:”

- take into account the contribution their area can make towards the reduction of carbon emission and increasing renewable and low carbon energy production;*
- recognise that approaches for the deployment of renewable and low carbon energy technologies will vary;*
- identify the accessible and deliverable renewable energy resource potential for their area, including heat, and consider the likely utilisation of this resource over the plan period;*
- assess the social, economic, environmental and cultural impacts and opportunities arising from renewable and low carbon energy development;*
- take into account the cumulative impact of renewable and low carbon energy development and their associated infrastructure, for example grid connections;*
- identify criteria for determining applications for sites based on their installed capacity;*
- engage with the renewable energy development industry and consider the deliverability of schemes;*
- take into account issues associated with grid connection (see Grid Infrastructure section) and the transportation network; and*

- *consider local and strategic priorities for renewable energy.”*

56. It is clear PPW11 in principle strongly supports to fight to combat climate change through the uptake of renewable energy generation such as the proposed Solar Park.

2.3.3 Welsh Government – Technical Advice Notes

57. The Welsh Government has produced Technical Advice Notes (TANs) which should be read alongside the PPW11 document, both of which should be taken into account by Local Authorities when they are preparing development plans and determining planning applications.

58. TANs of relevance to the proposed Solar Park include:

- TAN 5 – Nature Conservation and Planning: The TAN describes how Local Authorities should have regard to the need to safeguard ecological characteristics (e.g. protected species). The proposed Solar Park is not predicted to have adverse impacts on habitats or protected species (ES Volume 1 Chapter 9 contains a detailed assessment).
- TAN 6 – Agriculture and Rural Development: This TAN outlines who Local Authorities should consider the quality of agricultural land as well as other agricultural aspects. The studies for the proposed Solar Park include an assessment of land quality (ES Volume 2 A.5.1). The reasons for the use of the site are discussed within the Agricultural Assessment Report (ES Volume 2 A.5.2)
- TAN 18 – Transport: TAN 18 provides guidance on the integration of transport and land use planning; integration between different types of transport; integration of transport policy with policies for the environment, education, social justice, health, economic development and wealth creation. ES Volume 1 Chapter 13 provides an assessment of the potential impacts of the development on the transport network.
- TAN 24 Historic Environment - The purpose of TAN 24 is to provide guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning and Listed Building applications.

2.3.4 Other guidance, policy and relevant material

59. There are a number of other documents that form part of planning policy guidance in Wales that could be considered relevant to the proposed solar park development. These include:

- Planning Implications of Renewable and Low Carbon Energy February 2011
- Designing for Renewable Energy in Wales
- Best and most versatile agricultural land and solar PV arrays – ministerial letter
- Well Being of Future Generations (Wales) Act 2015

Planning Implications of Renewable and Low Carbon Energy February 2011

60. In addition to Planning Policy Wales, the Welsh Government Practice Guidance: Planning Implications of Renewable and Low Carbon Energy February 2011 is

worthy of note. Whilst somewhat dated it summarises the potential impacts of solar parks and possible options for mitigation and enhancement measures as part of any projects based in Wales. Specifically, it highlights the need to address the following issues as appropriate.

- Landscape and visual;
- Glint and glare;
- Ecology;
- Historic environment;
- Agriculture;
- Hydrology and flood risk; and
- Cumulative impacts.

Designing for Renewable Energy in Wales 2023

61. Designing Renewable Energy in Wales was published in November of 2023. The publication aims to set out design guidance for members of the public, developers and decision makers in relation to proposals for large-scale on-shore wind and solar energy generation developments.
62. The document includes a general commentary on issues to consider in the development process including advice to where possible:
 - Avoid unacceptable environmental impacts on local communities through the design processes;
 - Maximise benefits to local communities;
 - Avoid negative environmental impacts on nature and wildlife;
 - Enhance the ecological diversity of the site to provide a net benefit;
 - Use of highest quality emerging new technology;
 - Sustainable construction;
 - Make meaningful changes to the landscape through design; and
 - Site design and wider impacts
63. Also included in the document in section 6 is a summary of design factors that might be taken into consideration during the development of a solar project.

Best and most versatile agricultural land and solar PV arrays – ministerial letter

64. In a letter dated 1 March 2022 the Minister for Climate Change stated that Local Planning Authorities are required to consult with the Welsh Government before granting planning permission for any proposals which do not accord with the Development Plan and would involve the loss (both permanent and temporary) of 20 hectares or more of BMV land. This includes losses which are less than 20 hectares but likely to lead to further losses amounting cumulatively to 20 hectares or more.
65. The nature of the development is such that it does not trigger the relevant threshold for loss of BMV land and therefore there is no requirement for the Welsh Government to be consulted.

Well Being of Future Generations (Wales) Act 2015

66. The Act places a duty on public bodies to place the principles of sustainability and sustainable development at the heart of its decision-making processes. It also makes it clear that the global effort to combat climate change is of critical importance in decision making. Its objectives can be summarised as follows:

“A Prosperous Wales

- *Promoting resource-efficient and climate change resilient settlement patterns which minimise land take and urban sprawl, especially through the reuse of suitable previously developed land and buildings, wherever possible avoiding development on greenfield sites;*
- *Play an appropriate role to facilitate sustainable building standards;*
- *Play an appropriate role in securing the provision of infrastructure to form the physical basis for sustainable communities;*
- *Support initiative and innovation and avoid places unnecessary burdens on enterprises so as to enhance the economic success of both urban and rural areas, helping businesses to maximise their competitiveness; A Resilient Wales*
- *Contributing to the protection and improvement of the environment, so as to improve the quality of life, and protect local and global ecosystems;*

A Healthier Wales

- *Contribute to the protection and, where possible, the improvement of people’s health and wellbeing as a core component of achieving the well-being goals and responding to climate change; A More Equal Wales*
- *Promoting access to, inter alia, employment, shopping, education and community facilities and open and green space, maximising opportunities for community development and social welfare;*
- *Promote quality, lasting, environmentally-sound and flexible employment opportunities;*
- *Respect and encourage diversity in the local economy;*

A Wales of Cohesive Communities

- *The location of development so as to minimise the demand for travel, especially by private car;*
- *Fostering improvement to transport facilities and services which maintain or improve accessibility to services and facilities, secure employment, economic and environmental objectives, and improve safety and amenity.*
- *Fostering social inclusion by ensuring that full advantage is taken of the opportunities to secure a more accessible environment for everyone that the development of land and buildings provides. This includes helping to ensure that the development is accessible by means other than the private car;*

A Wales of Vibrant Culture and Thriving Welsh Language

- *Helping to ensure the conservation of the historic environment and cultural heritage;*
- *Positively contribute to the well-being of the Welsh language; A Globally Responsive Wales*

- *Support the need to tackle the causes of climate change by moving towards a low carbon economy.”*

67. The importance of the policy was highlighted by the Welsh government in the form of a letter from the Minister for Natural Resources Letter to Planning Lead Members, Chief Planning Officers and Planning Inspectorate Wales dated 15th March 2016
68. In the letter the Minister states:

“When taking decisions on local planning policies and individual development management decisions consideration should be given to the overall context of helping to tackle climate change and delivering the sustainable development duty placed on all public bodies by the Well-being of Future Generations (Wales) Act. This needs to happen for all renewable energy and low carbon technologies and at all scales from nationally significant projects to community and individual building scale schemes.

Our planning policies in Planning Policy Wales (PPW) are clear that the planning system should support the transition to a low carbon society and that local planning authorities should facilitate the development of all forms of renewable and low carbon energy. In addition, PPW states that the economic benefits associated with a proposed development are understood and these are given appropriate consideration in the decision-making process.

I appreciate that visual and amenity impact on surrounding communities and properties is an important issue (and policies are in place to protect against unacceptably adverse impacts) and that discussions of this nature can become quite emotive during the planning process.

However planning decisions need to be taken in the wider public interest and in a rational way, informed by evidence, where these issues are balanced against other factors. At the larger scale, the new Developments of National Significance (DNS) system, introduced on 1 March will consider these issues on a strategic level for energy projects, taking into account policies in development plans and Planning Policy Wales.”

2.4 Local Planning Policy

2.4.1 Pembrokeshire Local Development Plan

69. The proposed Solar Park site falls within the jurisdiction of the Pembrokeshire County Council. Therefore, at the local level relevant planning documentation is that contained in the Pembrokeshire County Council Local Development Plan (LDP) which was adopted in February 2013. A process has been underway for some time to adopt a new plan however this has been significantly delayed and at the time of writing no information is available on the timeline for the pathway to adoption.
70. For the purposes of this report, it is assumed that it is the existing LDP policies that carry the most weight. However we note that the deposited plan “Local Development Plan 2 – Planning Pembrokeshire’s Future” does include positive commentary on uptake and adoption of renewable energy. For example the council commit to seeing to “permit a minimum additional 9MW per annum renewable energy capacity over the plan period.”

71. From a review of the proposals maps contained within the LDP the only policy which is directly applicable to the site itself is Hard Rock Resource Policy GN22. However, there are a series of other policies that re considered to be relevant more generally to the project site. The list of policies considered to be relevant include:
- SP 1 Sustainable Development
 - SP 11 Waste
 - SP 16 The Countryside
 - GN.1 General Development Policy
 - GN.2 Sustainable Design
 - GN.3 Infrastructure and New Development
 - GN.4 Resource Efficiency and Renewable and Low-carbon Energy Proposals
 - GN.10 Farm Diversification
 - GN.22 Prior Extraction of the Mineral Resource
 - GN.37 Protection and Enhancement of Biodiversity
 - GN.38 Protection and Enhancement of the Historic Environment
72. The various policies outlined above are replicated in the table included in Appendix A of this document along with a commentary on where the policy is relevant to the project and where additional information is provided in the various documents that accompany the planning application:
73. In addition to the core LDP there are relevant local council guidance notes and baseline documents as follows:
- Pembrokeshire County Council Landscape Character Assessment (Final for Consultation), May 2022.
 - Pembrokeshire Coast National Park Authority, SPG Landscape Character Assessment 22 June 2011.
 - Renewable Energy SPG (Oct 2016).

Renewable Energy Supplementary Planning Guidance (SPG) 2016

74. The Renewable Energy Supplementary Planning Guidance notes the following as being relevant to solar park planning applications. The EIA has addressed considerations where relevant to the project and its site.

“Application Considerations: Pre-Application considerations +plus:

- *Equipment detail & design (expected output, equipment typology, colour, finish, etc)*
- *Scale - Landscape context & character (LANDMAP, Landscape Management Plan)*
- *Landscape sensitivity (PCNPA, Landscapes of Historic Importance, statutory designations, etc)*
- *Quality & Grading of Agricultural Land*
- *Visual Impact Assessment, sightlines, photomontages (consider the impact on the skyline, important vistas, landscape openness / vegetation / tree cover)*

- *Glint/Glare & consideration of night time lighting for security purposes*
- *Sensitivity of receptors – Local resident / tourists / business +/-*
- *Social & economic impact (business impact/ diversification/ local community benefits)*
- *Natural environment, ecology & ornithology (Ecological Management Plan)*
- *Hydrology (Drainage, Flood Consequences Assessment, etc)*
- *Telecommunications & HSE constraints, including aviation / radar / rail, MOD constraints, etc*
- *Electronic communication interference*
- *Pollution considerations*
- *Access information, including a Construction Method Statement & Management Plan & a Transport Management Plan where appropriate*
- *Screening / EIA*
- *AA / HRA*
- *Cumulative Impact considerations, including the relationship to other solar & consented renewable schemes, and to other large structures within the landscape context, taking care to avoid cluttering or visual discord. Cumulative impact can also include the impact on the natural and historic environment, etc”*

3 Key Planning Considerations

75. As noted above, there are several policies at a local level which have been identified as being relevant to the proposals and are therefore important to address in the determination of the planning application for the proposed Solar Park. Whilst these policies have individually been discussed in the table, which is presented in Appendix A of this document, this section considers them together within the context of other broader issues. National policies by their nature are broader and are discussed as required in the text below.

3.1.1 Climate Change

76. Both the UK and Welsh Governments have declared climate emergencies in response to the threat of global climate change as have Pembrokeshire County Council in May 2019. In their meeting where Pembrokeshire's climate emergency was declared county councillors also stated a desire for the council to become a net zero carbon local authority as early as 2030.
77. The declaration of climate emergencies is of course just the latest policy position in a long pattern of governments and council putting in place the measures to combat climate change and the greenhouse gases that drive that change.
78. The imperative to switch to a low carbon economy and tackle climate change has been reinforced time and again including, as discussed in Section 2, by the Minister for Natural Resources who emphasised the need to reflect the "Well-being of Future Generations (Wales) Act" in decision making on renewable energy projects.
79. The Phoenix Solar Park would make a significant contribution to the fight against the emission of greenhouse gases through the provision of clean, renewable energy providing on average 3296 homes with electricity.
80. It is considered that there is a clear policy commitment at all levels of government to combatting the emission of greenhouse gases that lead to climate change. This is a significant material consideration that favours the Phoenix Solar Park being awarded planning consent.

3.1.2 Electricity Supply Benefits

81. The use of renewable energy, such as that which would be generated from the proposed Solar Park, will add to the diversity of the UK electricity generation sector helping to maintain the reliability of supplies and represents an inexhaustible supply. Renewable energy also has advantages relating to slowing the depletion of finite fossil fuel reserves. North Sea oil and gas supplies have meant the UK in more recent times has been self-sufficient in energy but this cannot be maintained, leaving the country potentially vulnerable to price fluctuations and interruptions to supply caused by regulatory failures, political instability or conflict in other parts of the world.
82. The issues associated with security of supply have been made obvious in recent years. The Covid-19 Pandemic and the war in the Ukraine which have shown just how vulnerable the UK is to disruption of its non indigenous energy supply. The move to domestic renewable energy is key to protecting the UK from future economic threats.

83. The Solar Park will also help to reduce the transmission losses associated with the transfer of electricity along long lengths of transmission lines from conventional power stations. As the proposed project will be “embedded generation” (i.e. generating electricity directly into the local power distribution network) it reduces the distance the electricity travels and reduces these small losses of power. By contrast, energy from large power stations has to be transmitted on high voltage power lines and travels long distances before point of use. The Solar Park will therefore contribute towards the efficiency of the UK distribution system and further reduce the harmful emissions generated by thermal power plant.
84. There are a number of annual average UK household electricity consumptions quoted by various credible sources. BEIS now estimates the average consumption to be below 4,000 kWh with average consumption in 2019 being about 3,731 kWh. It can be calculated using the 2019 figure that the proposed Solar Park will provide up to 3,296 households with renewable energy annually.

3.1.3 Uptake of Renewable Energy

85. There are international and national targets for both the development of renewable energy projects and the reduction of greenhouse gas emissions. If these targets are to be achieved, a quick, sustained, and substantial acceleration is needed in the development of renewable energy projects, with solar energy making an important contribution.
86. These targets exist not only to combat climate change but also to help ensure that the UK becomes less dependent of energy sources overseas and that the generation of electricity becomes more localised adding to its sustainability.
87. These targets are backed up by a wealth of national and local policy that support the active uptake on renewable energy. At a local level the Local Development Plan includes a policy in the form of GN4 that strongly supports development which enable the supply of renewable energy through environmentally acceptable solutions.
88. It is considered that the proposed Solar Park has the potential to help the Council and the Country meet renewable energy targets whilst avoiding the installation of relatively more intrusive renewable energy projects, such as onshore wind farms.

3.1.4 Contribution towards Sustainable Development

89. Renewable energy projects, such as the proposed Solar Park, provide local supplies from green, carbon-neutral sources. These projects are very much a demonstration of sustainable development in action. The development of renewable energy projects is essential in contributing to national targets for renewable energy generation.
90. In addition, through displacing electricity currently generated by fossil-fuel fired power plants, the proposed Solar Park will avoid the emission of pollutants (including CO₂, SO₂ and NO_x) associated with such power plants.
91. Solar Parks also represent embedded electricity generation, feeding renewable energy into the grid, invariably at closer to the point of use, therefore often removing the need for extensive additional transmission lines and reducing the transmission losses associated with transporting electricity over longer distances.

92. The undoubted benefits of electricity generated by renewable energy projects embedded in the local grid network, such as the proposed Solar Park, is a further highly significant material consideration.
93. During operation, the land will be available for use around the PV panels, with sterilised areas of land essentially being the electrical and inverter buildings. Also, when compared to conventional power stations, solar parks are easily and quickly decommissioned, and any visual impact is totally reversible.

3.1.5 Economic impacts / benefits:

94. The development of renewable energy schemes presents an economic opportunity both nationally and at a regional and local level. It is estimated by the government in 2017 that £79.6 billion turnover in the UK economy was generated directly and indirectly by businesses active in the low carbon and renewable energy economy.
95. Solar projects such as that proposed by WSE can help stimulate business investment in a sector with enormous growth potential.
96. It is considered that the project will have a beneficial impact with regard to socio-economics in the wider area. The proposed development represents a total investment of the order of £6 million in isolation, a proportion of which will be spent in the local area, primarily on civil and electrical contractors. WSE will encourage the contractor who will construct the project to use locally sourced materials and locally based contractors as part of their proposals so as to maximise the benefit to the local economy.
97. The potential for investment in new and emerging renewable energy technologies must also be seen against the potential impacts of not taking action to combat climate change. Climate change could perhaps reduce global GDP by 5 per cent year on year 'now and forever' whilst the costs associated with combating global climate change could be as little as 1 per cent of global GDP (Stern Report 2005). The risks to the UK economy such predictions are correct are plain to see and it is considered that it is through projects such as the proposed Solar Park that this threat can be combated.

3.1.6 Appropriateness of the Project and the Proposed Site

98. In terms of the appropriateness of the proposed site, the application for Planning Permission follows a process including site selection and initial desktop technical feasibility studies. These are documented within ES Volume 1 Chapter 5: Site Selection and Consideration of Alternatives.
99. This process identified the proposed Solar Park site as being technically suitable for the development of a 9.99 MW Solar Park. It is considered that there are a number of advantages of the proposed site that make it suitable for the development of a Solar Park. Amongst others, these advantages include:
 - Its location in an area of the UK that has a high level of solar radiation and good levels of direct sunlight;

- The availability of land of a sufficient area to accommodate a 9.99 MW Solar Park; and,
- Its proximity to the regional electricity grid such that significant off-site works (with the associated environmental and commercial costs) are not required.

3.1.7 Limited Period of Operation

100. Compared to other power generation technologies, Solar Parks can be easily and economically decommissioned and removed at the end of their economic life (typically expected to be about 40 years). Following decommissioning and removal, the site can then be restored close to its original condition such that there would be little (and in some cases no) trace that a Solar Park had existed.
101. The limited period of operation, and ease of decommissioning, is therefore considered to be an additional favourable material consideration.

3.1.8 Environmental impacts

102. Environmental policies and commentary are included across all parts of UK Government, Welsh Government and Local County Council documentation. The Pembrokeshire County Council Local Development Plan contains, as might be expected, the most locally relevant content.
103. For ease of reading the various environmental and technical issues are addressed below under the relevant subheadings. Appendix A of this document provides a policy by policy review.

3.1.8.1 Landscape and visual, including Glint and Glare

104. Due to the nature of solar parks the principal impact tends to be visibility, and this must be seen in the context of the wider economic, environmental and social benefits. A Full Landscape and Visual Impact Assessment (LVIA) has been undertaken for the proposed development. The full report is available in ES Volume 1 Chapter 8.
105. The report concluded that the proposed solar park would not lead to unacceptable impacts that would be in any way significant in environmental assessment terms. It noted that there would be a temporary loss of farmland that would become pasture once the physical construction works had been completed. Field boundaries are proposed to be strengthened through additional planting and managed to grow to a height of 4 m to help mitigate views into the site.
106. Visual impacts as is the case for most solar parks were highlighted as being more pronounced the closer viewers were to the site with the assessment including a detailed analysis of impacts from a variety of local receptors. However, no impacts were considered to be significant in EIA terms.
107. Impacts on Landscape Character were not predicted to be significant whilst impacts to the National Park would be slight to negligible in the long term. The report also highlighted that the long term yet temporary nature of the proposals, meant that potential operational effects would be reversible. The residual effects on the landscape fabric would therefore be beneficial as the improvements to hedgerows to be retained would be permanent.

108. With specific regard to Glint and glare from the proposed site a detailed computer analysis was undertaken for the site. It found that the existing screening by vegetation, buildings and topography will eliminate glint effects at the majority of the receptor points analysed. In addition, potential residual glint effects on residential properties, roads, public rights of way, cultural heritage receptors and selected viewpoints are not considered to be significant and therefore no additional mitigation measures are recommended or required.
109. In terms of policy GN1 supports development where it does not result in a significant detrimental impact on amenity. With regard to visual impacts and amenity more generally the EIA has not found that there would be any significant impacts and therefore the project is considered to be supported by the policy.

3.1.8.2 Ecology and Ornithology

110. Full details of the Ecological and Ornithological assessments undertaken for the project site are included in ES Volume 1 Chapter 9.
111. No significant effects are anticipated for designated sites, habitats, or species as a result of the proposed solar park. Similarly, there are not predicted to be any unacceptable impacts with regard to onsite ecology or ornithology receptors.
112. The habitat creation/enhancement measures and changes to habitat management, as a result of the proposed development, are likely to see a net gain in biodiversity; this is consistent with local and national planning policies relating to nature conservation.
113. In terms of policy the LDP policy GN1 details the need to protect the natural environment including protected habitats and species whilst Policy GN37 requires wherever possible biodiversity enhancement. Policy GN37 also seeks to protect 'protected species' or their habitats and the integrity of other habitats, sites or features of importance to wildlife and individual species.
114. It is considered that the assessments undertaken have demonstrated that the project will not impact in any significant way on off-site or on-site ecology and will not impact on protected species. Therefore, the project is considered to be fully compliant with the relevant policy.

3.1.8.3 Cultural Heritage / Historic Environment

115. In terms of cultural heritage / archaeological designations, ES Volume 1 Chapter 10 presents the results of an Archaeological Desk Based Assessment, a Geophysical Survey, a programme of Trial Trenching and a Settings Impact Assessment (SIA). This is summarised in as an Archaeological Impact Assessment in the document.
116. The assessment work concluded that with proposed mitigation the proposed Solar Park will have no significant impacts on any cultural heritage / archaeological features including listed buildings and their settings. Onsite archaeology would benefit to a minor extent by the cessation of ploughing onsite whilst there would be a short-term minor adverse impact to the Church of St Mary that would be briefly impacted on by construction noise.

- 117. The LDP addresses cultural heritage / archaeological interests under Policy GN38 asking that projects demonstrate protection or enhancement for the character and integrity of such assets.
- 118. The assessment has demonstrated there is potential for in situ protection for onsite assets and that off-site receptors will not be impacted on in a significant way satisfying the policy requirements.
- 119. The project is considered to be fully compliant with the relevant policies.

3.1.8.4 Noise

- 120. Solar parks are inherently quite due to their nature, with no moving parts etc. Construction work can create noise however construction works are only undertaken within hours defined by any planning consent and for a relatively short duration.
- 121. The Noise assessments undertaken for the project and reported in ES Volume 1 Chapter 11 demonstrate that there will be no significant impacts due to noise on any sensitive receptors in the construction or operational phases.
- 122. The project therefore is considered to satisfy the requirements for noise protection afforded in the LDP by policy GN1.

3.1.8.5 Land, Geology, Hydrology, Hydrogeology and flood risk

- 123. An assessment was undertaken as part of the EIA regarding impacts to hydrology, hydrogeology, flood risk and ground conditions. The development was found to have minor to negligible significance reducing to negligible with the implementation of best practice mitigation measures.
- 124. With specific regard to planning policy the only policy designation which covers the site as noted earlier in this document is GN22. The policy covers extensive areas of the countryside in the county. It is concerned with the extraction of mineral recourse and states;
- 125. *"Where new development is permitted in an area of mineral resource, prior extraction of any economic reserves of the mineral must be achieved, wherever appropriate in terms of economic feasibility and environmental and other planning considerations, prior to the commencement of the development."*
- 126. The site is not proposed for any mineral extraction and the installation of panels is temporary and reversable in the longer term. The project is therefore not considered to be contrary to the policy.
- 127. Regarding flood risk the project was found with suitable mitigation not to give rise to increased risk of flooding on or off site.
- 128. In terms of the use of the proposed site the reasons for this are set out in detail in the ES Volume 1 Chapter 5: Site Selection and Consideration of Alternatives which included a thorough analysis of alternatives.
- 129. The project is considered to be fully compliant with the relevant policies.

3.1.8.6 Cumulative Environmental impacts

130. Wherever relevant the EIA has examined the potential for cumulative environmental impacts. In no cases were there found to be significant impacts that would result from the development or go against the various policies of the LDP.

3.1.8.7 Residential Amenity

131. There are many factors that influence residential amenity which is protected by policy GN1 of the LDP. These are discussed where relevant above and more fully in the Environmental Statement.
132. Various studies undertaken as part of the EIA have found no significant potential to impact on local amenity. This includes visual impacts, as well as noise / vibration, and air quality impacts.
133. The project is considered to be fully compliant with the relevant policies.

3.1.8.8 Traffic and Infrastructure

134. As part of the development process, WSE has sought to ensure that there is appropriate and safe vehicular access to the proposed Solar Park site. Further information is provided in ES Volume 1 Chapter 13 Traffic and Infrastructure.
135. No detrimental impact to the local highway network is envisaged. The site is close to a main road from which relatively easy access is achieved. The construction phase will be relatively short and will not unduly impact on other road users. In the operational phase visits to and from site will be minimal.

3.1.8.9 Local opinion

136. Local opinion can be viewed as a material factor in considering planning applications. Previous consultation with local residents showed majority support from those who responded to the consultation.

4 Summary and Conclusion

137. The proposed Solar Park is compliant with the higher-level requirements of the relevant national planning policy (including the National Policy Statements and the National Planning Policy Framework). Taken together, the objectives and policies within this national planning policy is considered to support and indeed encourage the development of renewable energy projects, such as the proposed Solar Park, where such projects do not have an unacceptable impact on their surrounding environment.
138. Furthermore, the proposed Solar Park is compliant with the requirements of the relevant policies of the Pembrokeshire County Council LDP. These policies relate to (generally) to spatial development and (specifically) to the impact of development on the surrounding environment. The assessment documented in the Environmental Statement and supporting documentation concludes that the proposed Solar Park will have no significant environmental impacts.
139. Therefore, due to the need for the development of renewable energy projects and its clear compatibility with both national and local planning policy, it is considered that the proposed Solar Park is an acceptable proposal.

Appendix A: Schedule of Planning Policies & Commentary

Appendix A: Schedule of Planning Policies & Commentary

This Appendix provides a schedule of the planning policies identified in Section 3 as being relevant to the project. Plan Policies are reproduced word for word however Plan / Proposals Maps are not reproduced with internet links provided to these are appropriate should readers of this Environmental Statement wish to reference them.

The National Plan 2040

Policy	Policy Text	Commentary
Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure	The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs. In determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency. In Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in policy 18. Applications for large-scale wind and solar will not be permitted in National Parks and Areas of Outstanding Natural Beauty and all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment. Proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities. New strategic grid infrastructure for the transmission and distribution of energy should be designed to	<p>The proposed development is supported by the policy which seeks to significantly increase the uptake of renewable energy. The project is outside any AONB or National Park and impacts to such designations have been considered in the various support studies and found to be acceptable.</p> <p>As required by the policy the net benefits of the proposed development are detailed in full in the supporting planning documentation.</p>

Policy	Policy Text	Commentary
	<p>minimise visual impact on nearby communities. The Welsh Government will work with stakeholders, including National Grid and Distribution Network Operators, to transition to a multi-vector grid network and reduce the barriers to the implementation of new grid infrastructure.</p>	
Policy 18 – Renewable and Low Carbon Energy Developments of National Significance	<p>Proposals for renewable and low carbon energy projects (including repowering) qualifying as Developments of National Significance will be permitted subject to policy 17 and the following criteria:</p> <ol style="list-style-type: none"> 1. outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty); 2. there are no unacceptable adverse visual impacts on nearby communities and individual dwellings; 3. there are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and appropriate compensatory measures have been secured); 4. there are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species; 	<p>In accordance with the policy the project is located outside AONB / National Park controlled area and does not have an unacceptable impact on the setting of such designations or to the surrounding landscape.</p> <p>It is considered after carefully studies that there are no impacts that would be unacceptably adverse to communities or nearby dwellings. This is demonstrated by the various EIA and other studies.</p> <p>There are no impacts to international designations such as RAMSAR sites or to ecology sites. What is more the proposals allow for net benefits to biodiversity during the lifetime of the project.</p> <p>Assessments have demonstrated that there are no significant impacts to buildings that are culturally significant.</p> <p>The planning application includes details of the transportation of materials to and from site and highlights that no significant issues will be encountered in this regard</p>

Policy	Policy Text	Commentary
	<ol style="list-style-type: none"> 5. the proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity; 6. there are no unacceptable adverse impacts on statutorily protected built heritage assets; 7. there are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance; 8. there are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA-7T); 9. there are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation; 10. the proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources; 11. there are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration. The cumulative impacts of existing and consented renewable energy schemes should also be considered. 	<p>There are plans included that detail the decommissioning process.</p>

Pembrokeshire LDP

Policy		Content	Comments
SP 1	Sustainable Development	All development proposals must demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised.	<p>As discussed in the main document the project by its very nature represents sustainable development and therefore it is felt the policy strongly supports the proposed development.</p> <p>The project once operational will generate clean, renewable electricity that will be fed into the local grid network reducing the need for generation by more polluting power plant. It will do so whilst inputting electricity to the grid closer to areas of demand therefore reducing transmission losses across the network.</p> <p>More generally the project will help the UK reduce its energy imports and meet its renewable energy and climate change goals.</p> <p>A series of associated environmental benefits have also been identified such as habitat improvements / biodiversity enhancement measures that will be an added benefit of the development.</p> <p>From an economic perspective it will generate economic activity in the local areas in the construction and to a lesser extent in the operational phases. The project will also pay business rates to the local authority.</p>
SP 11	Waste	Production of waste and its impact on the environment will be minimised and the use of waste as a resource maximised, through re-use,	Waste produced will be mostly associated with the construction phase and will be minimal as detailed within ES Volume 1 Chapter 15. Detailed plans will

Policy		Content	Comments
		recovery for materials or energy and, where this cannot be achieved, safe disposal, using the best practicable environmental option.	be put in place managing waste and where practical eliminating it. This will be achieved through the implementation of the Construction and Environmental Monitoring Plan (CEMP) (doc ref BL009).
SP 16	The Countryside	<p>The essential requirements of people who live and work in the countryside will be met whilst protecting the landscape and natural and built environment of Pembrokeshire and adjoining areas. Development which minimises visual impact on the landscape and relates to one of the following will be promoted:</p> <ol style="list-style-type: none"> 1. Enterprises for which a countryside location is essential; 2. Opportunities for rural enterprise workers to be housed in suitable accommodation that supports their employment; and 3. The re-use of appropriate existing buildings. 	<p>Policy SP 16 is somewhat relevant to the project, mostly due to its setting in the countryside. It is felt that the project has demonstrated that the visual impact associated with the project is acceptable when the wider benefits are considered. This is particularly the case when Landscape enhancement / mitigation measures are included.</p> <p>The site alternatives study has shown that a countryside location is necessary to house a project of the scale required to generate 9.99 MW of renewable energy.</p>
GN.1	General Development Policy	<p>Development will be permitted where the following criteria are met:</p> <ol style="list-style-type: none"> 1. The nature, location, siting and scale of the proposed development is compatible with the capacity and character of the site and the area within which it is located; 	<p>As per the policy the various points are addressed here in numerical order.</p> <ol style="list-style-type: none"> 1. The site selection study has demonstrated the need for the project to be sited in the proposed location. Of relevance to this point is the landscape character impacts of the proposed solar park. The LVIA has examined the capacity of the landscape to

Policy	Content	Comments
	<ol style="list-style-type: none"> 2. It would not result in a significant detrimental impact on local amenity in terms of visual impact, loss of light or privacy, odours, smoke, fumes, dust, air quality or an increase in noise or vibration levels; 3. It would not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park and neighbouring authorities; 4. It respects and protects the natural environment including protected habitats and species; 5. It would take place in an accessible location, would incorporate sustainable transport and accessibility principles and would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network; 6. Necessary and appropriate service infrastructure, access and parking can be provided; 7. It would not cause or result in unacceptable harm to health and safety; 	<p>house the proposed development and found no significant impacts in EIA terms.</p> <ol style="list-style-type: none"> 2. Various studies undertaken as part of the EIA have found no significant potential to impact on local amenity. This includes visual impacts, as well as noise / vibration, and air quality impacts. 3. Impacts to the nearby National Park have been considered in terms of its Landscape Character. Again no significant impacts were identified, largely due to the topography of the area. 4. The EclA found that there would be no significant impacts to ecology with the potential for longer term biodiversity enhancements as a result of the scheme. 5. No detrimental impact to the local highway network is envisaged. The site is close to a main road from which relatively easy access is achieved. The construction phase will be relatively short and will not unduly impact on other road users. In the operational phase visits to and from site will be minimal. 6. All necessary infrastructure would be on site with no impacts away from the proposed development. 7. There are no parts of the project that would pose an unacceptable risk to health and safety. Full H&S measures will be adopted onsite during the construction and operational phases.

Policy		Content	Comments
		<ol style="list-style-type: none"> 8. It would not have a significant adverse impact on water quality; and 9. It would neither contribute to the coalescence of distinct settlements nor create or consolidate ribbon development. 	<ol style="list-style-type: none"> 8. There will be no impacts to water quality. 9. The development would not result in coalescence of settlements.
GN.2	Sustainable Design	<p>Development will be permitted where relevant criteria are met:</p> <ol style="list-style-type: none"> 1. It is of a good design which pays due regard to local distinctiveness and contributes positively to the local context; 2. It is appropriate to the local character and landscape/townscape context in terms of layout, scale, form, siting, massing, height, density, mix, detailing, use of materials, landscaping and access arrangements / layout; 3. It incorporates a resource efficient and climate responsive design through location, orientation, density, layout, land use, materials, water conservation and the use of sustainable drainage systems and waste management solutions; 4. It achieves a flexible and adaptable design; 	<p>As per the policy the various points are addressed here in numerical order.</p> <ol style="list-style-type: none"> 1. The design of the park has gone through a series of iterations to ensure that its impact is reduced to the extent possible. Features are included to enhance onsite landscaping. 2. The site selection study has demonstrated the need for the project to be sited in the proposed location. Of relevance to this point is the landscape character impacts of the proposed solar park. The LVIA has examined the capacity of the landscape to house the proposed development and found no significant impacts in EIA terms 3. By its nature the solar park is climate responsive. Sustainable drainage and other such features are included in the design also. 4. The project complies with bullet point 4 to the extent that it is relevant. 5. Part 5 is of limited relevance to the development.

Policy		Content	Comments
		<ol style="list-style-type: none"> 5. It creates an inclusive and accessible environment for users that addresses community safety; 6. It provides a good quality, vibrant public realm that integrates well with adjoining streets and spaces and 7. It contributes to delivering well designed outdoor space with good linkages to adjoining streets, spaces and other green infrastructure. 	<ol style="list-style-type: none"> 6. Part 6 is of limited relevance to the development. 7. Part 7 is of limited relevance to the development.
GN.3	Infrastructure and New Development	<p>Where development generates a directly related need for new or improved infrastructure, services or community facilities and this is not already programmed by a service or infrastructure company, then this must be funded by the development, and:</p> <ol style="list-style-type: none"> 1. Related in scale and kind to the development; and 2. Provided on site wherever appropriate. In exceptional circumstances contributions may be made to the provision of facilities elsewhere, provided their location can adequately service the development. The timely provision of directly related infrastructure, services and community facilities shall be secured by planning condition(s), the seeking of planning obligation(s) by negotiation, and/or by any other agreement or undertaking. 	<p>Whilst the title of the policy suggests that it would be relevant given the project represents “Infrastructure and New Development” it is not considered that any of the specific content reflects the nature of a solar park. As such no further commentary is provided.</p>

Policy	Content	Comments
	<p>The viability of a development will be a key consideration when securing planning obligations and dispensation may be allowed where these requirements cannot be supported by land values.</p> <p>Measures necessary to physically deliver a development and ensure that it is acceptable in planning terms will be required in the first instance. Where appropriate contributions may be sought for a range of purposes, including:</p> <ol style="list-style-type: none"> 1. Affordable housing 2. Recreational and Amenity Open Space 3. Sustainable Transport Facilities 4. Education 5. Community Facilities, including libraries, 6. Regeneration 7. Waste 8. Renewable and low carbon energy 9. Biodiversity <p>In the event that viability considerations indicate that not all the identified contributions can reasonably be required, priority contributions will be determined on the basis of the individual circumstances of each case. In the case of housing developments, priority will be given to affordable housing unless there is an</p>	

Policy		Content	Comments
		overwhelming need for the available contribution, in whole or in part, to be allocated for some other appropriate purpose/s.	
GN.4	Resource Efficiency and Renewable and Low-carbon Energy Proposals	Development proposals should seek to minimise resource demand, improve resource efficiency and seek power generated from renewable resources, where appropriate. They will be expected to be well designed in terms of energy use. Developments which enable the supply of renewable energy through environmentally acceptable solutions will be supported.	The project is supported by the policy which seeks to promote power being generated from renewable energy sources.
GN.10	Farm Diversification	<p>Diversifying the range of economic activities on a farm will be permitted where the following criteria are met:</p> <ol style="list-style-type: none"> 1. The proposed use helps to support the continued agricultural operation of the farm; 2. If a new building is justified it should be sited in or adjacent to an existing group of buildings; and 3. If a retail use is proposed the scale and scope will not harm the vitality and viability of retail facilities in any nearby settlements, or undermine the retail hierarchy. 	<p>The policy has some relevance to the proposed development. The solar park will help the financial sustainability of ongoing farming at the site.</p> <p>Farmland will not be lost to production but will switch to livestock (sheep) farming which will take place between the panels.</p> <p>After the operational lifetime of the solar park is over the land will fully return to farmland.</p>
GN.22	Prior Extraction of	Where new development is permitted in an area of mineral resource, prior extraction of any economic reserves of the mineral must be	The site is not proposed for any mineral extraction and the installation of panels is temporary and reversable in the longer term. The project is

Policy		Content	Comments
	the Mineral Resource	achieved, wherever appropriate in terms of economic feasibility and environmental and other planning considerations, prior to the commencement of the development.	therefore not considered to be contrary to the policy.
GN.37	Protection and Enhancement of Biodiversity	All development should demonstrate a positive approach to maintaining and, wherever possible, enhancing biodiversity. Development that would disturb or otherwise harm protected species or their habitats, or the integrity of other habitats, sites or features of importance to wildlife and individual species, will only be permitted in exceptional circumstances where the effects are minimised or mitigated through careful design, work scheduling or other appropriate measures.	The Ecological Impact Assessment undertaken and reported in the ES provides detailed of the biodiversity / ecological enhancement measures that will be put in place as part of the proposed development. It is envisaged, as part the requirements of the policy that there will be a net overall ecological enhancement of the site.
GN.38	Protection and Enhancement of the Historic Environment	Development that affects sites and landscapes of architectural and/or historical merit or archaeological importance, or their setting, will only be permitted where it can be demonstrated that it would protect or enhance their character and integrity.	A series of studies have been undertaken to ascertain the potential for the project to impact on the historic environment. The studies found that there would be no significant impact to such interests. The project therefore is considered to comply with the policy.

