

EIA Scoping Direction

DNS CAS-03107-C5X9W1: White House Farm Solar and Storage Facility

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This Scoping Direction is provided on the basis of the information submitted to Planning and Environment Decisions Wales on 07 July 2025, in addition to consultation responses received. The advice does not prejudice any recommendation made by an Inspector or any decision made by the Welsh Ministers in relation to the development, and does not preclude the Inspector from subsequently requiring further information to be submitted with the submitted DNS application under Regulation 24 of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) (“The 2017 Regulations”).

1. Introduction

Planning and Environment Decisions Wales (PEDW) received a request under Regulation 33 of the 2017 Regulations for a Scoping Direction in relation to a proposed development for a solar photovoltaic electricity generating station (solar farm) with an installed capacity of 39 MW, a 12 MW battery storage facility, and associated ancillary development by Qair Renewables UK Limited.

The request was accompanied by a Scoping Report (SR) dated July 2024 that outlines the proposed scope of the Environmental Statement (ES) for the proposed development: ‘2025-07-04- EIA Scoping Request-00-Scoping Report’ and accompanying documents are available via the Planning Casework Portal - <https://planningcasework.service.gov.wales/> and search **CAS-03107-C5X9W1**

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

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

2. Site Description

The site is divided into two principal areas which are located to the north and west of the village of Freystrop Cross and to the south of the hamlet of Lower Freystrop. The site covers an area of approximately 56.6 ha. Further information is available in section 2.0 of the SR.

3. Proposed Development

The proposal as described in the SR is for a solar farm with an installed capacity of 39 MW, a 12 MW battery storage facility, and associated ancillary development, including a 132 kV substation. Further information is available in section 3.0 of the SR.

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

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

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

4. Consultation

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

- Pembrokeshire County Council
- Natural Resources Wales
- Cadw
- The Health and Safety Executive
- Transport Directorate, the Welsh Government
- Mining Remediation Authority
- Agricultural Land Classification & Soil Team, the Welsh Government
- Dwr Cymru
- Mid and West Wales Fire and Rescue Service

Additional consultation was undertaken with:

- Pembrokeshire Coast National Park Authority (neighbouring LPA)

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

5. Environmental Impact Assessment Approach

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

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

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

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

5.1 Baseline

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

5.2 Reasonable Alternatives

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

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

5.3 Currency of Environmental Information

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

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

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

5.4 Cumulative Effects

In accordance with Schedule 4, Paragraph 5(e) of the 2017 Regulations, the ES should include a description of the likely significant effects of the development on the environment resulting

from “the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance to be likely affected or the use of natural resources”.

The Planning Inspectorate’s guidance for Nationally Significant Infrastructure Projects – Advice on Cumulative Effects Assessment sets out a staged process for assessing cumulative impacts which the Applicant should follow when preparing the list of projects for inclusion in the ES:

<https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment>

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

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

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

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

All of the other developments considered should be documented and the reasons for inclusion or exclusion should be clearly stated. Professional judgement should be used to avoid excluding other development that is close to threshold limits but has characteristics likely to give rise to a significant effect; or could give rise to a cumulative effect by virtue of its proximity to the proposed development. Similarly, professional judgement should be applied to other development that exceeds thresholds but may not give rise to discernible effects. The process of refinement should be undertaken in consultation with Local Planning Authority (LPA), NRW, Cadw and other consultees, where appropriate.

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

5.5 Mitigation

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

5.6 Population and Human Health

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

5.7 Transboundary Effects

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

5.8 Topics Scoped In but not subject to a standalone chapter

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

6. Environmental Impact Assessment Aspects

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

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

6.1 Aspects Scoped In

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

Water Resources

Human Health (not as a standalone chapter)

Climate Change (not as a standalone chapter)

Land and Soils

Material Assets and Waste (not as a standalone chapter)

Major Accidents and Disasters

Ecology and Nature Conservation

Landscape and Visual Amenity

7. Table 1: Planning and Environment Decisions Wales Comments

ID	Reference in Scoping Report	Issue	Comment
Applicant's proposed Aspects proposed to be scoped out			
ID.1	4.3.2 – 4.3.6	Historic Environment	In their response Cadw agree that the Historic Environment can be scoped out of the ES as intervening topography, buildings and vegetation will block or extensively screen all views between the designated historic assets and the proposed development, subsequently significant adverse impact is unlikely. Cadw notes that the historic environment will be considered in a series of standalone reports outside of the ES, which will produce adequate information to assess the impact of the proposed development. In their response, Pembrokeshire County Council request that the applicant liaises directly with them and the Pembrokeshire National Park Authority regarding relevant historic assets that should be included in the Heritage Statement.
ID.2	4.3.7 – 4.3.12	Flood Risk and Water Resources	As the site is within Flood Zone 1 of the Flood Map for Planning and is at very low risk to flooding from surface water and small watercourse, Flood Risk can be scoped out of the ES. NRW advise that due to the proximity of watercourses to the proposed development, Water Resources should be scoped into the ES. NRW note that the hydrological link to the Pembrokeshire Marine SAC, mentioned in section 6.2.1 should be included in the ES under this topic. Regarding the pollution risk from fluid filled transmission cables, the Applicant's attention is drawn to NRW's comments in Appendix 1 where they refer to the Environment Agency's approach to ground water protection. They recommend

ID	Reference in Scoping Report	Issue	Comment
			that the installation of any fluid filled cables or any other cables or pipelines that have the potential to cause pollution be explicitly addressed in the Construction Environment Management Plan (CEMP). Water Resources is scoped into the ES.
ID.3	4.3.13 – 4.3.20	Traffic and Transport	The applicant's attention is drawn to comments from Pembrokeshire County Council (PCC)'s Local Highway Authority and Welsh Government's Transport Directorate in Appendix 1 regarding Traffic and Transport. The comments set out requirements regarding the Transport Statement/Assessment, a detailed Construction Transport Management Plan (CTMP), Glint and Glare Assessment. As these supporting documents will likely outline relevant mitigation measures, PEDW recommends they are included as technical appendices to the ES. PEDW agrees this topic can be scoped out of the ES.
ID.4	4.3.21 – 4.3.24	Air Quality	PEDW agrees that there would be no onsite processes during operation of the development that would result in any air pollutants being released, however, details of any emissions during construction should be included in the CEMP. Provided that the predicted HGV numbers during construction do not exceed the Institute of Air Quality Management (IAQM) thresholds, as stated in the SR, PEDW agrees that Air Quality can be scoped out of the ES.
ID.5	4.3.25 – 4.3.27	Noise and Vibration	PEDW agrees that any noise created during construction can be managed appropriately by a CEMP and can therefore be scoped out of the ES.
ID.6	4.3.28 – 4.3.33	Ground Conditions	PEDW welcomes the proposed ground investigation methods as set out in the SR. NRW add that they generally agree with the additional investigatory work included in the SR and recommend that the landfill 10 m south of the site be specifically identified as an area of interest for the proposed ground

ID	Reference in Scoping Report	Issue	Comment
			investigations. NRW anticipate that the proposed CEMP will address risks to soils, water courses and ground water. The Coal Authority identify coal mining features at surface and shallow depth within the area, including multiple mine entries, coal outcrops and reported surface hazards. These features pose a potential risk to surface stability. The Coal Authority note that the submission is supported by a Phase 1 Desk Study, dated April 2025, which acknowledges the coal mining features recorded to be present and the potential risks they pose to the development. The report recommends intrusive site investigations to determine if shallow coal workings exist and to locate recorded mine entries. The Coal Authority recommends that any mine entries not investigated are fenced and kept devoid of development. They request that the relationship of the mine entries, their zones of influence and the layout of the project is annotated on a layout plan for future submissions. The Coal Authority are content that ground conditions can be scoped out of the ES if coal mining risks are covered in a Coal Mining Risk Assessment (CMRA), Phase 1 and/or Phase 2 report accompanying any formal submission. Ground conditions can therefore be scoped out of the ES.
ID.7	4.3.34 – 4.3.35	Human Health	Human health should be addressed in appropriate chapters of the ES, however a standalone chapter is not required. Human health is therefore scoped into the ES, but not as a standalone chapter.
ID.8	4.3.36 – 4.3.37	Climate Change	PEDW agrees that Climate Change does not require a standalone chapter as related impact will be covered in other chapters. This should include the impact of the project on climate change and the vulnerability of the project to climate change. The applicant may wish to include a carbon balance assessment if they consider the development would have significant benefits in terms of carbon emissions. Climate Change is therefore scoped into the ES, but not as a standalone chapter.

ID	Reference in Scoping Report	Issue	Comment
ID.9	4.3.38 – 4.3.45	Land and Soils	LQAS note that the Predictive ALC Map (2019) notes the site to be approximately 30 ha ALC Subgrade 3a (BMV) and 12 ha Subgrade 3b (non-BMV) agricultural land. In their response, LQAS identify the key issues that are likely to be significantly affected by the development are: Best and Most Versatile (BMV) agricultural land and Maintaining soil services and functions. LQAS have identified a number of technical issues with the Agricultural Land Classification (ALC) report submitted and are not willing to accept the findings as the stand as an accurate assessment of land quality on site cannot be made. LQAS states that the report does not provide sufficient information to support the grading of the site and requests that the applicant provides further justification to the points raised in their response included in Appendix 1. In summary the ALC survey should be validated to confirm the grades, areas and distribution of grades in order to inform and be considered as part of the EIA assessment. PEDW advises the applicant to liaise directly with LQAS, regarding the technical matters that require further clarification. BMV Agricultural Land is therefore scoped into the ES unless it is later agreed by LQAS that it can be scoped out. If BMV Agricultural Land is not included in the ES, it should include robust justification and evidence of any further consultation with LQAS. In terms of impact on soil functions, LQAS considers the development to have likely significant impact on the important services and functions of the soils on site. As detailed in LQAS's response in Appendix 1, further information is required to assess the impact. The detailed information required includes the type, location and level of infrastructure proposed, as well as detailed methodology for the installation and decommissioning.

ID	Reference in Scoping Report	Issue	Comment
			LQAS welcome that a Soil Management Plan (SMP) is proposed. The applicant's attention is drawn to LQAS's comments in Appendix 1, which includes requirements for the SMP. They state that it should be informed by a validated and accepted baseline ALC report, including soil resources and physical characteristic, and be considered as part of the ES process. Therefore, in line with LQAS's advice, Soils, soil functions and land should be scoped into the ES.
ID.10	4.3.46 – 4.3.50	Socio-economics	PEDW agrees that Socio-economic effects can be scoped out of the ES.
ID.11	4.3.51 – 4.3.52	Material Waste	It will be necessary to address Material Assets and Waste in a proportionate manner in relevant chapters, especially given the requirement to address the decommissioning phase in the ES. The draft CEMP should also be included as a technical appendix to the ES. Material Assets and Waste is therefore scoped into the ES, although not necessarily as a standalone chapter.
ID.12	4.3.53 – 4.3.55	Major Accidents and Disasters	The applicant's attention is drawn to the fact that some solar panels are coated in PFAS (Per- and polyfluoroalkyl substances) which can leach over time due to wear and tear. Should the panels proposed include this, appropriate measures need to be put in place to ensure that leaching of PFAS into the local environment does not occur and this should be addressed in a proportionate manner in the ES. The SR highlights that the development will also comprise of energy storage facilities. At this stage it is not clear which type of batteries or storage facilities are proposed. PEDW notes that there is a potential fire risk associated with certain types of batteries such as lithium-ion and that safety measures are required in the design to minimise the risk of fire. PEDW considers this to be part of the EIA process in line with Schedule 4 of the EIA Regulations (Wales) 2017. The proposed development should include adequate measures to ensure that an isolated fire would not become widespread and lead to a major incident. The

ID	Reference in Scoping Report	Issue	Comment
			applicant may consider the submission of a Battery Safety Management Plan confirming that the risks are understood, accounted for and mitigated as far as practicable, in agreement with relevant consultees. The applicant is reminded of the responsibilities set by the Regulatory Reform (Fire Safety) Order 2005. The ES should ensure that risks of accidents are accounted for and mitigated in line with Schedule 4. A proportionate section on this aspect should be included in the ES. The following should be considered: • UK Government advice 'Health and safety in grid scale electrical energy storage systems': https://www.gov.uk/government/publications/grid-scale-electrical-energy-storage-systems-health-and-safety • The National Fire Chiefs Council (NFCC) provide Grid Scale Battery Storage System Planning guidance, available at: https://nfcc.org.uk/wp-content/uploads/2023/10/Grid-Scale-Battery-Energy-Storage-System-planning-Guidance-for-FRS.pdf • HSE guidance on managing health and safety in grid scale electrical energy storage systems which includes an assessment of the principal hazards, available at: https://www.hse.gov.uk/electricity/battery-energy-storage-systems.html Major Accidents and Disasters is therefore scoped into the ES in a proportionate manner.
Ecology and Nature Conservation			
ID.13	6.2.2 6.4.2 6.4.4	Net Benefit for Biodiversity	As noted by the PCC Ecologist, the SR refers to Biodiversity Net Gain (BNG) which is an English Metric, in Wales the correct policy framework is Net Benefit for Biodiversity.
ID.14		Protected Species	As noted by NRW, the ES must include a description of all the existing natural resources and wildlife interests within and in the vicinity of the proposed

ID	Reference in Scoping Report	Issue	Comment
			development, together with a detailed assessment of the likely impacts and significance of those impacts. If protected species are confirmed, NRW require information to be provided identifying the species-specific impacts in the short, medium and long term together with any mitigation and compensation measures proposed to offset the impacts identified. NRW add that comprehensive descriptions of the habitats affected should be included to support robust conclusions about their significance for the species. NRW advise that the ES should consider the current conservation status of the relevant species where applicable. As highlighted by NRW, the ES must demonstrate that there will be no detriment to maintenance of favourable conservation status (FCS) of the species during construction, operation and where relevant decommissioning phases of the scheme. NRW notes that where proposals implicate protected species, which are also notified features of designated sites (e.g. SAC, SSSI), the EIA should consider the impacts on those species from both perspectives. In terms of mitigation and compensation, NRW state that the ES should set out how the long-term site security will be assured, including management and monitoring information and long term financial and management responsibility. Where the potential for significant impacts on protected species is identified, NRW advocate that a Conservation Plan is prepared for the relevant species and included as an Annex to the ES.
ID.15		Habitat Surveys	PEDW highlights that although the 1990 guidelines are quoted in NRW's response, NRW have previously confirmed they endorse the Handbook for Phase 1 habitat survey – a technique for environmental audit (2010, JNCC

ID	Reference in Scoping Report	Issue	Comment
			Resource Hub) as an appropriate standard: https://hub.jncc.gov.uk/assets/9578d07b-e018-4c66-9c1b-47110f14df2a PCC note that the Phase I habitat survey must identify the quality and extent of the habitats present and must be carried out between the months of April and September only. PCC add that the survey should also identify the presence of any invasive species.
ID.16		Bats	NRW note that the proposed development site is located approximately 7.7 km from Slebech Stable Yard Loft, Cellars & Tunnels Site of Special Scientific Interest (SSSI), a constituent part of the Pembrokeshire Bat Sites and Bosherton Lakes/ Safleoedd Ystlum Sir Benfro a Llynnoedd Bosherton Special Area of Conservation (SAC). This protected site has been notified/ designated for their important breeding population of Greater Horseshoe Bats; the sites also incorporate a hibernation roost for the species. It is also noted that Scoveston Fort SSSI, a hibernation site for greater horseshoe bats, is located 4.5 km to the south of the site. Due to the location of the site being within the core sustenance zones for Greater Horseshoe Bats from the nearest significant roost sites and surrounding landscape features being important for bats foraging/dispersing, NRW and PCC advise that any activity surveys undertaken at the site consider foraging and commuting behaviour of horseshoe species bats. NRW note and welcome intentions stated in the SR to retain existing vegetation patterns as far as practicable. Should any trees require pruning or removal as a result of the proposed development, NRW advise that bat surveys are undertaken of any trees that will be impacted by the works. PCC note that any security lighting may impact upon bat movements in the

ID	Reference in Scoping Report	Issue	Comment
			area, therefore if significant lighting is proposed, the activity surveys should be used to establish important areas for bats which must remain dark and inform any lighting plan to ensure there is no impact upon the bats and other nocturnal wildlife. NRW require all surveys for bats to be carried out in accordance with '<i>Bat Surveys for Professional Ecologists – Good Practice Guidelines</i>' (4th edition), published by the Bat Conservation Trust, 2023.
ID.17		Otters	NRW note that records of otters exist within close proximity to the site, along a tributary stream of the Western Cleddau river which forms a part of the Pembrokeshire Marine/ Sir Benfro Forol SAC, for which otters are a designated feature. NRW require all streams on or adjacent to site to be sufficiently buffered from the development and add that all measures to conserve otters using the site during construction and to ensure watercourses are protected during this period, should be included in a CEMP. NRW advise that the design of solar farm security fencing is such that mammals including otters can continue to pass through the developed site. Information on the fencing design which allow otters to move across the site should be included in the ES.
ID.18		Badger	PCC note that records of Badgers are within the area, therefore further work may be necessary. The Applicant should liaise directly with the LPA and NRW for more information on the required surveys.
ID.19		Dormice	PCC confirm that there are no records of Dormice within the area, but their absence cannot be presumed. The Local Authority advises that surveys will not be necessary provided that hedgerows are retained throughout. If hedgerows are to be removed the exact amount of hedgerow to be removed and further

ID	Reference in Scoping Report	Issue	Comment
			justification for not undertaking dormice surveys will be required within any submitted application / ES.
ID.20		Invertebrates	PCC note that there are a number of Section 7 invertebrates in the locality. Therefore, surveys should be undertaken to assess the impact from the development.
ID.21		Ornithology	NRW and PCC recommend that surveys for breeding birds are undertaken and should be in line with industry best practice. Both also advise that species specific surveys are undertaken and should be informed by the habitat on site as well as the results of any desktop survey conducted to date. In line with their comments in Appendix 1, assessments should consider impact of the development on these birds, in terms of loss of habitat and displacement. PCC highlight that there should be specific attention to ground-nesting species. NRW consider the habitats on site to have the potential to support breeding Lapwing and foraging Barn Owl. NRW state that surveys for Barn Owls should follow Barn Owl Survey Methodology and Techniques for use in Ecological Assessment CIEEM (available online at: https://cieem.net/wp-content/uploads/2023/01/Barn-Owl-Survey-Methodology-Revised-2012Final.pdf). NRW advise that a robust mitigation/enhancement package aimed at retaining and promoting barn owls on site is prepared, adding that it should include how appropriate habitat will be retained and managed for the lifetime of the scheme, and the provision of suitable nest boxes. NRW note that determining the importance of species and populations identified from surveys should refer to Wales specific resources and publications where practical.

ID	Reference in Scoping Report	Issue	Comment
			The applicant's attention is drawn to NRW's comments in Appendix 1, where they include sources for relevant population estimates. Reference should be made to Birds of Conservation Concern Wales 4 (BoCCW4) as well as listing on Section 7 of the Environment Act (Wales) 2016, and Schedule 1 of the Wildlife & Countryside Act 1981 (as amended).
ID.22		Protected Sites	PCC state that the change in land use should also be considered for the impact on nutrient sensitive SACs as construction works have the potential to mobilise nutrient-rich sediments and therefore a nutrient budget comparing land uses should be proposed. NRW note that the site is hydrologically linked to the Pembrokeshire Marine Special Area of conservation (SAC) and the Milford Haven Waterway Site of Special Scientific Interest (SSSI) via Merlin's Brook to the west and Red Water to the east and Hook Wood SSSI is also downstream of the application site. NRW highlight that there could therefore be a potential impact pathway, and significant effects on protected sites cannot be ruled out. It is noted that impact will mostly or entirely be during construction, but operational impact should also be assessed. The SR states that surveys are yet to be conducted that will scope in full impact on habitats including watercourses. NRW advise that as the works have potential to impact upon these watercourses, which are hydrologically linked to the Pembrokeshire Marine SAC, they will need to wait for all the surveys to be completed before being able to properly advise the applicant. They note that where the works have potential to impact on European Sites, proposals should be considered under the Habitats Regulations in the form of a Habitats Regulations Assessment (HRA). The applicant is therefore advised to liaise directly with NRW when the surveys have been completed. If it is concluded that the proposal is likely to have a significant effect on a SAC, either alone or in combination with other plans or projects, the Applicant must consult NRW.

ID	Reference in Scoping Report	Issue	Comment
			NRW welcomes that a CEMP and Drainage Strategy is proposed, to secure appropriate mitigation measures that address the risk of any significant effects on the integrity of the protected sites from this development. NRW expect the applicant to adhere to standard pollution prevention measure guidelines as outlined on the Net Regs website, particularly GPP5: Works and Maintenance in or Near Water.
Landscape and Visual Amenity			
ID.23		Pembrokeshire Coast National Park	NRW provide comments in relation to the landscape character and visual amenity of the Pembrokeshire Coast National Park (PCNP), and the statutory purpose of the designation to conserve and enhance its natural beauty. The PCNP boundary is approximately 275 m west of the site at the closest point.
ID.24		Landscape and Visual Impact Assessment (LVIA)	The LVIA should be carried out with reference to the Guidelines for Landscape and Visual Impact Assessment, 3rd edition 2013 (GLVIA3). Other guidance not referred to in the SR, but recommended by NRW includes: • Notes and Clarifications on Aspects of the 3rd Edition GLVIA3 LITGN-2024-01, Landscape Institute. • NRW Guidance Note 46 Using LANDMAP in Landscape and Visual Impact Assessments. • Technical Guidance Note (TGN) 02/21 Assessing Landscape Value Outside • National Designations, Landscape Institute. NRW confirm that the 2.5 km radius study area proposed in the SR is satisfactory.

ID	Reference in Scoping Report	Issue	Comment
			NRW note that the LVIA should assess cumulative impacts on landscape and visual receptors, where appropriate. It is recommended that the applicant liaises with the LPA to agree on any relevant cumulative schemes.
ID.25		LVIA Viewpoints	It is noted that only one viewpoint within the PCNP is proposed to be included within the LVIA. NRW query whether a greater amount of the site / development might be visible from further east along the bridleway from VP 1, where visibility is also shown on the ZTV. This should be checked and reported on by the authors of the LVIA. NRW also request an additional viewpoint based on the results of the ZTV, from the more elevated land north of the Cleddau, around the trig point near (north of) Norchard. NRW agrees that the annotated photograph from CP1 within the LVIA, appears to be appropriate. NRW advise the annotations should clearly identify any fields which are located within the site (shading may be appropriate) and a clean unannotated baseline photograph should be provided for comparison. NRW note that there are public rights of way outside of the PCNP with potential visibility. NRW suggest that these areas should be considered as potential viewpoint locations. NRW advise the applicant to consult the LPA regarding the suitability of these for inclusion in the LVIA. Possible additional; viewpoint locations (outside of the PCNP) identified by NRW are: • Public footpaths around Middle Hill, immediately east of the site. • Public footpath between Johnston School and Targate, south of the site. • Bridleway north of Targate, south of the site.

ID	Reference in Scoping Report	Issue	Comment
			NRW require all photography and visualisations to be prepared and presented in accordance with the requirements of TGN 06/19 prepared by the Landscape Institute which we advise is best practice guidance for the preparation of visualisations. Given the reliance on screening by vegetation, viewpoints should be represented by winter photography.
Other Considerations			
ID.26		Cumulative Assessment	To ensure a comprehensive assessment in the final ES, the Applicant is advised to liaise with the LPA on development proposals that should be included in the cumulative assessment, as they will be aware of developments in their area which will need to be considered, which may extend beyond other renewable energy developments

8. Other Matters

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

8.1 Changes to PPW

On 11 October 2023 the Welsh Government introduced changes to Chapter 6 of PPW relating to:

- Green Infrastructure,
- Net Benefit for Biodiversity and the Step-wise Approach,
- Protection for Sites of Special Scientific Interest, and
- Trees and Woodlands.

Details are available in the relevant 'Dear Chief Planning Officer' letter:

<https://www.gov.wales/addressing-nature-emergency-through-planning-system-update-chapter-6-planning-policy-wales>

These changes have now been consolidated into a new edition of PPW (ed. 12), published on 07 February 2024: <https://www.gov.wales/planning-policy-wales>

8.2 Updated Guidance from the Design Commission for Wales

On 23 November 2023 the Design Commission for Wales published their updated guidance "Designing for Renewable Energy in Wales". The guidance is available online:

<https://www.gov.wales/designing-renewable-energy-wales>

8.3 Habitats Regulation Assessment

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

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

whether the plan or project will affect the integrity of the European site, which can include at that stage consideration of the effectiveness of the proposed avoidance or reduction measures.

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

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

8.4 SuDS Consent

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

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

Appendix 1: Consultation Responses

Date • Dyddiad 28/8/2025
Your ref • Eich cyfeirnod DNS CAS-03107-C5X9W1
My ref • Fy nghyfeirnod CO/0192/25
Telephone • Ffôn 01437 764551
Email • E-bost Planning.support.team@pembrokeshire.gov.uk
www.pembrokeshire.gov.uk / www.sir-benfro.gov.uk



Pembrokeshire County Council
Cyngor Sir Penfro

WILL BRAMBLE CBE
Chief Executive / Prif Weithredwr

RICHARD BROWN
Assistant Chief Executive
Cynorthwyol Brif Weithredwr

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

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

Telephone / Ffôn 01437 764551

Please ask for
Os gwelwch yn dda gofynnwch am

Planning and Environment Decisions Wales

By email only:
PEDW.Infrastructure@gov.wales

Dear Sir / Madam

Proposal: **39 MW Peak (MWp) solar farm and 12 MW battery energy storage system (BESS).**

Location: **Land at White House Farm, Freystrop, Pembrokeshire, SA62 4LE**

Planning and Environment Decisions Wales (PEDW) consulted Pembrokeshire County Council local planning authority (the LPA) on 8th July 2025 requesting the LPA's comments on the proposed scope of the EIA in respect of the above proposed development.

The LPA have considered the Environmental Impact Assessment Scoping Report (July 2025; 5076-01-SCP-01).

With reference to 1.3.5, I note that PEDW issued an EIA Screening Direction on 7th March 2024 confirming that the proposal is EIA development and therefore the application must be accompanied by an Environmental Statement.

In respect of Ecology, please refer to the comments of the Council's Ecologist (Appendix 1).

In respect of former coal mining activity, it is noted that the Mining Remediation Authority have been consulted. The LPA defer to the MRW on this matter.

In respect of the proposed assessment of effects on the Best and Most Versatile Agricultural Land, it is noted that the Agricultural Land Classification & Soil Team at the Welsh Government have been consulted. The LPA defer to them on this matter. Nevertheless, it is noted that this topic appears to be included in the list of matters to be scoped out of the EIA, albeit it appears as one of the reasons for requiring an EIA in the Screening Direction.

Whilst historic environment effects are proposed to be scoped out of the EIA, it is imperative that the proposed Heritage Statement considers the effects on all relevant historic assets. The applicant is respectfully requested to liaise with the LPA, and the Pembrokeshire Coast National Park Authority within whose area some of the assets are located, to ensure that the scope of such an assessment is satisfactory.

Whilst transportation effects are proposed to be scoped out of the EIA, with regard to the proposed Transport Statement, the LPA has provided the enclosed pre-application advice (Appendix 2).

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

Yours sincerely

A solid black rectangular box used to redact the signature of Mike Simmons.

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

Appendix 1

LPA Ecologist comments on Environmental Impact Assessment Scoping Report (July 2025; 5076-01-SCP-01)

Chapter 6 on the Scoping report states that wintering bird surveys have been completed and ongoing surveys are being conducted by FPCR to assess the ecological baseline; these will cover bats, UKHabs/ Phase 1, and biodiversity net gain (BNG). BNG is an English Metric and a full list of surveys planned to be undertaken would have been preferable. I appreciate that more detail on habitats of importance will follow from the UKHabs/Phase 1 surveys. However, I have listed the surveys below that I would hope to see:

- **A Phase I habitat survey** must identify the quality and extent of the habitats present. The habitat survey must be carried out between the months of April and September only. It should also identify the presence of any invasive species.
- **Reptiles** – common species of reptiles may be present on a site of this nature.
- **Badgers** – Badgers are within Freystrop and records are within the area.
- **Birds** – The application must make an assessment of the bird populations currently using the application area in the form of a breeding bird survey and the impact of the development on these birds, in terms of loss of habitat and displacement. With specific attention to ground-nesting species.
- **Dormice** – There are no records of dormice within the area but their absence cannot be presumed. Provided the hedgerows are retained throughout and there are no hedgerows to be removed, dormouse surveys will not be necessary. However, in the event that hedgerows will be removed the exact amount of hedgerow to be removed and further justification for not undertaking dormice surveys will be required within any submitted application/ES. Dormice are protected under European and UK legislation, their presence is a material consideration in the planning process.

- **Bats** – There are several important sites for bats within relatively close proximity to the proposed development. Consideration will need to be made of any impacts for foraging and commuting bats. Bat activity surveys (static detectors only) have been undertaken and further activity surveys are ongoing. The field habits and woodland are likely to be used by foraging and community bats. Any security lighting may impact upon bat movements in the area, therefore if significant lighting is proposed, the activity surveys should be used to establish important areas for bats which must remain dark and inform any lighting plan to ensure there is no impact upon the bats and other nocturnal wildlife. Bats are protected under European and UK legislation, their presence is a material consideration in the planning process.
- **Invertebrate** – There are a number of section 7 invertebrates in the locality. Therefore surveys should be undertaken to assess the impact from the development.
- **Otter** – There are records of otters in the vicinity. Otters are protected under European and UK legislation, their presence is a material consideration in the planning process.

The change in land use should also be considered for the impact on nutrient sensitive SACs. Construction works has the potential to mobilise nutrient-rich sediments, therefore a nutrient budget comparing land uses should be proposed.

Pembrokeshire County Council
Infrastructure
Highways Development Control
HWDCconsult@pembrokeshire.gov.uk



To: Tom Milburn

Enquiries to: Toni Macey/ Kirstie Donoghue

Ref: PE - 2788

Date: 18/08/2025

Pembrokeshire Council – Pre-Planning Response

Location: White House, Moorland Road, Freystrop, Haverfordwest, SA62 4LE

Description: A solar photovoltaic electricity generating station with an installed capacity of 39 MW, a 12 MW battery storage facility, and associated ancillary development, including a 132 kV substation

In order to assess the Pre-application the following documents have been considered:

- Pre-planning application enquiry form
- Site Location Plan
- Solar Mitigation Plans
- Pre-Planning Statement

A site visit has not been undertaken.

Comments:

The CHA has previously responded to a pre-application enquiry for the same proposal submitted by the applicant. The CHA has used some of information submitted within the previous pre-application response (PR/0311/24) to provide clarity, context and consistency to this pre-application. The information submitted for this pre-application appears to be in relation to previous highway recommendations.

Site Location

The proposed site relates to two parcels of land north and west of Freystrop Cross, on land associated with White House Farm, Freystrop, separated by Northmoor Common, a small strip of common land. White House Farm is located approximately 2.5km south of Haverfordwest and circa 925m west of Freystrop Cross. The site can be seen in Figure 1, below.

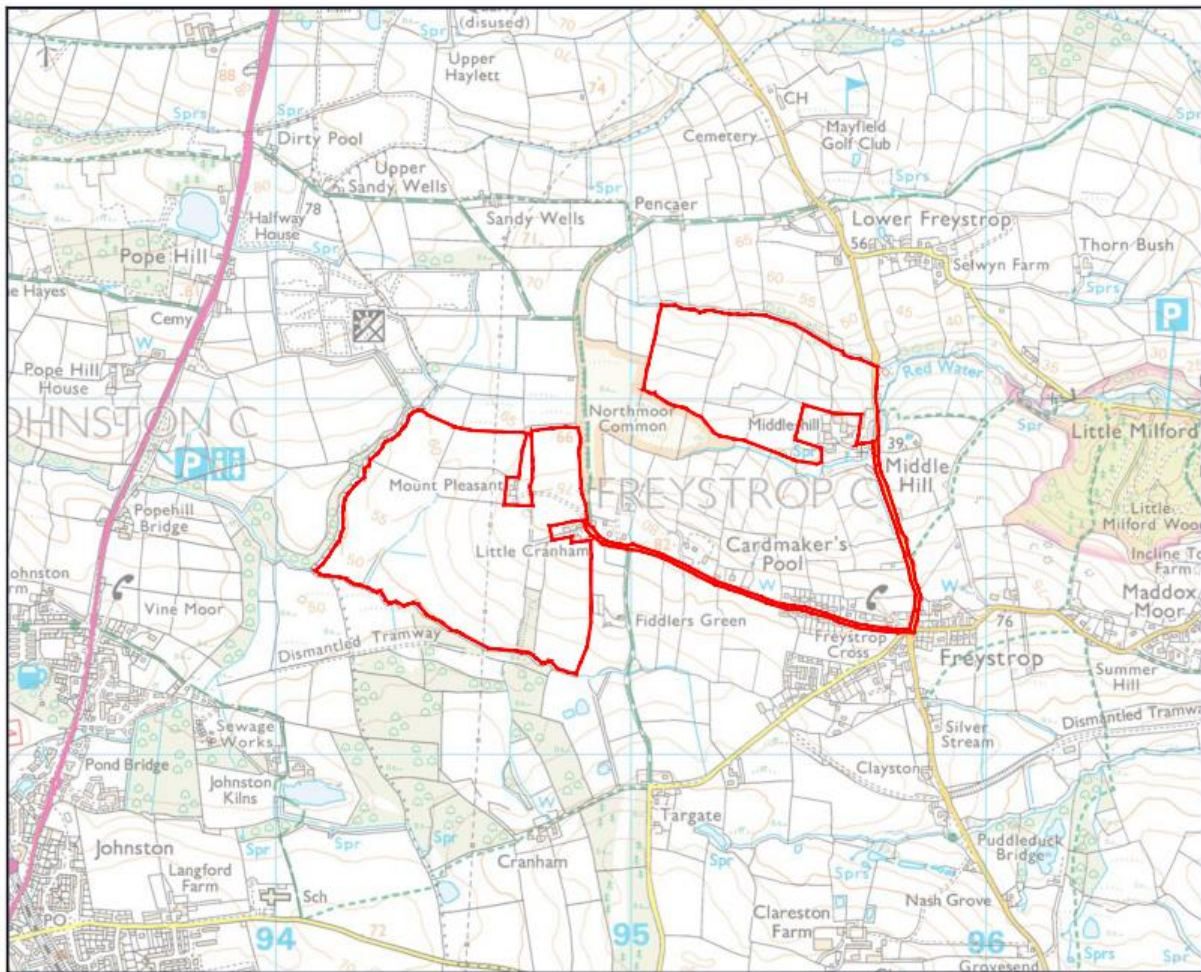


Figure 1: Site Location (Axis, Drawing No. 5076-01-01, February 2025)

Access

The site plan and pre-planning application statement show that both parcels of land will have a separate access. The southern site will be accessed off narrow and lightly trafficked unclassified public highway (U6071) known as Moorland Road via an extant access point immediately north of White House Farm. The access is approximately 960m west of the junction of U6071/ C3007 (known as Freystrop Cross), the access route is shown in Figure 2 below.

The Public Highway ceases at the northern point of the existing access and continues on as a Registered Public Right of Way (PROW), Bridleway PP21/3/1, upon which the public have a right of passage on foot, pedal bicycle and horseback along this public right of way.

Moorland Road has a posted speed limit of 20 mph, accesses within this speed limit require visibility splays of 2.4m x 25m, a desktop study illustrates that these sight lines are available both sides of the existing access. As there is some vegetation growth

within the visibility splays to the north, some maintenance may be required to ensure continued visibility.

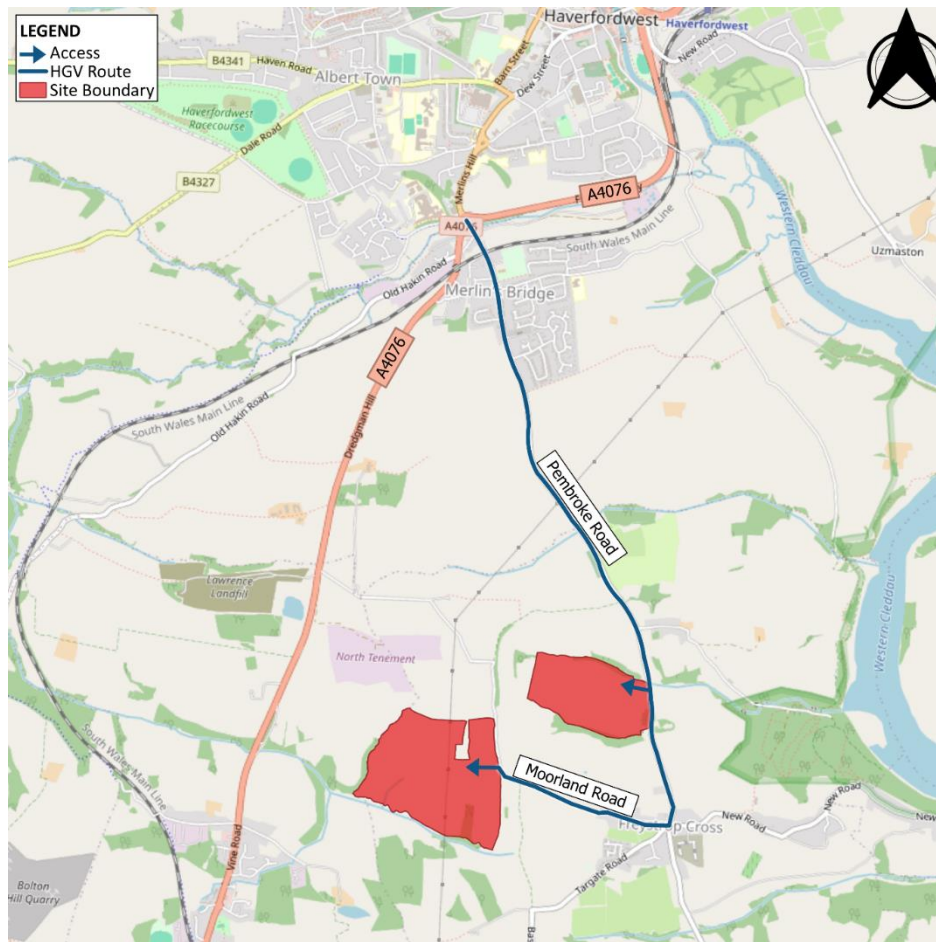


Figure 2: Site Location (Access Route, shown as submitted by Axis)

The exact origin of construction related HGV trips is uncertain at this stage and will be determined by the sourcing of materials and plant by the appointed contractor. HGVs will nonetheless be routed primarily along the strategic road network, avoiding residential areas and statutory limits on HGV movements (such as weight restrictions). The preferred route to / from the Site is shown on the HGV route plan illustrated in figure 2.

The western end of Moorland Road past West Priory View dwelling to the application site access narrows considerably to circa 3m wide at its slimmest. There are two formal passing bays along this stretch of road with some additional informal bays located at fields/ residential accesses. The applicants have submitted plans (Drawing No. 5076-ATR01 to ATR05) showing a package of traffic mitigation measures running from Merlins Bridge Roundabout, along Pembroke Road and Moorland Road, which will assist in accommodating the required HGV movements during construction.

Following a review of the plans, the CHA is satisfied with the proposed localised carriageway widening and the inclusion of additional passing bays especially along Moorland Road. The submitted plans also include Swept Path Analysis for HGVs

which, is deemed suitable. Detailed plans of any new/improved passing bays should be submitted with any forthcoming application, including passing bays a minimum of 12m in length with splays, surface details to be provided and any draining/culverting details as required.

The current width of the access does not allow for vehicles to enter/ exit simultaneously in addition, the width of the access lane and unclassified highway adjacent to the access does not allow for two vehicles to pass each other. Therefore, in order to prevent vehicles stopping and waiting on the carriageway thereby blocking the flow of traffic, the CHA recommend that a passing bay (a minimum length of 12m) located behind the gates on the private lane.

The access track will be required to be surfaced bound for the first 12m, to reduce debris being transported onto the public highway.

The northern parcel of land will be accessed via an existing entrance north of Middle Hill Farm (opposite the Slate Centre Access) off C3007 known a 40mph speed limit. The access is shown in Figure 3 below.

The access junction is wide, allowing for two way traffic, there is an extensive verge either side of the access, with low lying vegetation for the first 2-3 metres. Visibility splays for accesses within a 40mph speed limit would require splays of 2.4 x 120m.

The CHA has undertaken a desktop survey and can confirm that 120m sight lines are achievable to the south of the access however, due to the topography of the road to the north of the access, sight lines of approximately 85-90m are achievable to the offside of the carriageway. Dependent upon the traffic intensification during the construction of the proposed development, mitigation measures may be required increase the sight lines to the north and the Pre- Planning Statement states the need to cut back vegetation to improve visibility will also be considered;

Construction Traffic

The Technical Note (TN) (Doc Ref: 5076-01-TN01, July 2025) estimates that the development will take approximately 7 months to construct which would be split down into three phases (site setup Including access track Solar farm construction and commissioning phase). Construction will generally take place Monday to Friday 08:00-18:00, with no work on Sundays or bank holidays. The TN illustrates that the development is unlikely to exceed 13 two-way HGV movements per day during construction phase (Week 1-8) with this dropping to 6 two- way movements during weeks 9-28, with no HGV movements during the final phase.

The Pre-Planning statement estimates using 'first principle' assumptions of car occupancy of 2 people per vehicle, that trip generation forecast for construction staff to peak between weeks 8 – 28 (with 80 staff), with weeks 1 – 8 being 50% of staff the peak and during the final weeks 28 – 32 only 25% of staff would be required. This

equates to estimated 40 two-way (80 one-way) vehicles movements during the peak phase associated with construction staff. Therefore, during the peak weeks of construction (Weeks 9-28) the approximate trip generation associated with the proposed development would reach 46 two way movements per-day during this period. This is deemed acceptable with the proposed mitigation measures along the potential HGV route.

The Pre-Planning statement estimates that during the operational phase maintenance will be infrequent resulting in negligible operation traffic movements.

With the delivery vehicles likely to arrive in within a short timeframe the proposal of the additional passing bays along Moorland Road is welcome, offer opportunities for vehicles to pass without excess reversing and with pedestrian refuge opportunities. The CHA notes the construction traffic will be split evenly between the two proposed sites which will further reduce the impact on Moorland Road. This is deemed acceptable.

Road Traffic Collisions

A review of Crash Map has indicated one slight accident in June 2021 within the immediate vicinity (400m) of the sites located on at on the C3007 Freystrop Cross Junction. The Applicant is requested to provide a STATS19 review for Road Traffic Collisions in any forthcoming planning application, and any proposed mitigation measures which may be required to prevent future accidents in this area due to the increase in HGV vehicles.

Transport Statement

The Pre- planning statement confirms that the applicant will be submitting a Transport Statement (TS) will be submitted to support the proposed development with any forthcoming application. It confirms that the following will be covered within the document

- Existing Conditions- including a review of the most recent available 5-year Personal Injury Accident record for the study area (HGV Route).
- Proposed Development- including the proposed access, the HGV route and swept path analysis (SPA) of the relevant sections.
- Trip Generation- a forecast trip generation of the construction and operational phases,
- Mitigation - Consideration to any mitigation interventions necessary to accommodate the required HGV movements during construction, this will include localised kerb widening and the provision of additional passing places.

Sustainable Transport

Any future planning application should be prepared in line with the Active Travel (Wales) Act 2013 and design guidance issued from Welsh government, 2014. Planning Policy Wales (Edition 11) states that all planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling. The aim should be to create walkable neighbourhoods, where a range of facilities are within walking distance of most residents, and the streets are safe, comfortable, and enjoyable to walk and cycle. The Wales Transport Strategy (2021) also supports developments which prioritise active travel modes above public transport, with private vehicles having the lowest prioritisation.

As such, the CHA would encourage all future sites coming forward to prioritise active travel within the area of Pembrokeshire and make contributions towards provision of sustainable transport networks within the proximity of the site.

Thus the CHA recommends the TA should also include a Travel Plan framework, outlining a package of measures aimed at minimising the single occupant car journeys generated by the site and encouraging sustainable travel choices, to and from the site.

Public Transport and Car Sharing

Depending on staffing needs; there may be an opportunity for the applicants to supply a mini-bus/ or car-sharing scheme/ opportunity, to collect/drop-off staff at the local Bus Stop/ Train Station in Haverfordwest or other nominated meeting point to minimise the number of personal vehicles travelling to site.

Cycle Facilities

The CHA would encourage the applicants / developers to provide sheltered, safe and secure cycle facilities within the welfare compound, to promote and encourage local contractors to travel to and from the site by active and sustainable measures.

Horses and Equestrians

Due to the access to the southern parcel of land off a Bridleway and Moreland Road often used by Equestrians. The CHA requests that the applicants/ developers give consideration of the interaction between HGVs and Horses/ Horse Riders.

All HGV drivers and site personnel should be given training instruction/ solution with regular reminders, on the actions to take upon contact with a horse and rider (as advised by the British Horse Society), these details should be included with any forthcoming planning application.

Glint and Glare Assessment

The CHA request a glint and glare assessment is submitted within any forthcoming planning application. This report will be used to ensure that the proposed development will not adversely impact the local Highway Network.

Construction

A detailed Construction Transport Management Plan (CTMP) will need to be provided to support any future planning application. In particular, the Applicant is advised to consider implementing Considerate Construction Scheme elements in order to ensure that the residents in the local area, and the general public, are kept up to date with construction phases and project timelines. Included in the CTMP should be the following:

- a) Traffic Management and Parking for vehicles, site personnel, operatives and visitors (consideration of a park/ride system / car share scheme)
- b) Expected levels of staff and any shift work, by phase
- c) Expected trip generation for the construction period
- d) Loading and unloading of plant and materials
- e) Storage of plant and materials
- f) Erection of hoarding or heras fencing as indication on a submitted plan
- g) Vehicle routing
- h) Measures to prevent the deposit of materials on the highway
 - l) Before and after construction conditions surveys of the highway and a commitment to fund the repair of any damage caused
- k) On-site turning for construction vehicles

If Abnormal Indivisible Load (AIL) are required to be used during the construction phase then a AIL Management Strategy and Routing, will need to be included in the CTMP including any required additional traffic management. The County Highway Authority (CHA) strongly recommends that any AIL movements are undertaken overnight when there is considerably less traffic on the highway network, under the supervision of the Police.

Recommendation:

1. For the southern parcel of land, the CHA recommends a passing bay (a minimum length of 12m) is implemented behind the gates on the private lane, preventing vehicles requiring to stop and wait on the public highway, with the track surfaced bound for the first 12m, to reduce debris being transported onto the public highway.

2. A Transport Statement (TS) will be required to be submitted to support the proposed development with any forthcoming application. At minimum this should include current traffic flows and proposed trip generation of the development, if the proposal is expected to have a significant impact upon the public highway in terms of capacity or highway safety proposed mitigation measures to combat these. Measures to improve the accessibility of the site and promote active and sustainable travel, through a Travel Plan.
3. Any mitigation measures proposed within any forthcoming planning application should include detailed plans. If new/improved passing bays are proposed the plans should show a minimum of 12m in length with splays, surface details to be provided and any draining/culverting details as required to accommodate HGVs.
4. Dependent upon the traffic intensification during the construction of the proposed development, mitigation measures may be required increase the sight lines to the north of the northern parcel of land's access.
5. The CHA recommends further details of the provision for safe, secure and sheltered cycle facilities within the welfare compound are provided with any future planning applications, to encourage active travel by construction personnel.
6. The CHA recommend consideration be given to the interactions between HGV drivers/ Site Contractors and Horses and Riders. Details should be included with any forthcoming planning application.
7. The CHA request a glint and glare assessment is submitted within any forthcoming planning application. This report will be used to ensure that the proposed development will not adversely impact the local Highway Network
8. The Applicant is advised to check Stats19 data for any up-to-date RTCs which may have occurred between the time of pre-app and any subsequent planning application along the proposed Construction route between the Trunk Road and the site access.
9. A detailed Construction Transport Management Plan (CTMP) will need to be provided to support any future planning application

This information in this assessment has been provided based upon the evidence available to support the pre-application. Any future planning application used to support the proposed development at this location, of a similar size and scale, will be made without prejudice and based upon its own merit.

If you have any further questions, please do not hesitate to get in touch.

Kind regards,

Toni Macey/ Kirstie Donoghue

Transport Planners

Pembrokeshire County Council.

Ein cyf/Our ref: CAS-284190-D5W3
Eich cyf/Your ref: DNS CAS-03107-
C5X9W1

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

Dyddiad/Date: 12 August 2025

Annwyl Syr/Madam/Dear Sir/Madam,

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

Proposed Development: The proposed development comprises a 39 MW Peak (MWp) solar farm and 12 MW battery energy storage system (BESS).

Site Address: Land at White House Farm, Freystrop, Pembrokeshire, SA62 4LE

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) on the above scoping opinion, which we received on 08 July 2025.

The Environmental Statement (ES) for this development should include sufficient information to enable you to determine the extent of any environmental impacts arising from the proposed scheme. Evaluation of the impacts of the scheme should include: direct and indirect; secondary; cumulative; short, medium and long term; permanent and temporary; positive and negative, and construction, operation and decommissioning phase.

We welcome the submission of the *White House Farm Solar and Storage Facility Environmental Impact Assessment Scoping Report*, by Axis dated July 2025. Ref. 5076-01-SCP-01 and associated documents and are comments are as follows:

Protected Species

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

Key Habitats

Any habitat surveys should accord with the NCC Phase 1 survey guidelines (NCC (1990) Handbook for Phase 1 habitat survey. NCC, Peterborough).

We advise that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present.

Surveys

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

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

Bats

We note that bats have been scoped in for further survey as part of the EIA. No information appears to be provided on the nature of the intended surveys.

We observe that the proposed development site is located circa 7.7 km from Slebech Stable Yard Loft, Cellars & Tunnels Site of Special Scientific Interest (SSSI), a constituent part of the Pembrokeshire Bat Sites and Bosherton Lakes/ Safleoedd Ystlum Sir Benfro a Llynnoedd Bosherton Special Area of Conservation (SAC). This protected sites has been notified/ designated for their important breeding population of greater horseshoe bats; the sites also incorporate a hibernation roost for the species. Additionally, Scoveston Fort SSSI, a hibernation site for greater horseshoe bats, is located 4.5 km to the south of the site.

This application site therefore lies at the further limit of the core sustenance zones for greater horseshoe bats from the nearest significant roost sites, as listed above. However, landscape features beyond the core sustenance zones are also important for bats foraging/ dispersing through the wider landscape, and we therefore advise that any activity surveys undertaken at the site consider foraging and commuting behaviour of horseshoe species bats.

We note and welcome the intention is to *“Retain existing vegetation patterns as far as practicable by maintaining a minimum 5m buffer between field boundary hedgerows and woodland, and the stock fencing around the development areas”*.

Should any trees require pruning or removal as a result of the proposed development, we advise that bat surveys are undertaken of any trees that will be impacted by the works.

All surveys for bats should be carried out in accordance with ‘*Bat Surveys for Professional Ecologists – Good Practice Guidelines*’ (4th edition), published by the Bat Conservation Trust, 2023.

Otters

We note that otter records exist [REDACTED]

[REDACTED]
[REDACTED] The Western Cleddau river forms a part of the Pembrokeshire Marine/ Sir Benfro Forol SAC, for which otters are a designated feature.

All streams on or adjacent to site need to be sufficiently buffered from the development. All measures to conserve otters using the site during construction and to ensure watercourses are protected during this period, should be included in a Construction Environmental Management Plan (CEMP).

In general, we advise that the design of solar farm security fencing is such that mammals including otters can continue to pass through the developed site. Information on the fencing design which allow otters to move across the site is included in the ES.

Impact Assessment

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

Comprehensive descriptions of the habitats affected should be included to support robust conclusions about their significance for the species.

We advise that the EIA considers significance (both alone and in combination) and where applicable conservation status. In respect of conservation status, consideration should be given to the current conservation status of the relevant species. The EIA must demonstrate that there will be no detriment to maintenance of favourable conservation status (FCS) of the species during construction, operation and where relevant decommissioning phases of the scheme.

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

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

EPS Licence

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

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

- (a) It satisfies an appropriate derogation or licencing purposes, which in the case of development is most likely to be preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or

economic nature and beneficial consequences of primary importance for the environment;

(b) There is no satisfactory alternative and

(c) The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

These requirements are also translated into planning policy through Planning Policy Wales (PPW) February 2021, section 6.4.22 and 6.4.23 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The local planning authority will take them into account when considering the EIA where a European Protected Species is present.

Local Biodiversity Interests

We recommend that the developer consults the local authority Ecologist on the scope of the work to ensure that regional and local biodiversity issues are adequately considered, particularly those habitats and species listed in the relevant Local Biodiversity Action Plan and those that are considered important for the conservation of biological diversity in Wales.

We would expect the developer to contact other relevant people/ organisations for biological information/ records relevant to the site and its surrounds. These include the relevant Local Records Centre and any local ecological interest groups (e.g. bat groups, mammal groups).

Ornithology

We recommend that surveys for breeding birds are undertaken. These surveys should be in line with industry best practice (see Bird Survey Guidelines). Additional, species-specific surveys should also be considered and should be informed by the habitat on site as well as the results of any desktop survey conducted to date.

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

The site has the potential to support breeding and foraging barn owl. Surveys for barn owls should follow Barn Owl Survey Methodology and Techniques for use in Ecological Assessment | CIEEM. In lieu of additional surveys, a robust mitigation/enhancement package aimed at retaining and promoting barn owls on site. This should include how appropriate habitat will be retained and managed for the life time of the scheme, and the provision of suitable nest boxes.

Determining the importance of species and populations identified from surveys should refer to Wales specific resources and publications where practical.

Relevant population estimates can be found in, but no limited too, Hughes et al. 2020 (Wales), Birds of Wales/Adar Cymru (Pritchard et al. 2021), Woodward et al. 2020 (UK/Britain), and the UK Rare Breeding Birds Panel. County Bird Reports, and the Welsh Bird Reports may also contain relevant information. Reference should be made to Birds of Conservation Concern Wales 4 (BoCCW4) as well as listing on Section 7 of the Environment Act (Wales) 2016, and Schedule 1 of the Wildlife & Countryside Act 1981 (as amended).

Protected Sites

The site is hydrologically linked to the Pembrokeshire Marine Special Area of conservation (SAC) and the Milford Haven Waterway Site of Special Scientific Interest (SSSI) via Merlin's Brook to the west and Red Water to the east. Hook Wood SSSI is also downstream of the application site. There is therefore a potential impact pathway, and we cannot rule out any significant effects on protected sites. The impact will mostly or entirely be during construction but operational impact should also be assessed.

We have reviewed the Scoping Report and given the proximity of watercourses to the proposed development, we advise that water resources should be scoped into the ES.

We note that section 6.3.1. states that *“surveys yet to be conducted will scope in full impacts on habitats. Significant impacts to Site habitats would relate to the direct loss of habitats and indirect impacts on habitats, such as watercourses, from pollution and siltation events.”* Therefore, as the works have potential to impact upon these watercourses, which are hydrologically linked to the Pembrokeshire Marine SAC, we need to wait for all the surveys to be completed before being able to properly advise the applicant. Where the works have potential to impact on European Sites, proposals should be considered under the Habitats Regulations in the form of a Habitats Regulations Assessment (HRA).

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), it is for your Authority to carry out the test of Likely Significant Effects for the proposed development. Should you conclude that the proposal is likely to have a significant effect on a SAC, either alone or in combination with other plans or projects, an appropriate assessment must be made on the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as you specify.

We note that the applicant proposes to submit a CEMP and Drainage Strategy, which we welcome, to secure appropriate mitigation measures that address the risk of any significant effects on the integrity of the protected sites from this development. We would expect the applicant to adhere to standard pollution prevention measure guidelines as outlined on the [Net Regs website](#), particularly GPP5: Works and Maintenance in or Near Water.

In terms of hydrology, whilst mentioned in section 6.2.1., the hydrological link to the Pembrokeshire Marine SAC should be included in the 'Flood Risk and Water Resources' section regardless of whether hydrology is ultimately scoped in/out of the assessment.

Landscape

Our landscape planning advice relates to the landscape character and visual amenity of the Pembrokeshire Coast National Park (PCNP), and the statutory purpose of the designation to conserve and enhance its natural beauty.

Our advice is based on the *White House Farm Solar and Storage Facility Environmental Impact Assessment Scoping Report* prepared by Axis (Scoping Report). In particular:

- Section 7: Landscape and Visual Amenity.
- Figure 5 – Landscape and Visual Context
- Figures 6a-i – Baseline Photography
- Appendix A – Draft LVIA Methodology

The PCNP boundary is approximately 275m west of the Site at the closest point. To accord with Policy 18 of Future Wales: The National Plan 2040 (FW), the proposals should not have an unacceptable adverse impact on the surrounding landscape, particularly on the setting of the PCNP.

Section 7: Landscape and Visual Amenity

A Landscape and Visual Impact Assessment (LVIA) will be prepared and will include an assessment of the potential effects on Landscape Character Area 28 within the PCNP (Paragraph 7.2.15).

The LVIA will be carried out with reference to *Guidelines for Landscape and Visual Impact Assessment, 3rd edition, 2013* (GLVIA3), which is best practice guidance for preparing a LVIA.

We advise other relevant guidance not referred to in the Scoping Report but which should inform the preparation of the LVIA, is:

- Notes and Clarifications on Aspects of the 3rd Edition GLVIA3 LITGN-2024-01, Landscape Institute.
- NRW Guidance Note 46 Using LANDMAP in Landscape and Visual Impact Assessments.
- Technical Guidance Note (TGN) 02/21 Assessing Landscape Value Outside National Designations, Landscape Institute.

A 2.5km radius study area is proposed for the LVIA. This was determined based upon the Zone of Theoretical Visibility (ZTV) analysis presented on Figure 5, and is satisfactory. Figure 5 includes the results of ZTVs based on both a digital terrain model (DTM) and a digital surface model (DSM); the latter accounts for the screening effect of existing vegetation.

The DSM ZTV indicates that visibility within the PCNP (within proposed study area) will be limited, and where it does occur, will relate primarily to private land. As such only one viewpoint within the PCNP is proposed to be included in the LVIA (VP 1: Public bridleway, Western Cleddau).

We query whether a greater amount of the site / development might be visible from further east along the bridleway from VP 1, where visibility is also shown on the ZTV. This should be checked and reported on by the authors of the LVIA.

Additionally, based on the results of the ZTV, we request an additional viewpoint (which may be illustrative) from the more elevated land north of the Cleddau, around the trig point near (north of) Norchard.

It is proposed to include an annotated photograph from VP 1 within the LVIA.

Notwithstanding the above requests, and based on the limited intervisibility indicated in the draft photography submitted with the Scoping Report, this appears to be appropriate. We advise the annotations should clearly identify any fields which are located within the site (shading may be appropriate) and a clean unannotated baseline photograph should be provided for comparison.

Outside of the PCNP, we note several areas where visibility based on the DSM is shown on public rights of way close to the site but no viewpoint is proposed. These areas should be considered as potential viewpoint locations. The applicant should consult the LPA regarding the suitability of these for inclusion in the LVIA. Possible additional viewpoint locations (outside of the PCNP), include:

- Public footpaths around Middle Hill, immediately east of the site.
- Public footpath between Johnston School and Targate, south of the site.
- Bridleway north of Targate, south of the site.

All photography and visualisations will be prepared and presented in accordance with the requirements of TGN 06/19 prepared by the Landscape Institute which we advise is best practice guidance for the preparation of visualisations. Given the reliance on screening by vegetation, viewpoints should be represented by winter photography.

The LVIA will assess cumulative impacts on landscape and visual receptors, where appropriate. We have not been able to find a list of cumulative schemes proposed for inclusion in the LVIA, but advise the LPA is best placed to advise on (if any) relevant cumulative schemes.

We note proposed mitigation will include:

- Buffers between proposed structures and field boundaries, watercourses and ditches, and tree and woodland cover, to protect existing landscape features;
- Planting of new screening vegetation to reduce the visual effects of the Proposed Development;
- A Landscape and Ecological Management Plan to ensure that landscape proposals are managed and maintained for the operational life of the Proposed Development.

We note the development of mitigation measures, including measures embedded into the design of the Proposed Development will be informed by *Designing for Renewable Energy in Wales*, 2023, Design Commission for Wales. We advise published local landscape character information (e.g. prepared by Pembrokeshire County Council and NRW (LANDMAP)) should also be referred to when developing mitigation measures.

Groundwater and Contaminated Land

Having reviewed the documents under the “EIA Screening Request” and “EIA Scoping Request”, in particular the July 2025 EIA Scoping Report and April 2025 Phase I Desk Study by ayesa, we have the following comments:

Although the applicant has scoped out “ground conditions and contaminated land” (4.3.32 of the Scoping Report), somewhat inconsistently, they do state in 4.3.30 that “ground investigations will be conducted to further assess potential coal mining risks and provide an indication of superficial and bedrock suitability for the Proposed Development, as well as shallow excavations to assess any potential ‘Made Ground’ contamination and superficial thickness.”; They go on to list the proposed investigations. These recommendations appear to come from the “6.3 Recommended Scope of Investigatory Works” of the April 2025 Phase I Report by ayesa (included as Appendix C of the July 2025 EIA Scoping Report).

The April 2025 Phase I Report does mention the historic landfill 10 m south of the site.

We generally agree with the recommendations for additional investigatory works and recommend that the landfill 10m south of the site be specifically identified as an area of interest for the proposed ground investigations.

It is anticipated that the proposed Construction Environmental Management Plan (CEMP) will address risks to soils, water courses and groundwater (amongst other environmental factors) during the construction phase(s).

Regarding pollution risks from fluid-filled transmission cables, the The Environment Agency’s approach to groundwater protection (also adopted by NRW) states the following:

C5 - Pipelines and high voltage fluid filled cables

The Environment Agency will normally object to pipelines or fluid filled cables that transport pollutants, particularly hazardous substances that:

- pass through SPZ1 or SPZ2 where this is avoidable
- are below the water table* in principal or secondary aquifers

Where there is an existing or unavoidable need for pipelines or fluid filled cables to pass through SPZ1 or SPZ2, operators are expected to adopt BAT and operate in accordance with the Energy Networks Association guidance.

Where existing pipelines or fluid filled cables are already below the water table or if the water level subsequently rises, the Environment Agency will work with operators to mitigate the risks. The Environment Agency will only agree to any redevelopment scheme with sub water table pipelines or fluid filled cables for the transport of hazardous substances where there are substantial mitigating factors. When the opportunity to replace existing fluid filled cables in SPZ1 and SPZ2 arises the Environment Agency will work with the operators to agree the best environmental option.

The Environment Agency expects operators to carry out a site-specific risk assessment prior to the decommissioning of pipelines or fluid filled cables in SPZ1 and SPZ2. It will then work with operators to agree the best available environmental option.

We recommend that the installation of any fluid-filled cables or any other cables or pipelines that have the potential to cause pollution be explicitly addressed in the proposed CEMP.

Related to controlled waters and contaminated land and potential pollution issues, except for the above comments, we generally agree with the proposed scope of the EIA and proposals for additional ground investigations. We will want to review any related work proposals and subsequent Phase II reports, along with the CEMP, when available.

Other Matters

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

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

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

Yn gywir / Yours faithfully

Louise Edwards

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

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

Planning and Environment Decisions Wales Sent by email	Eich cyfeirnod Your reference	CAS-03107-C5X9W1
	Ein cyfeirnod Our reference	
	Dyddiad Date	11 August 2025
	Llinell uniongyrchol Direct line	0300 0256007
	Ebost Email:	Cadwplanning@gov.wales

Dear Sir / Madam

White House Farm Solar & Battery - EIA Scoping Consultation

Thank you for your letter asking for Cadw's view on the above.

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

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

Advice

Within the developer ZTV:

Scheduled Monuments

PE529 Hook Quay

Registered Historic Lan

HLW (D) 3 Milford Haven Waterway

Listed Buildings:

11991 Clareston (grade II*)

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

Cadw were consulted on a screening opinion for this proposed development in November 2023. In our response we noted that intervening topography, buildings and vegetation will block or extensively screen all views between the designated historic assets and the proposed development. It was therefore our opinion that, the proposed development was unlikely to have a significant adverse impact on the settings of any designated historic assets. The impact on other environmental topics was determined to be greater than on the historic environment and therefore an environmental statement will need to be submitted with any application for this development.

The current scoping request is accompanied by a scoping report produced by Axis, which based on our response to the screening opinion, proposes to scope out the historic environment from the environmental statement. However, the historic environment will be considered in a series of standalone reports outside the environmental statement consisting of a Heritage Statement, an Archaeological Desk-Based Assessment, and a Archaeological Geophysical Survey Report. We concur that the historic environment can be scoped out of the environmental statement and agree that the standalone reports on the historic environment will produce adequate information for the impact of the proposed development on the historic environment to be considered when the application is determined.

Yours sincerely

Nichola Smith
Historic Environment Branch

From: Williams, Arwel (LGHCRA - Landscapes, Nature & Forestry) [REDACTED]

On Behalf Of LQAS

Sent: 15 August 2025 18:16

To: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>

Cc: LQAS <LQAS@gov.wales>

Subject: RE: EIA Scoping Consultation - DNS CAS-03107-C5X9W1 - White House Farm Solar & Battery

Good afternoon Georgia,

RE: EIA Scoping Consultation - DNS CAS-03107-C5X9W1 - White House Farm Solar & Battery.

My apologies for the delayed response in this case.

Please find attached the Department for Climate Change and Rural Affairs EIA Scoping consultation response on the above application.

In summary, there are a number of technical issues with the Agricultural Land Classification (ALC) report submitted. We are not willing to accept the findings as they stand and request the applicant and surveyor provide further justification to the points raised in Annex 1 of our letter.

I would be happy to discuss further if any clarification is required.

Regards

Arwel

Arwel Wyn Williams

Uwch Arbenigwr, Dosbarthiad Tir Amaethyddol a Phridd / Senior Specialist, Agricultural Land Classification & Soil

Is-adran Tirweddau, Natur a Choedwigaeth / Landscapes, Nature and Forestry Division

Adran dros Newid Hinsawdd a Materion Gwledig / Department for Climate Change & Rural Affairs

Llywodraeth Cymru / Welsh Government

Ffôn / Tel: [REDACTED]

E-bost: [REDACTED]

Ar y We / Internet: www.llyw.cymru/priddoedd / www.gov.wales/soils



Ref: DNS CAS-02366-F2C3K8

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

By Email: PEDW.Infrastructure@gov.wales

15th of August 2025.

Dear Georgia Peters,

Re: Scoping Direction Consultation Response – DNS CAS-03107-C5X9W1 - White House Farm Solar & Battery, Land at White House Farm, Freystrop, Pembrokeshire, SA62 4LE.

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

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

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

1. Agricultural Land Classification (ALC) – Information and Advice:

The Department can confirm that we do not hold any previous ALC field survey information for the proposed sites. The Predictive ALC Map¹ (2019) notes the site to be approximately 30ha ALC Subgrade 3a (BMV) and 12ha Subgrade 3b (non-BMV) agricultural land (See Annex 2). The area of BMV potentially impacted by the proposal is significant.

As per published Departmental Guidance², if BMV is identified on the Predictive Map, a detailed ALC field survey is required to confirm the grades and their distribution. An ALC

¹ <https://www.gov.wales/agricultural-land-classification-predictive-map>

² <https://www.gov.wales/agricultural-land-classification-predictive-map-guidance>

Survey has been undertaken by Oracle Environmental Experts on behalf of the applicant and is included in the scoping consultation documents (Ref: 2025-07-04 - EIA Scoping Request - Appendix B - Agricultural Land Classification Report).

Departmental surveyors have technically reviewed the report against the ‘*Agricultural Land Classification of England and Wales: Revised criteria for grading the quality of agricultural land*’ (MAFF 1988)³. The Department concludes the report, as it stands, does not provide sufficient information to support the grading of the site. **The ALC survey report (Ref: P252121/ALC) cannot therefore be accepted by the Department as an accurate assessment of land quality on the site.** Technical matters that require further clarification are detailed in Annex 1.

The Department recommends that the Applicant and Surveyor review and respond directly to LQAS@gov.wales on all the points raised in Annex 1 of this letter for reappraisal at the earliest opportunity.

Should any party refuse or neglect to commission an ALC survey, **or** the survey is not accepted by the Welsh Government, the Predictive ALC Map Grade (see Annex 2) should be accepted by the determining authority as the best available information.

2. Best and Most Versatile (BMV) agricultural land policy.

In the absence of an accepted ALC survey, the Predictive Map grades must be taken as best available information. Therefore, BMV agricultural land remains a matter for consideration in this development, and policy will apply. The Department will expect the applicant to provide clear evidence of how PPW paragraph 3.58 and 3.59 has been addressed in:

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

The Department would also highlight the policy clarification in the DCPO letter of 1st March 2022 regarding ‘*BMV agricultural land and solar PV arrays*’.

As it stands, it is highly probable that site will contain a significant area of BMV agricultural land. The ALC survey should be validated to confirm the grades, areas and distribution of grades in order to inform and be considered as part of the EIA assessment.

BMV agricultural land must remain scoped into the assessment.

3. Policy Context:

The Department considers the policies and guidance below are also applicable to this development: -

3

<https://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736>

- Technical Advice Note (TAN)6⁴
- Paragraph 3.58 and 3.59 of Planning Policy Wales (PPW)⁵.
- Policy 9 of the National Development Framework (NDF) – Future Wales⁶
- Policy 17 of NDF Future Wales - states '*all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment*'.
- Policy 18(11) of NDF Future Wales – sets out the requirement for '*...acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration*'.
- Dear CPO letter – '*BMV agricultural land and solar PV arrays*' – 1st March 2022⁷

4. Baseline information:

The location and extent of soils on site and their physical characteristics would be beneficial to assess potential impacts and inform decisions on infrastructure siting and decommissioning, restoration and beneficial after use of the site. The volumes of soil units that will be excavated for any on site infrastructure should be clear and based on survey evidence (this may be derived from an accepted ALC survey in part).

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

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

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

6. Soil Management Scheme (SMS).

Mineral, organo-mineral and peat soils are finite and provide crucial ecosystem services and functions to Wales such as food production, water regulation, carbon storage, and biological functioning. The proposal is likely to have significant impacts upon these important services and functions and therefore assessed.

⁴ <https://www.gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities>

⁵ <https://www.gov.wales/planning-policy-wales>

⁶ <https://www.gov.wales/future-wales-national-plan-2040-0>

⁷ <https://www.gov.wales/best-and-most-versatile-agricultural-land-and-solar-pv-arrays>

It is welcome that the applicant proposed to develop a Soil Management Plan (SMP). This should be informed by a validated and accepted baseline ALC report, including soil resources and physical characteristics, and be considered as part of the ES process.

The SMS should be a clear scheme and programme setting out how all soils and their function will be conserved and reinstated and that can be confidently conditioned against.

The SMS should be presented in sufficient detail for the determining authority and statutory consultees to form a judgement as to its feasibility. The Department welcomes the applicant's proposals to include the following in the SMP: -

- Soil stripping programme – including volumes and types of soils affected.
- Soil handling techniques and procedure.
- Size, location, construction, management, and period of soil storage dumps.
- Proposed decommissioning, after use and restoration programme, including techniques and aftercare programme.

The Department considers that soils, soil functions and land should be scoped into an assessment.

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

Yours sincerely

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

Annex 1.

Technical Assessment of ALC Report Ref: P252121/ALC, dated 11th of March 2025.

The ALC report covers approx. 52ha of agricultural land. The site is noted as being predicted to contain approx. 30ha of BMV agricultural land according to the Predictive ALC Map for Wales. In line with published guidance, planning applications must be supported by detailed ALC field survey evidence where BMV agricultural land is an issue for consideration.

Departmental surveyors have technically reviewed the report against the 'Agricultural Land Classification of England and Wales: Revised criteria for grading the quality of agricultural land' (MAFF 1988) (referred to below as the 'ALC Guidelines').

The Department concludes the report does not provide sufficient information to support the grading of the site. The ALC survey report (Ref: P252121/ALC) cannot, therefore, be accepted by the Department as an accurate assessment of land quality on the site. Technical issues requiring further information from the applicant and surveyor are detailed below:

- i. Section 2.2 of the report is inaccurate and should be amended. This section refers to the National Planning Policy Framework (NPPF) and planning policy implications as set out by Natural England. As this site is in Wales (not England) planning policy is covered by NDF Future Wales, Planning Policy Wales (PPW) 12 (2024), with the policy regarding BMV agricultural land detailed in PPW paragraphs 3.58 and 3.59. Consultation remit and arrangements with the Department are detailed in Technical Advice Note (TAN) 6, Annex B.
- ii. Section 2.6 – the 'Soil Survey Field Handbook' was updated in **2022**.
- iii. Section 2.4 – refers to a desktop study, however the use of the Predictive ALC Map and associated guidance note is not included nor is information on previous ALC surveys or published soil memoirs (e.g. Soils in Dyfed II by C.C. Rudeforth). References to the use of Defra MAGIC⁸ is not relevant as this site is in Wales.
- iv. Section 3.2 discusses slope limitations on site. However, no information is provided of how this was assessed in field to confirm findings on site. It is also not evidenced if micro-relief has been assessed. As this is considered by the surveyor as a main limitation on site, further justification of on-site observations is required.
- v. Section 3.3 notes information from NRW 'Flood and Coastal Erosion Risk Map' for the site. However, no confirmation is made of the assessment regarding flooding risk as per Table 2 and 3 of the ALC Guidelines.
- vi. Section 4 refers to published soil information for the site. However, no detail is provided of the Soil Associations / Series mapped on the site or reference to the Soil Memoirs or Regional Bulletins – this should be included. The national soil map indicates the site siting on NEATH (0541h)⁹ and BRICKFIELD 3 (0713g)¹⁰ soil associations.

⁸ <https://magic.defra.gov.uk/>

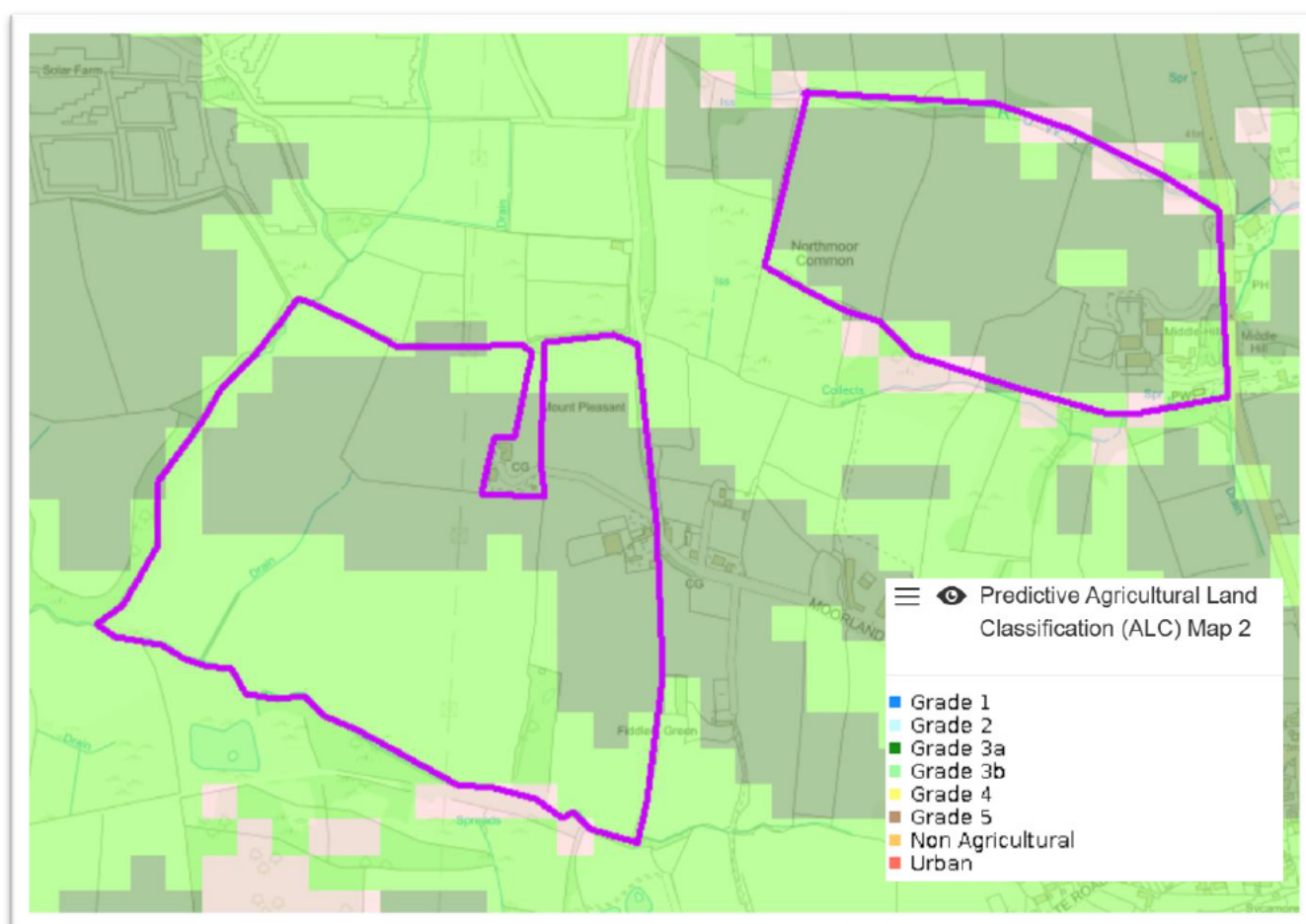
⁹ <https://www.landis.org.uk/soilsguide/mapunit.cfm?mu=54108>

¹⁰ <https://www.landis.org.uk/soilsguide/mapunit.cfm?mu=71307>

- vii. The survey methodology is unclear. The report notes that 48 auger bores and 4 soil pits were examined. Referring to the map in Figure 3, the survey appears to have been undertaken on a 'free-survey' basis. The recommended methodology for a full detail ALC survey is 1 observation per hectare on a fixed 100m grid, to avoid any survey bias. Soil pits must be representative of the soil types on site. Justification is requested as why a 'free-survey' was undertaken in this case.
- viii. Section 5.3.1.4 – this section is unclear regarding the stoniness assessment in Table 5 of the ALC Guidelines – please review. See further comments in XX regarding stoniness assessment.
- ix. Section 5.3.1.5 – see comments below (xiv, a.) regarding justification of Slowly Permeable Layer (SPL).
- x. Section 5.4 is illegible. Please review.
- xi. Table 3 – it is unclear why Figure 8 of the ALC guidelines was used to derive the wetness class (WC) TP01, TP03, SB06, SB11, SB16, SB17, SB18, SB19, SB22, SB24, SB 26, SB 29, SB 32, SB33, SB35, SB36, SB37, SB39, SB40, SB41, SB42, SB43, SB44, SB45, SB46 and SB 48. Further justification and explanation is required.
- xii. Table 3 – a number of auger borings have not wetness assessment assigned e.g. SB01, SB02, SB03, SB09, SB13, SB23, SB34. These are shallow profiles, however no clear justification is provided as they are stopped due to stone or are on bedrock. Please review and clarify.
- xiii. Figure 4 - Area of Grade 5 surrounding SB38 (C topsoil) – the Department would welcome further justification as to why this is graded as Grade 5 based on a single auger observation and not incorporated into the surrounding Grade 4 mapping unit?
- xiv. Figure 4 - Area of Grade 4 surrounding TP03 and area of Subgrade 3a surrounding SP34 and SP13 – the Department would welcome further justification as to why these are graded as they are based on a single auger observation and not incorporated into the surrounding mapping unit? Further justification is required to confirm if TP03 is a representative soil pit and how the soil observations at TP03 have been used to inform wider site grading.
- xv. Appendix C – auger boring log. There are a number of concerns here that require further information and clarification:
 - a. Slowly Permeable Layer (SPL) - The presence of a SPL has not been fully evidenced. Information is incomplete and unclear regarding soil structure. Of concern is that porosity has not been noted or evidenced, and it is unclear if this has been assessed. The ALC Guidelines (p.36) detail the definition and characteristics required to identify a SPL. The surveyor notes Wetness & Workability is the most limiting factor on site, therefore this needs to be reviewed, evidenced and justified in full.
 - b. The depth to a Gleyed horizon and/or SPL should be clearly noted in the auger boring log.

- c. The Munsell colour columns require further explanation over the status of 1st and colour 2nd – what are they identifying and does it have a relationship to the description column?
 - d. Mottling, where present, should be described as per the Soil Survey Field Handbook (2022).
 - e. The assessment of topsoil stone content has not been split to stones >2cm and Stones >6cm. The method for assessment undertaken has not been described in the report. Even if not grade critical in this case, this should be detailed and evidenced in the report.
 - f. A number of profiles examined do not extend to full depth (120cm). It is unclear why this is - due to bedrock (impermeable) or stone content (which roots can penetrate)? The examination of a soil pit(s) should confirm this, but do not.
- xvi. Soil pits shown in the photographs appear small. A representative soil pit (100x100x120cm depth) is expected to provide definitive profile descriptions of each soil type or mapping unit. For photographs, it is usually best practice to include a gauge of depth with a tape measure or interval-marked auger.
- xvii. Appendix E: Laboratory Results. It is welcome that PSD analysis has been undertaken, using the pipette method, and results provided in the report. The Department would welcome clarification that the analysis has been undertaken of topsoil (top 25cm) only. The laboratory analysis results note depths of 0.1-0.3 for all sample results.

Annex 2. - Predictive ALC Map (2019) for the proposed site.



From: [Cuddy, Paul \(EET - Network Management Division\)](#)
To: [PEDW – Seilwaith / Infrastructure](#)
Cc: [LGC Development Control \(South\)](#)
Subject: DNS CAS-03107-C5X9W1 - Land at White House Farm, Freystrop
Date: 08 August 2025 12:06:51

Dear Sir or Madam,

Further to PEDW's consultation dated 8th July in respect of the above DNS Scoping Opinion, having reviewed the supplied information, the Welsh Government do not wish to comment further in respect of the supplied Environmental Impact Assessment (EIA) Scoping Opinion.

However, it should be noted that during the formal DNS planning application stage, we would request the submission of the following:

1. A detailed Construction Traffic Management Plan (CTMP) that should detail the proposed routing of all construction and delivery traffic, identifying any issues impacting the Strategic Road Network (SRN)
2. A Transport Assessment, which should identify any impact the generated traffic may have upon the SRN whilst detailing any necessary mitigation.
3. A Glint and Glare Assessment

Regards

Paul Cuddy

Peiriannydd Ffyrdd / Route Engineer

[Is-adran Rheoli'r Rhwydwaith](#) - Network Management Division
[Trafnidiaeth](#) / Transport
[Llywodraeth Cymru](#) / Welsh Government
[Parc Cathays](#) / Llandudno Junction
[Llandudno](#) / Llandudno

Dear Mr Sparey

Thank you for your email dated 8 July 2025 consulting HSE on the Proposed White House Farm Solar & Battery - Development of National Significance (DNS). Please find HSE's advice below.

HSE's land use planning advice

1. With reference to **Figure 1 Site Location Plan** found in [\[https://planningcasework.service.gov.wales/case/CAS-03107-C5X9W1, Reference: DNS CAS-03107-C5X9W1 - White House Farm Solar & Battery\]](https://planningcasework.service.gov.wales/case/CAS-03107-C5X9W1) on which is shown a red-lined *Site Location*, there are areas of the proposed development that fall within HSE public safety consultation zones associated with Major Accident Hazard Pipeline(s):
 - a. Haverfordwest / Thornton (HW025) [HSE ref: 7333, Transco ref: 1598] - Wales and West Utilities
 - b. Haverfordwest / Thornton (HW050) [HSE ref: 7360, Transco ref: 1619] - Wales and West Utilities
 - c. 28 Feeder Herbrandston to Aberdulais pipeline [HSE ref: 14315, Transco ref: 2768] – National Gas
2. The red-lined *Site Location* does not currently fall within the consultation distances of any Major Accident Hazard Installation(s).
3. HSE will not advise against the proposed development, providing the proposed development does not introduce populations, either permanent or temporary, into any of HSE's public safety consultation zones which are assigned to individual Major Accident Hazard Pipeline(s).
4. Please note if at any time a new Major Accident Hazard Pipeline is introduced or existing Pipeline modified prior to the determination of a future application, the HSE reserves the right to revise its advice.
5. Likewise, if prior to the determination of a future application, a Hazardous Substances Consent is granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed project, again the HSE reserves the right to revise its advice.

Would Hazardous Substances Consent be needed?

6. The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for

which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) (Wales) Regulations 2015.

7. Hazardous Substances Consent would be required if the proposed development site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.
8. Further information on HSC should be sought from the relevant Hazardous Substances Authority.

-

Explosives sites

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

Regards

NSIP Consultation Team
Health and Safety Executive

Shirley Rance | Business Support Team
Health and Safety Executive | CEMHD - DBST
NSIP.Applications@hse.gov.uk





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

Prif Swyddog Tân | Chief Fire Officer

R.S. Thomas *KFSM BA(Hons) MSc*

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0370 60 60 699

PEDW
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CF10 3NQ

Gofynner am/
Please ask for:
Rhif Est/Extn.
No.

Watch Manager Kris Steele

E-bost/E-mail:

bregs@mawwfire.gov.uk

Fy Nghyf/My
Ref:

KS/KDT/00358496

Dyddiad/Date:

09 July 2025

Dear Sir / Madam,

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

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

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

**RE: The proposed development comprises a 39 MW Peak (MWp) solar farm and 12 MW
battery energy storage system (BESS) on Land at White House Farm, Freystrop,
Pembrokeshire SA62 4LE**

REFERENCE NUMBER: DNS CAS-03107-C5X9W1

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

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

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

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

<https://www.water.org.uk/guidance/national-guidance-document-on-the-provision-of-water-for-firefighting-3rd-edition-jan-2007/>

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

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

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

We welcome calls in Welsh and English.

100% wedi'i ailgylchu | recycled

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

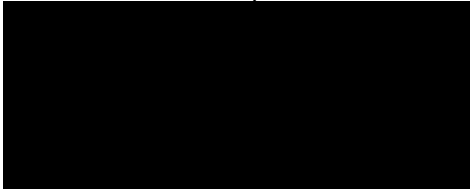
OUR VISION
To deliver the best possible service for
the communities of mid and west Wales.

#eichgtacgc #yourmawwfrs

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

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

Yours faithfully



Watch Manager K Steele
Authorised Fire Safety Inspector
On behalf of the Mid and West Wales Fire and Rescue Authority

Encs.

MID AND WEST WALES FIRE AND RESCUE SERVICE

Advice on Water Supplies

1. WATER SUPPLIES FOR FIREFIGHTING

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

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

Access to Open Water Supplies

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

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

1.1. HOUSING

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

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

1.2. TRANSPORTATION

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

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

1.3. INDUSTRY

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

Light Industrial/Commercial

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

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

High Risk Industrial

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

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

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

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

1.4. SHOPPING, OFFICES, RECREATION AND TOURISM

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

1.5. EDUCATION, HEALTH AND COMMUNITY FACILITIES

Village Halls

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

Primary Schools and Single Storey Health Centres

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

Secondary Schools, Colleges, Large Health and Community Facilities

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

1.6. DISTANCES BETWEEN FIRE HYDRANTS

The distance between fire hydrants should not exceed the following:

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

1.7. CONCLUSION

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

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



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T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

For the attention of: Mr R Sparey – Planning & Environment Manager
PEDW

[By email: PEDW.infrastructure@gov.wales]

6th August 2025

Dear Mr Sparey

Re: DNS CAS-03107-C5X9W1 - EIA Scoping Opinion - The proposed development comprises a 39 MW Peak (MWp) solar farm and 12 MW battery energy storage system (BESS).; Land At White House Farm, Freystrop, Pembrokeshire, SA62 4LE

Thank you for your notification of the 8th July 2025 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the area identified for the project there are coal mining features at surface and shallow depth including; multiple mine entries, coal outcrops and reported surface hazards. These features pose a potential risk to surface stability and public safety.

The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with our adopted policy:

<https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>

The submission is supported by a Phase 1 Desk Study, dated April 2025 and prepared by Ayesa. This report acknowledges the coal mining features recorded to be present and the potential risks they pose to the development. Based on this the report authors recommend that intrusive site investigations are carried out on site in order to establish if shallow coal workings are present and to locate the recorded mine entries.

Where mine entries are present if these have not been investigated, located and treated we would recommend that these identified areas (the mine entry best plot position, its departure and zone of influence) are fenced and kept devoid of development. It would be helpful if the relationship of the mine entries and their zones of influence and the layout of the project was annotated on a layout plan for future submissions.

We note that the submission concludes that ground conditions will be scoped out of the EIA but that stand alone reports will be submitted, The Planning team at the Coal Authority have no specific preference on whether ground conditions are included in the EIA and would raise no objections subject to coal mining risks being covered in a CMRA, Phase 1 and/or Phase 2 report accompanying any formal submission.

If you would like to discuss this matter further, please contact me on the above number.

Yours sincerely



Melanie Lindsley *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
Principal Planning & Development Manager

Disclaimer

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority by the Local Planning Authority and/or information that has been published on the Council's website for consultation purposed in relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the applicant for consultation purposes.



In formulating this response the Coal Authority has taken full account of the professional conclusions reached by the competent person who has prepared the Coal Mining Risk Assessment or other similar report. In the event that any future claim for liability arises in relation to this development the Coal Authority will take full account of the views, conclusions and mitigation previously expressed by the professional advisors for this development in relation to ground conditions and the acceptability of development.

